APEX2100

International Ski Academy · Académie Internationale de Ski

SAFEGUARDING

POLICY 2026

Safeguarding Children and Child Protection Policies And Procedures

Key external contact details

Support and Advice about Extremism	**Department for Education** NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk
NSPCC whistleblowing advice line	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	PO Box 3963 Royal Wootton Bassett SN4 4HH Tel: +44 (0) 3000 200 190 Email: dbsdispatch@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk

Key School Contact Details

Apex2100	**Chair of Apex2100 Education Board and Designated Safeguarding Governor** Mike Buchanan Email: mike@positivelyleading.co.uk Mobile: +44(0)7941 093 102
Designated Safeguarding Lead (DSL)	**DSL** Dave Breen TEL: +33669190282 EMAIL: dave.breen@apex2100.org
Deputy Designated safeguarding lead (DDSL)	**DDSL** Mark Tilston TEL: +33668153089 EMAIL: mark.tilston@apex2100.org
Deputy Designated safeguarding lead (DDSL)	**DDSL** Stuart Terris EMAIL: stuart.terris@apex2100.org
Deputy Designated safeguarding lead (DDSL)	**DDSL** **Karen Thomas** EMAIL: karen.thomas@apex2100.org
Cheif Executive Officer (CEO)	Chris Thomson TEL: +44 7733 331193 EMAIL: Chris@apex2100.org

Apex2100

Academic Year: 2026–2027
Policy Owner: Apex2100 Education Board
Designated Safeguarding Lead (DSL): Dave Breen
Deputy Designated Safeguarding Leads (DDSLs): Karen Thomas, Stuart Terris and Mark Tilston
Designated Safeguarding Governor / Board Lead: Mike Buchanan
Review frequency: At least annually and sooner where legislation, statutory guidance or local safeguarding arrangements change
Presented to Board – September 2026

Next scheduled review: September 2027

---

1. Policy Statement

This policy applies to Apex2100 Academy.

Apex2100 is committed to safeguarding and promoting the welfare of every child and young person in its care. Safeguarding is a shared responsibility and every member of staff, governor, volunteer, contractor and other person working with or on behalf of the School has a responsibility to identify concerns, respond appropriately and share information where necessary to protect children.

The School recognises that safeguarding concerns may arise in a variety of contexts, including within the School, in boarding and residential settings, at host schools, during travel and activities, within families and communities, and online.

For each academic year, Apex2100 relies on its safeguarding relationships with the relevant host schools, their safeguarding leads and the relevant local safeguarding partners and local authorities. Because students may be placed with or educated through different host schools and local authorities, Apex2100 does not identify a single local authority as its safeguarding authority.

Where a safeguarding concern arises, Apex2100 will work with the relevant host school, local authority children's social care, police and other safeguarding partners in accordance with the procedures applying to the student's location.

This policy is reviewed at least annually by the Educational Board and whenever there is a significant change in legislation, statutory guidance, local safeguarding arrangements or School practice.

This policy has regard to current statutory guidance and legislation, including:

- Keeping Children Safe in Education 2026 (KCSIE), in force from 1 September 2026.
- Working Together to Safeguard Children 2026.
- The Education (Independent School Standards) Regulations 2014, as amended.
- The Children Act 1989 and Children Act 2004.
- The Education Act 2002.
- The Safeguarding Vulnerable Groups Act 2006.
- The Childcare Act 2006 and relevant statutory guidance concerning disqualification from childcare.
- The Counter-Terrorism and Security Act 2015 and current Prevent Duty Guidance.
- The Equality Act 2010.
- The Data Protection Act 2018 and UK GDPR, as applicable.
- Relevant statutory guidance concerning female genital mutilation.
- Current national standards and safeguarding requirements applicable to boarding schools and residential provision.
- Current Department for Education and safeguarding-partner guidance relating to child-on-child abuse, sexual violence and sexual harassment, online safety, attendance, children missing education, exploitation and other safeguarding risks.

The School will also have regard to the safeguarding arrangements, threshold documents, referral procedures and escalation arrangements operated by the relevant host school and local safeguarding partners.

---

2. Concerns About a Child

The School has a duty to consider the best interests of every student and to take action to enable children to achieve the best possible outcomes.

Safeguarding and promoting the welfare of children is everyone's responsibility.

Every member of staff must:

- remain alert to signs that a child may be at risk of harm;
- know how to respond to a disclosure or safeguarding concern;
- report concerns without delay;
- share information appropriately;
- record concerns accurately and contemporaneously;
- challenge unsafe practice or inaction; and
- cooperate with safeguarding partners and statutory agencies.

Apex2100

The School recognises that children may communicate concerns directly, indirectly or through changes in behaviour, attendance, relationships, wellbeing or presentation.

The School will provide appropriate opportunities for students to raise concerns about themselves or others and will promote a culture in which children are listened to and taken seriously.

The School will support children to understand how and where they can obtain help.

---

3. Definition of Safeguarding

Safeguarding and promoting the welfare of children means:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Safeguarding encompasses child protection but is broader than child protection.

