

Safeguarding & Child Protection Policy

Sunbury Education Limited / Sunbury Online Sixth Form College / Maxwell

Document owner	Founder & Director (corporate safeguarding lead)
Applies to	All Sunbury Education Limited staff, contractors, volunteers, tutors, digital services and school-pilot activity involving children or young people
Status	Draft for formal adoption
Proposed effective date	15 October 2026
Review cycle	At least annually and after material legal, safeguarding, security or product changes
Next review	October 2027
Approval	To be approved and signed by the Founder & Director before reliance on this policy

1. Purpose and commitment

Sunbury Education Limited (SEL) is committed to safeguarding and promoting the welfare of children and young people. Safeguarding is everyone's responsibility. The welfare and best interests of the child take priority over commercial, operational or technical considerations.

This policy supplements SEL's Behaviour and Attendance Policy and College Charter. It applies to online education, tutoring, communications, admissions, Maxwell AI learning services, research or evaluation activity, and any pilot delivered with schools in England.

2. Principles

- Act in the best interests of the child and take a child-centred approach.
- Take all concerns seriously, act promptly and record decisions and actions proportionately.
- Do not promise confidentiality to a child where information may need to be shared to protect them.
- Share safeguarding information on a need-to-know basis and only when lawful, necessary and proportionate.

- Treat online harms, bullying, harassment, exploitation, grooming, sexual harm, self-harm risks and unsafe AI interactions as safeguarding matters where appropriate.
- Make reasonable adjustments and consider additional vulnerability arising from SEND, disability, language, communication needs or other barriers.
- Never allow AI or automation to make final safeguarding judgements, referrals or disciplinary decisions without authorised human oversight.

3. Roles and responsibilities

The Founder & Director is the corporate safeguarding lead unless responsibility is formally delegated in writing. This role is responsible for policy oversight, ensuring appropriate training, handling concerns, maintaining records, and coordinating with schools or statutory agencies where required.

Where SEL delivers a service or pilot within a school or college, the setting's Designated Safeguarding Lead (DSL) and safeguarding procedures take precedence for concerns about pupils in that setting. SEL staff must report concerns promptly to the school's DSL or deputy and follow the setting's agreed escalation route.

All staff, contractors and volunteers must understand this policy, complete safeguarding induction appropriate to their role, maintain professional boundaries, and immediately report concerns.

4. Recognising safeguarding concerns

Concerns may arise from disclosure, observation, behaviour, attendance, communications, platform activity, or information from another person. They can include:

- physical, emotional or sexual abuse; neglect; exploitation; domestic abuse; peer-on-peer abuse;
- bullying, cyberbullying, harassment, sexual harassment or harmful online behaviour;
- grooming, radicalisation, criminal or sexual exploitation;
- self-harm, suicidal statements, threats of serious harm or immediate danger;
- inappropriate adult-child contact, boundary violations or allegations about staff, tutors, contractors or volunteers;
- unsafe disclosure of personal information or material risks identified through digital or AI-supported services.

5. Responding to a concern or disclosure

1. Listen calmly. Do not investigate, interrogate, promise secrecy, or ask leading questions.
2. If there is immediate danger or a medical emergency, contact the appropriate emergency service without delay.
3. Record the concern factually as soon as possible, including date/time, source, what was said or observed, actions taken and the rationale for decisions.

4. For school-linked pupils, report without delay to the school's DSL/deputy using the school's agreed procedure.
5. For activity outside a partner school, the corporate safeguarding lead decides the appropriate referral/escalation route, including children's social care or police where required.
6. If the concern is about the corporate safeguarding lead, it must be escalated to another appropriate senior/independent person and, where applicable, the relevant local authority process.
7. Only share information necessary to safeguard the child and maintain a clear audit trail.

6. Online safeguarding and professional boundaries

- Use approved organisational communication channels for contact with learners.
- Do not use personal social-media accounts or private messaging for routine learner contact.
- Do not request or encourage unnecessary personal, health, family, location or other sensitive information from children.
- Staff must not form inappropriate relationships, exchange sexualised or discriminatory content, or communicate in a manner that could reasonably be interpreted as grooming or coercive.
- Live sessions and communications should operate in line with agreed supervision, recording, retention and parental/school arrangements.
- Concerns arising in Maxwell or another digital service must be routed to an authorised human; the service must not represent itself as an emergency or statutory safeguarding service.

7. Safer recruitment and suitability

SEL will use proportionate safer-recruitment measures for roles involving contact with children, including identity and employment checks, references, role-appropriate criminal-record checks where legally applicable, verification of qualifications where relevant, and clear expectations regarding conduct. No person should undertake regulated activity until required checks and organisational approval are complete.

8. Allegations and low-level concerns about adults

Any allegation or concern about the behaviour of a member of staff, contractor or volunteer towards a child must be reported immediately and handled separately from ordinary performance management. SEL will follow the applicable school, local-authority and statutory procedures, including referral to the Local Authority Designated Officer (LADO) where the threshold is met.

9. Information sharing and recordkeeping

Safeguarding records must be factual, timely, access-controlled and retained only for an appropriate period. Data protection law is not a barrier to necessary safeguarding information-

sharing. Where information is shared, SEL will record what was shared, with whom, why, by whom and when.

10. Training, monitoring and review

Safeguarding induction is required before staff or contractors have unsupervised contact with children or access to safeguarding information. Training will be refreshed periodically and when duties change. This policy will be reviewed at least annually and after a serious incident, material product change or relevant legal/guidance update.

11. Relationship with Maxwell

Maxwell is an educational support system, not a safeguarding professional or emergency service. AI-generated content may be incomplete or wrong. Maxwell must not autonomously determine abuse, risk severity, referral outcome, sanctions, or whether a child is safe. Human professionals remain responsible for safeguarding judgement and action.

References and related documents

Keeping Children Safe in Education 2026:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

KCSIE 2026 - part one overview: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2/part-one-overview-for-all-staff>

ICO Children's Code: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/>

Sunbury Behaviour & Attendance Policy:

<https://irp-cdn.multiscreensite.com/bea0b6dc/files/uploaded/Behaviour-and-Attendance-Policy.pdf>

Approval

Name

Seyed Mostafa Owji

Role

Founder & Director

Signature

Date

This policy becomes effective when approved and dated by the authorised signatory.