The School recognises that safeguarding concerns may include, but are not limited to:

- physical abuse;
- emotional or psychological abuse;
- sexual abuse;
- neglect;
- domestic abuse;
- child-on-child abuse;
- harmful sexual behaviour;
- sexual harassment and sexual violence;
- online abuse;
- grooming and exploitation;
- child criminal exploitation;
- child sexual exploitation;
- serious violence;
- county lines activity;
- modern slavery and trafficking;
- radicalisation and extremism;
- female genital mutilation;
- forced marriage;
- honour-based abuse;
- upskirting;

- abuse within intimate or peer relationships;
- bullying and cyberbullying;
- children missing from education;
- abuse or neglect within residential or boarding settings;
- substance misuse;
- self-harm and other safeguarding-related wellbeing concerns;
- risks associated with homelessness or family circumstances; and
- risks arising from the misuse of technology or social media.

Abuse can occur online, offline or through a combination of both.

A child may be harmed by an adult, another child, a group of children or other persons.

---

4. Recognising Abuse and Neglect

Staff should maintain professional curiosity and should not assume that an apparently isolated incident is insignificant.

Signs of abuse may include:

- unexplained injuries;
- repeated injuries;
- changes in behaviour;
- withdrawal or anxiety;
- unusual sexualised behaviour;
- fear of particular people or places;
- deterioration in educational performance;
- changes in friendships;
- unexplained possessions or money;
- increased secrecy;
- changes in eating or sleeping patterns;
- self-harm;
- substance misuse;
- persistent absence;
- going missing;
- inappropriate sexual knowledge or behaviour;
- signs of grooming or exploitation;
- significant changes in online behaviour;
- fear of returning home or going to a particular location; or
- any other change which causes a member of staff to have concerns about a child's welfare.

Staff must remember that the presence or absence of these indicators does not, in itself, prove abuse.

The School will consider the child's circumstances and the wider context.

---

5. What Staff Should Do if They Have a Concern

If any member of staff, governor, volunteer or other person working with children has a concern about a student's welfare, they must act promptly.

The concern should be reported to:

1. **Dave Breen, DSL**, or
2. **Karen Thomas, Stuart Terris or Mark Tilston, DDSLs**, where the DSL is unavailable.

If none of the safeguarding leads is immediately available, staff must not delay action.

They should contact an appropriate member of senior leadership and/or the relevant children's social care service or safeguarding partner.

If a child is in immediate danger or is likely to suffer serious harm, staff should contact the **emergency services** and/or children's social care as appropriate.

Any action taken must be reported to the DSL or a DDSL as soon as possible. Staff must never assume that another person has reported a concern.

---

6. Responding to a Disclosure

When a child discloses a safeguarding concern, staff should:

- listen carefully;
- remain calm;
- take the child seriously;
- allow the child to speak at their own pace;
- use open and non-leading questions where clarification is necessary;
- avoid investigating the allegation themselves;
- avoid making promises they cannot keep;
- explain that information may need to be shared to keep the child safe;
- explain what will happen next where appropriate;
- reassure the child that they have done the right thing by speaking up; and
- report the concern immediately to the DSL or a DDSL.

Staff should not:

- promise absolute confidentiality;

- ask leading or investigative questions;
- express disbelief;
- confront an alleged perpetrator;
- investigate allegations themselves;
- make assumptions about the truth of an allegation; or
- delay reporting.

---

7. Recording Safeguarding Concerns

All safeguarding concerns, disclosures, discussions, decisions and actions must be recorded promptly.

Apex2100 will use its designated safeguarding/wellbeing recording system for safeguarding records.

Records should include, where known:

- the date and time;
- the student's name;
- the name and role of the person making the report;
- the date, time and location of the incident or disclosure;
- the factual information reported or observed;
- the words used by the child where reasonably possible;
- any action already taken;
- who the concern was reported to;
- decisions made;
- the reasons for those decisions;
- referrals or information-sharing undertaken;
- follow-up action; and
- the name/signature or electronic identification of the person making the record.

Records must be factual, objective and distinguish clearly between fact, observation, allegation and professional opinion.

Where concerns include online elements, staff must not view, download, copy, forward or otherwise distribute illegal images of children.

Staff should record what has been reported and immediately refer the matter to the DSL.

Safeguarding records will be stored securely on ISAMS and separately from the main student record where appropriate.

---

8. Information Sharing and Confidentiality

The School recognises that safeguarding information is often sensitive and may constitute special category personal data.

Information will be handled in accordance with applicable data protection law and the School's data protection procedures.

The School will seek consent to share information where appropriate, but consent is not always required to share safeguarding information.

Information may be shared without consent where there is a lawful basis to do so, including where sharing is necessary to protect a child or another person from harm.

Staff must not allow concerns about information sharing to prevent appropriate safeguarding action.

The School will share information:

- lawfully;
- fairly;
- proportionately;
- securely;
- on a need-to-know basis; and
- where necessary to safeguard a child.

The decision to share or withhold information should be recorded together with the rationale and, where appropriate, the recipient of the information.

---

9. What Staff Should Do Where a Child Is Suffering or Is Likely to Suffer Harm

If a member of staff believes that a child:

- is suffering harm;
- is likely to suffer harm;
- is in immediate danger; or
- requires immediate protection,

an immediate referral should be made to the relevant children's social care service and/or the **emergency services**, as appropriate.

Anyone can make a safeguarding referral.

Apex2100

If a member of staff makes a referral directly, they must inform the DSL or a DDSL as soon as possible.

The DSL will ensure that the referral is recorded and that appropriate follow-up action takes place.

The School will follow the referral procedures of the relevant host school and local safeguarding partners.

---

10. Early Help

The School recognises that early help can prevent concerns from escalating and can improve outcomes for children.

All staff should be particularly alert to children who may benefit from early help, including children who:

- have additional needs or disabilities;
- have special educational needs;
- are young carers;
- are experiencing family difficulties;
- are affected by domestic abuse;
- have parents or carers experiencing substance misuse or mental health difficulties;
- are showing early signs of abuse or neglect;
- are frequently absent or missing;
- are at risk of exploitation;
- are involved in or at risk of criminal or antisocial behaviour;
- are at risk of radicalisation;
- are affected by serious violence;
- are privately fostered;
- have returned home from care;
- are experiencing homelessness or housing instability; or
- have other circumstances which may place them at increased safeguarding risk.

Staff who believe that a child may benefit from early help should discuss the concern with the DSL or a DDSL.

The DSL will determine whether early help is appropriate and will liaise with the relevant agencies and host school.

Early help cases will be reviewed regularly.

Where circumstances deteriorate or do not improve, the DSL will consider whether a referral to children's social care is required.

11. Escalation and Professional Challenge

Staff must not assume that another professional or agency will take action.

Where a concern has been referred and the child's circumstances do not improve, the DSL or person who made the referral should consider whether further action or escalation is necessary.

Staff should challenge decisions or inaction where they believe this is necessary to protect a child.

The School will follow the escalation procedures of the relevant host school and local safeguarding partnership.

12. Preventing Radicalisation and Extremism

The School recognises its responsibilities under the Prevent duty.

Staff must be alert to the possibility that a child may be vulnerable to radicalisation or extremist influence.

Indicators may include:

- increasing isolation;
- significant changes in behaviour;
- expression of extremist views;
- increased engagement with extremist material online;
- attempts to recruit or influence others;
- intolerance towards particular groups;
- exposure to extremist networks;
- unexplained changes in friendships or associations; or
- other behaviour which causes concern.

Staff should report concerns to the DSL or a DDSL.

The School will assess concerns on a case-by-case basis and may seek advice from the host school, children's social care, safeguarding partners or other appropriate agencies.

A referral to the appropriate Prevent/Channel arrangements may be considered where appropriate.

Where there is an immediate or significant risk, staff should contact the **emergency services** and/or relevant safeguarding authorities.

The School will promote resilience, critical thinking and respectful engagement with different beliefs and viewpoints.

13. Female Genital Mutilation (FGM)

FGM is illegal and is a form of child abuse.

All staff must report concerns about a child who may be at risk of FGM to the DSL or a DDSL.

Teachers and other professionals with a statutory reporting duty must comply with the applicable legal requirements where they discover that an act of FGM appears to have been carried out on a girl under the age of 18.

The School will follow current statutory guidance and the relevant local safeguarding referral procedures.

Where there is an immediate danger, staff should contact the **emergency services**.

14. Forced Marriage and Honour-Based Abuse

The School recognises that children may be at risk of forced marriage, honour-based abuse or other forms of family or community-based abuse.

Indicators may include:

- fear about forthcoming travel;
- sudden absence;
- withdrawal from education;
- pressure to marry;
- restrictions on movement;
- threats from family members;
- unexplained injuries;
- significant changes in behaviour;
- concerns about family expectations; or
- disclosures about marriage or relationships being arranged against the child's wishes.

Staff should report concerns immediately to the DSL or a DDSL.

Staff must not attempt to mediate with family members or disclose concerns to them without first obtaining safeguarding advice.

15. Upskirting

Upskirting includes taking an image under a person's clothing without consent, usually for sexual gratification or to cause humiliation, distress or alarm.

It is unacceptable and may constitute a criminal offence.

Any incident involving a student must be reported immediately to the DSL or a DDSL.

The School will consider the safeguarding needs of all students involved and will determine whether children's social care, the police or other agencies should be contacted.

Incidents involving adults working at or associated with the School must be reported through the appropriate staff allegation procedure.

---

16. Child Criminal Exploitation and Serious Violence

The School recognises the risks of child criminal exploitation, including county lines activity, trafficking, coercion and exploitation by criminal networks.

Possible indicators include:

- unexplained gifts or possessions;
- unexplained money;
- increased absence;
- going missing;
- relationships with older individuals or groups;
- changes in friendships;
- decline in educational performance;
- signs of assault or unexplained injuries;
- carrying weapons;
- substance misuse;
- changes in behaviour or wellbeing;
- self-harm;
- association with criminal groups; or
- online content glorifying serious violence or criminal activity.

Any concern must be reported to the DSL or a DDSL without delay.

The School will consider the wider context of the child's circumstances and will work with host schools, children's social care, police and other safeguarding partners where necessary.

---

17. Drugs and Alcohol

The School recognises that drug and alcohol misuse can be a safeguarding concern.

The School will promote healthy choices and resilience through its pastoral and educational programmes.

Where staff have concerns about a student's drug or alcohol use, including concerns arising outside School, they should report the matter to the DSL or a DDSL where there is a safeguarding dimension.

The School may work with parents, host schools, healthcare professionals, children's social care or other agencies where appropriate.

Any response will consider the student's welfare and the wider safeguarding context.

---

18. Children Missing from Education

Children missing from education may be at increased risk of abuse, neglect, exploitation, radicalisation or other safeguarding concerns.

The School will monitor attendance and absence and will respond to unexplained or repeated absence.

Where a student fails to attend as expected, staff must follow the School's attendance and missing-student procedures.

The School will liaise with the relevant host school and local authority.

Where required by local procedures, the School will report persistent or prolonged unexplained absence to the relevant authority.

Apex2100 will ensure that safeguarding concerns are not overlooked simply because a student is absent.

---

19. Child-on-Child Abuse

The School recognises that children can abuse other children.

Child-on-child abuse may include:

- physical abuse;
- emotional abuse;
- bullying;
- cyberbullying;
- sexual harassment;
- sexual violence;
- harmful sexual behaviour;
- sexual assault;
- sharing sexual images;
- coercive or controlling behaviour;
- intimate partner abuse;
- financial abuse;
- exploitation;
- initiation or hazing-type behaviours; and
- abuse facilitated through technology or social media.

Child-on-child abuse is never acceptable and must not be dismissed as:

- banter;
- part of growing up;
- boys being boys;
- a joke;
- just having a laugh; or
- normal relationship behaviour.

The School will consider the context in which an incident occurred and whether there are wider safeguarding concerns.

---

20. Responding to Child-on-Child Abuse

Where a member of staff suspects that a child may have experienced abuse from another child, or may be abusing another child, the concern must be reported to the DSL or a DDSL without delay.

All children involved will be treated as potentially requiring safeguarding support.

The School will consider the needs of:

- the child who has experienced the alleged abuse;
- the child alleged to have caused the harm;
- witnesses and other affected children; and
- the wider student community where appropriate.

The School will consider:

- the nature of the allegation;

- the ages and developmental stages of the children;
- any power imbalance;
- whether the behaviour is isolated or part of a pattern;
- the context;
- any previous concerns;
- online elements;
- ongoing risks; and
- the wishes and feelings of the children involved.

The School will take appropriate steps to protect all children and will work with the relevant host school and safeguarding agencies.

---

21. Sexual Violence and Sexual Harassment

The School has a zero-tolerance approach to sexual violence and sexual harassment.

Students must never be made to feel that they have caused a problem by reporting sexual misconduct.

Where an allegation concerns sexual violence or sexual harassment, the DSL or DDSL will consider immediate safeguarding arrangements.

Where possible, two members of staff should be involved in responding to an allegation, one of whom should be the DSL or DDSL where practicable.

The DSL will consider:

- the wishes of the victim;
- the nature of the alleged incident;
- the ages of the children involved;
- developmental stages;
- any power imbalance;
- whether the incident is isolated or part of a pattern;
- ongoing risks;
- the wider context;
- online elements; and
- the needs of all children affected.

A risk and needs assessment will be undertaken following reports of sexual violence and will be considered following reports of sexual harassment.

The assessment will consider the victim, the alleged perpetrator and other children or staff who may be affected.

Appropriate measures may include changes to classes, accommodation, activities, transport or contact arrangements.

Where an allegation may constitute a criminal offence, the School will consider referral to the police and children's social care.

Rape, assault by penetration and sexual assault will be referred to the appropriate authorities in accordance with statutory safeguarding procedures.

---

22. Sexting and Sharing Sexual Images

The School recognises the safeguarding risks associated with children creating, receiving or sharing sexual images.

Where a concern is raised, staff must:

- remain calm;
- not view, copy, download or forward illegal images;
- not ask the student to send or show the image;
- report the concern immediately to the DSL or a DDSL;
- preserve relevant factual information about what has been reported; and
- follow the School's safeguarding and online safety procedures.

The School will determine the appropriate safeguarding response based on the circumstances.

Police and children's social care may be contacted where appropriate.

Disciplinary action will not be automatic and will be considered alongside the safeguarding needs and circumstances of all children involved.

---

23. Safeguarding Children with SEND

The School recognises that children with special educational needs and disabilities may face additional safeguarding risks.

These may include:

- communication difficulties;
- increased dependence on adults;
- social isolation;
- difficulty recognising inappropriate behaviour;
- increased vulnerability to peer abuse;
- online exploitation;

- difficulty reporting concerns; and
- increased vulnerability within residential environments.

Staff must remain alert to the possibility that changes in behaviour may indicate abuse even where a child has an existing behavioural, medical or developmental condition.

The School will make reasonable adjustments to ensure that children with SEND can report concerns and access safeguarding support.

---

24. Safeguarding in Boarding and Residential Settings

Apex2100 recognises that residential and boarding environments present additional safeguarding considerations.

The School will:

- maintain appropriate supervision;
- assess safeguarding risks associated with accommodation;
- consider risks arising from children sharing accommodation;
- maintain clear expectations concerning relationships and behaviour;
- respond promptly to concerns about child-on-child abuse;
- ensure staff understand professional boundaries;
- ensure safeguarding arrangements apply outside normal teaching hours;
- monitor online safety;
- consider risks associated with visitors and external persons;
- maintain appropriate emergency arrangements; and
- work closely with host schools and relevant safeguarding partners.

The School will have regard to the current National Minimum Standards for Boarding Schools where applicable.

---

25. Allegations Against Staff, Governors, Volunteers and Contractors

The School's procedures apply where an allegation or concern is made that a person working with children has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child in a way that indicates they may pose a risk of harm to children.

This includes allegations concerning:

- teachers;
- support staff;
- volunteers;
- governors;
- contractors;
- agency workers;
- supply staff;
- coaches;
- visiting professionals; and
- other adults working with or around students.

Any such concern must be reported immediately to the DSL.

Where the allegation concerns the DSL, it must **not** be reported to the DSL. It should instead be reported to the appropriate senior safeguarding/governance authority, including the Chair of the Education Board and/or other designated safeguarding authority in accordance with the School's arrangements.

The School will not undertake an internal investigation before obtaining appropriate advice from the Local Authority Designated Officer (LADO), police or children's social care where required.

The School will follow current statutory procedures for allegations against adults working with children.

---

26. Historical Allegations

Historical or non-recent allegations of abuse must be taken seriously.

Where an allegation relates to abuse that may have occurred in the past, the School will seek appropriate advice and make referrals to the police and/or children's social care where required.

The fact that an allegation is historical does not reduce its safeguarding significance.

---

27. Managing Allegations Against Staff

Where an allegation meets the statutory criteria, the case manager will:

1. Ensure the allegation is reported immediately to the appropriate safeguarding authority.

2. Consult the LADO without delay and, where necessary, the police or children's social care.
3. Record all discussions and decisions.
4. Ensure appropriate safeguarding measures are put in place.
5. Consider whether suspension or alternative working arrangements are necessary.
6. Ensure the employee is treated fairly and is provided with appropriate support.
7. Keep parents informed where appropriate and where doing so does not prejudice an investigation.
8. Liaise with relevant agencies throughout the process.
9. Consider DBS and/or Teaching Regulation Agency referrals where legally required.
10. Review the School's safeguarding practice following the conclusion of the matter.

Suspension will not be automatic and will only be considered where appropriate following a risk assessment and advice from relevant safeguarding authorities.

Where a residential or boarding staff member is suspended, the School will consider whether alternative accommodation away from children is necessary.

---

28. Low-Level Concerns About Staff

The School recognises the importance of identifying and addressing low-level concerns about adults working with children.

A low-level concern is any concern, however small, or even if no more than a sense of unease, that an adult working with children may have acted in a way that:

- is inconsistent with the School's Staff Code of Conduct; or
- does not meet expected professional standards, even if it does not meet the threshold for an allegation requiring referral to the LADO.

Examples may include:

- inappropriate language;
- unnecessary physical contact;
- over-familiarity;
- inappropriate communication;
- breaches of professional boundaries;
- inappropriate use of social media;
- favouritism; or
- other behaviour which causes concern.

Staff should report low-level concerns to the DSL.

Apex2100

The School will maintain appropriate records and will monitor patterns over time.

A low-level concern must not be dismissed simply because it appears minor.

Where information suggests that the threshold for a formal allegation has been met, the matter must be dealt with under the appropriate allegations procedure.

---

29. Staff Behaviour and Code of Conduct

The School maintains a Staff Code of Conduct designed to establish clear expectations for professional behaviour and boundaries.

Staff must:

- maintain appropriate professional boundaries;
- communicate appropriately with students;
- avoid inappropriate physical contact;
- use School-approved communication systems;
- maintain appropriate online and social media boundaries;
- avoid private relationships with students;
- report concerns about colleagues;
- follow safeguarding procedures; and
- challenge unsafe or inappropriate practice.

Staff must never use their position to exploit, manipulate or develop inappropriate relationships with students.

---

30. Whistleblowing and Poor Safeguarding Practice

Staff have a professional responsibility to challenge poor safeguarding practice.

Where a member of staff has concerns about:

- unsafe practices;
- failures to follow safeguarding procedures;
- inadequate responses to concerns;
- inappropriate staff behaviour;
- poor record keeping; or
- other safeguarding failures,

they should raise the concern through the School's whistleblowing procedure.

No staff member will be subject to disciplinary action for raising a genuine safeguarding concern in good faith.

Where a member of staff feels unable to raise a concern internally, or believes that their concern has not been appropriately addressed, they may use an appropriate external whistleblowing route, including the NSPCC whistleblowing advice line.

---

31. Safer Recruitment

Apex2100 is committed to safer recruitment and safer working practices.

Appropriate pre-employment checks will be undertaken before individuals commence work with children.

Depending on the role, checks may include:

- verification of identity;
- right to work;
- references;
- employment history;
- appropriate DBS checks;
- Children's Barred List checks where legally permitted and required;
- prohibition checks;
- checks relating to management restrictions where applicable;
- overseas criminal record or other checks where appropriate;
- qualifications;
- professional registration;
- medical fitness where required; and
- other checks required by current legislation and statutory guidance.

The School will determine the appropriate level of check based on the duties and responsibilities of the role.

Individuals must not undertake regulated activity requiring a barred-list check until the appropriate checks have been completed, except where the law permits alternative arrangements.

Where individuals are permitted to work before all checks are complete, the School will undertake a written risk assessment and ensure appropriate supervision and safeguards are in place.

The School will also undertake appropriate checks on agency staff, contractors, visiting professionals and volunteers.

---

32. Childcare Disqualification

Where applicable to the School's provision, Apex2100 will comply with the Childcare Act 2006 and current statutory guidance concerning disqualification from childcare.

The School will ensure that it does not knowingly employ a person who is disqualified from relevant childcare provision where the legislation applies.

The School will maintain appropriate records and seek professional advice where the application of the legislation is unclear.

---

33. Visiting Speakers and Visitors

The School will maintain procedures for ensuring that visitors and visiting speakers are suitable and appropriately supervised.

Before a visiting speaker attends, the School may undertake:

- identity checks;
- appropriate safeguarding checks;
- risk assessment;
- review of the proposed content;
- consideration of the speaker's background and suitability; and
- DBS or other checks where legally appropriate.

Visiting speakers must not undermine the School's safeguarding responsibilities or promote illegal, discriminatory or extremist activity.

Visitors will be appropriately supervised while on School premises.

Visitors may be required to provide current photographic identification.

The School will maintain appropriate records of visitors and visiting speakers.

---

34. Online Safety

Online safety forms an integral part of safeguarding at Apex2100.

The School recognises that children may experience harm through:

- social media;
- messaging platforms;
- gaming;
- live streaming;
- online communities;

- image sharing;
- grooming;
- cyberbullying;
- sexual exploitation;
- extremist content;
- criminal exploitation;
- inappropriate or illegal material; and
- other online activity.

The School will provide age-appropriate education concerning online safety.

Students will be taught about:

- safe use of technology;
- privacy;
- online relationships;
- consent;
- respectful communication;
- cyberbullying;
- grooming;
- sexual exploitation;
- harmful content;
- reporting concerns;
- digital footprints; and
- responsible use of social media.

The School will maintain appropriate filtering and monitoring arrangements.

Apex2100 currently uses appropriate filtering and monitoring systems, including iBOSS where applicable, together with other technical controls recommended by its safeguarding and technology partners.

Filtering and monitoring arrangements will be reviewed regularly.

---

35. Children at Risk Online

The School recognises that some children may be particularly vulnerable to online harm.

This includes children with SEND, children experiencing social isolation and children who may be vulnerable to exploitation or radicalisation.

The School will provide additional support where required.

Staff should report concerns about online harm to the DSL or a DDSL.

Where online activity forms part of a safeguarding concern, the School will consider whether children's social care, police or other agencies should be involved.

---

36. Use of Reasonable Force

The School recognises that reasonable force may be required in limited circumstances to prevent harm.

Any use of reasonable force must be lawful, proportionate and necessary.

Staff must have regard to the individual circumstances of the child, including SEND, medical needs, disability and other vulnerabilities.

Positive behaviour support should be used wherever possible to reduce the likelihood of situations escalating.

The School's detailed arrangements for reasonable force are contained within its Behaviour Policy.

Any significant incident involving physical intervention must be recorded and reported in accordance with School procedures.

---

37. Equality and Non-Discrimination

Safeguarding arrangements will be applied fairly and without unlawful discrimination.

The School will have regard to the Equality Act 2010 and will make appropriate adjustments for children with disabilities or additional needs.

The School recognises that safeguarding risks may affect children differently and will consider individual circumstances when assessing risk and determining support.

---

38. Safeguarding Curriculum

The School will teach children how to keep themselves and others safe.

Safeguarding education will be embedded through appropriate curriculum, pastoral and wellbeing provision.

This may include:

- healthy relationships;
- consent;
- respectful behaviour;
- sexual harassment;
- sexual violence;
- online safety;
- bullying;
- exploitation;
- radicalisation;
- personal safety;
- emotional wellbeing;
- recognising abuse;
- reporting concerns;
- peer pressure;
- drugs and alcohol;
- appropriate use of technology; and
- resilience and critical thinking.

Students will be encouraged to understand that abuse is never their fault and that they should seek help if they are worried about themselves or another person.

---

39. Supporting Students Who Make a Safeguarding Disclosure

The School will take all disclosures seriously.

Students will be reassured that:

- they have been listened to;
- the School will take appropriate action;
- they are not responsible for the actions of an abuser;
- they will be supported; and
- information will only be shared where necessary to safeguard them or others.

The School will consider the child's wishes and feelings throughout the safeguarding process, while recognising that safeguarding professionals may need to take action where a child is at risk.

---

40. Supporting Children Following Safeguarding Incidents

The School will consider appropriate support for every child affected by a safeguarding incident.

Support may include:

- pastoral support;
- trusted adult support;
- counselling or therapeutic services;
- changes to accommodation;
- changes to classes or activities;
- adjustments to transport;
- additional supervision;
- support from the host school;
- referral to children's social care;
- healthcare support; and
- specialist external agencies.

The School will monitor the student's welfare and review arrangements as circumstances change.

---

41. Transfer of Safeguarding Information

Where a student leaves Apex2100, the DSL will ensure that relevant safeguarding information is transferred securely to the receiving educational institution where appropriate.

Child protection records will be transferred separately from the main student file where required.

The School will obtain confirmation of receipt where appropriate.

The DSL will consider whether safeguarding information should be shared with the receiving institution before the student's arrival so that appropriate support and protective measures can be put in place.

Information will be shared lawfully and proportionately.

---

42. Safeguarding Governance and Oversight

The Apex2100 Education Board has overall strategic responsibility for ensuring that effective safeguarding arrangements are in place.

Mike Buchanan, Chair of the Apex2100 Education Board and Designated Safeguarding Governor, provides Board-level oversight.

The DSL, **Dave Breen**, has operational lead responsibility for safeguarding and child protection.

The DDSLs, **Karen Thomas, Stuart Terris and Mark Tilston**, provide support and safeguarding cover.

The DSL will:

- maintain an overview of safeguarding;
- ensure appropriate records are maintained;
- liaise with host schools;
- liaise with children's social care, police and other safeguarding partners;
- support staff;
- ensure staff receive appropriate training;
- monitor safeguarding procedures;
- review safeguarding concerns and themes;
- contribute to risk assessments;
- ensure appropriate referrals are made;
- support information sharing;
- oversee child protection arrangements; and
- advise the Education Board and School leadership on safeguarding matters.

The lead responsibility for safeguarding remains with the DSL and is not delegated, although operational tasks may be undertaken by appropriately trained staff.

---

43. Availability of Safeguarding Leads

During School operations, the DSL or one of the DDSLs will be available to receive safeguarding concerns.

Where the DSL and DDSLs are unavailable, staff must not delay action.

Staff should contact an appropriate member of senior leadership and/or the relevant children's social care service.

For out-of-hours or out-of-term activities, the School will maintain arrangements for accessing an appropriate senior safeguarding contact and relevant emergency and statutory services.

---

44. Training

All staff receive safeguarding and child protection training appropriate to their role.

Training will include, where relevant:

- child protection;
- recognising abuse and neglect;
- responding to disclosures;
- child-on-child abuse;
- sexual violence and sexual harassment;
- online safety;
- Prevent and radicalisation;
- child criminal exploitation;
- serious violence;
- domestic abuse;
- attendance and children missing education;
- safeguarding children with SEND;
- professional boundaries;
- low-level concerns;
- whistleblowing;
- information sharing; and
- local safeguarding referral arrangements.

All new staff will receive safeguarding induction as soon as reasonably practicable and normally within seven working days of commencing work.

Induction will include access to:

- this safeguarding policy;
- the Staff Code of Conduct;
- Behaviour Policy;
- procedures for children missing from education;
- whistleblowing procedures;
- online safety and acceptable use procedures;
- information about the DSL and DDSLs; and
- relevant sections of KCSIE.

Staff will be required to read the appropriate parts of KCSIE and confirm that they have done so.

---

45. DSL and DDSL Training

The DSL and DDSLs will receive appropriate safeguarding training to enable them to fulfil their responsibilities.

The DSL will maintain knowledge and skills through regular updates and continuing professional development.

Training will cover, as appropriate:

- local safeguarding arrangements;

- child protection procedures;
- multi-agency working;
- children in need;
- child protection conferences;
- radicalisation and Prevent;
- online safety;
- harmful sexual behaviour;
- record keeping;
- allegations against staff;
- safer recruitment;
- safeguarding children with SEND;
- exploitation;
- contextual safeguarding; and
- emerging safeguarding risks.

The School will ensure that safeguarding leadership arrangements provide adequate cover throughout the School year.

---

46. Review of Safeguarding Arrangements

This policy will be reviewed at least annually.

The review will consider:

- changes in legislation;
- statutory guidance;
- local safeguarding arrangements;
- safeguarding incidents;
- referrals;
- complaints;
- low-level concerns;
- staff training;
- online safety;
- boarding/residential safeguarding;
- child-on-child abuse;
- lessons learned;
- audit findings; and
- recommendations from safeguarding partners.

Where a significant safeguarding incident occurs, the School will consider whether an immediate review is necessary.

The Education Board will receive appropriate safeguarding information to enable effective oversight and challenge.

Apex2100

47. Safeguarding Practice Reviews and Serious Incidents

The DSL will inform the relevant host school and safeguarding partners of incidents which may require consideration under local or national child safeguarding review arrangements.

Where a safeguarding practice review or other statutory review is undertaken, Apex2100 will cooperate fully.

Following a serious incident or substantiated allegation, the School will consider whether improvements are required to:

- policies;
- staff training;
- supervision;
- recruitment;
- risk assessment;
- reporting arrangements;
- online safety;
- boarding arrangements; or
- other safeguarding practice.

---

48. Confidentiality and Records Relating to Allegations

The School will make every reasonable effort to maintain confidentiality and prevent unnecessary publicity while safeguarding allegations are being investigated.

Records concerning allegations against staff will be retained in accordance with statutory requirements and the School's data retention arrangements.

Where an allegation is found to be malicious, the School will consider the appropriate action in accordance with current statutory guidance.

Allegations that are false, unfounded, unsubstantiated or malicious will be treated in accordance with current statutory guidance and employment law.

The School will ensure that references do not include inappropriate or unlawful information concerning allegations.

---

49. Working With Host Schools and Local Authorities

Because Apex2100 operates through relationships with host schools and students may be associated with different local authorities, the School will maintain close safeguarding links with each relevant host school.

The DSL will ensure that:

- safeguarding contacts are known;
- referral pathways are understood;
- local threshold documents are accessible;
- emergency arrangements are understood;
- information-sharing arrangements are established;
- concerns are appropriately escalated; and
- students receive consistent safeguarding support.

Where a concern involves a host school, Apex2100 will work collaboratively with the host school's DSL and relevant safeguarding partners.

---

50. Emergency Safeguarding Response

Where there is an immediate threat to a child's safety, staff should prioritise the child's immediate protection.

Depending on the circumstances, this may include:

- contacting the **emergency services**;
- contacting children's social care;
- moving the child to a safe environment;
- separating children where necessary and appropriate;
- contacting the DSL/DDSL;
- contacting the host school's safeguarding lead; and
- ensuring appropriate supervision.

Staff should not put themselves or others at unnecessary risk.

All emergency actions must be reported to the DSL or a DDSL as soon as practicable and recorded.

---

51. Review and Ratification

This policy will be reviewed annually as a minimum.

The review will be undertaken by the School's safeguarding leadership and presented to the Apex2100 Education Board for approval and ratification.

The policy will also be reviewed sooner where:

- legislation changes;
- statutory guidance changes;
- local safeguarding procedures change;
- there is a significant safeguarding incident;
- an inspection identifies an area requiring improvement; or
- the School identifies a material change in safeguarding risk.

Approved by: Apex2100 Education Board

Designated Safeguarding Lead: Dave Breen

Deputy Designated Safeguarding Leads: Karen Thomas, Stuart Terris and Mark Tilston

Designated Safeguarding Governor / Board Lead: Mike Buchanan

Date approved: _____

Date of next review: 1/10/2027

Chair of Education Board signature: _____

APPENDIX 1 – Types and Indicators of Abuse

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm.

Possible indicators include:

- unexplained injuries;
- injuries in unusual locations;
- repeated injuries;
- inconsistent explanations;
- fear of physical contact;
- flinching;
- reluctance to change clothing;
- aggression or withdrawal.

Emotional Abuse

Emotional abuse involves persistent emotional maltreatment that may cause serious and adverse effects on emotional development.

Indicators may include:

- low self-esteem;
- anxiety;
- withdrawal;
- extreme behaviour;
- fear;
- lack of confidence;
- self-harm;
- inappropriate emotional responses;
- difficulty forming relationships.

Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening.

It may occur online or offline.

Indicators may include:

- sexualised behaviour inappropriate for age;
- sexual knowledge beyond developmental expectations;
- fear of particular people;
- unexplained pregnancy or sexually transmitted infection;

- changes in behaviour;
- self-harm;
- withdrawal;
- sexually explicit online activity;
- disclosure of sexual contact.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs.

Indicators may include:

- poor hygiene;
- inadequate clothing;
- persistent hunger;
- untreated medical needs;
- persistent absence;
- tiredness;
- poor educational attendance;
- lack of supervision;
- unsafe living conditions.

APPENDIX 2 – Key Safeguarding Principles for Staff

Every member of staff should remember:

Recognise it.
Be alert to signs and changes in behaviour.

Listen.
Take children seriously.

Report it.
Tell the DSL or a DDSL without delay.

Record it.
Write down the facts accurately.

Share appropriately.
Do not allow confidentiality concerns to prevent safeguarding action.

Follow it up.
Do not assume someone else has dealt with the concern.

Challenge it.
If you believe a safeguarding response is inadequate, escalate the concern.

Protect the child.
The welfare and best interests of the child remain central to all safeguarding decisions.

APPENDIX 3 – Safeguarding Contact Summary

Apex2100 DSL

Dave Breen
Designated Safeguarding Lead
Telephone: +33 6 69 19 02 82
Email: dave.breen@apex2100.org

Apex2100 DDSLs

Karen Thomas
Deputy Designated Safeguarding Lead
Email: karen.thomas@apex2100.org

Stuart Terris
Deputy Designated Safeguarding Lead
Email: stuart.terris@apex2100.org

Mark Tilston
Deputy Designated Safeguarding Lead
Email: mark.tilston@apex2100.org

Board Safeguarding Lead

Mike Buchanan
Chair of Apex2100 Education Board and Designated Safeguarding Governor
Email: mike@positivelyleading.co.uk
Mobile: +44 (0)7941 093 102

External Safeguarding Support

NSPCC Whistleblowing Advice Line
0800 028 0285
help@nspcc.org.uk

Disclosure and Barring Service
03000 200 190
dbsdispatch@dbs.gov.uk

Teaching Regulation Agency
0207 593 5393
misconduct.teacher@education.gov.uk

Ofsted
0300 123 4666
Whistleblowing@ofsted.gov.uk

Department for Education – Counter Extremism
020 7340 7264
counter.extremism@education.gsi.gov.uk

Emergency situations: Contact the **emergency services** and/or the relevant children's social care service immediately, according to the circumstances.

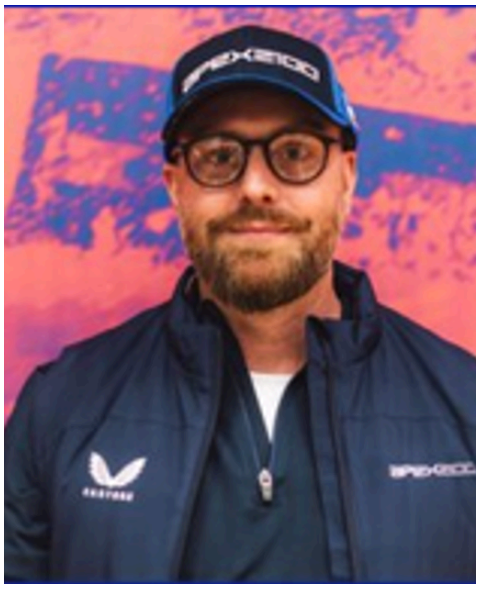
APPENDIX 4 – Review Timetable

Date of last central office review:	September 2026	Review Period:	1 year (minimum)
Date of next central office review:	September 2026	Owner:	Dave Breen
Date of next school level review:	September 2027		
Type of policy:	Central- website published	Educational Board	Policy requires Educational Board approval

APPENDIX 5 – Meet the Safeguarding Team

The DSL is:

Dave Breen



The DDSLs are:

Mark Tilston



Karen Thomas



Stuart Terris



APPENDIX 6 – Snowsports England Club

As a Club affiliated with Snowsports England, we will ensure a duty of care to all members of the club by adopting and implementing Snowsport England's safeguarding policies; SnowSafe Children and Young People and SnowSafe Adults and any future versions of these Policies.