

Child Protection / Safeguarding and Promoting the Well-Being of Children and Young People Policy

Pledge2Learn

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Designated Safeguarding Lead (DSL)	Emma Gill DSL
Deputy Designated Safeguarding Lead (s) (DDSLs)	Callum Cutillo DDSL
Named Board Member: Safeguarding	Ellen Chant

Safeguarding and Child Protection Policy

Pledge2Learn — Academic Year 2026–27

In force from 1 September 2026

Policy control

Setting	Pledge2Learn, Bottesford Town Football Club, Scunthorpe
Registered address	Suite 6, Haldenby House, Berkeley Business Centre, Doncaster Road, Scunthorpe, DN15 7DQ
Policy owner	Emma Gill, Designated Safeguarding Lead
Approved by	The Proprietor Body
Chair of the Proprietor Body	Patrick Lappin
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Designated Safeguarding Lead	Emma Gill — safeguarding@pledge2learn.co.uk
Deputy DSL and Online Safety Lead	Callum Cutillo — safeguarding@pledge2learn.co.uk
Head of School	Holly Dickinson — holly@pledge2learn.co.uk
Advisory Board member with safeguarding responsibility	Ellen Chant — ellen@pledge2learn.co.uk
Chair of the Advisory Board	Richard Giles — richard@pledge2learn.co.uk
Feedback and Complaints Co-ordinator	Sam Batty — sam@pledge2learn.co.uk
Safeguarding recording system	MyConcern
Status	Statutory. Published on the Pledge2Learn website. Annexes 1, 4, 5 and 6 are operational documents held internally and are available on request.

Terminology used in this policy. Pledge2Learn uses the term **student** for the children and young people who attend. Where statutory guidance uses “pupil” or “child”, the meaning is the same. **Child** means anyone under the age of 18. The **Proprietor Body** is the proprietor

for the purposes of the Education (Independent School Standards) Regulations 2014. The **Advisory Board** exercises delegated oversight on behalf of the Proprietor Body; where statutory guidance refers to a “governing body”, the Advisory Board and Proprietor Body together discharge that function.

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Part A — Statement, scope and statutory framework

1. Purpose and scope

1.1 The purpose of this policy is to:

- set out how Pledge2Learn safeguards and promotes the welfare of every student;
- make clear the roles and responsibilities of everyone connected with the setting;
- give staff unambiguous procedures to follow when they are worried about a student;
- ensure appropriate action is taken in a timely way; and
- ensure all staff understand their statutory responsibilities and are trained to recognise and report concerns.

1.2 This policy applies to all staff, whether permanent, temporary, agency or supply; to the Head of School and senior leaders; to members of the Advisory Board and the Proprietor Body; to volunteers; to contractors; to visitors; and to anyone else working at or on behalf of Pledge2Learn. It applies on site, off site, on educational visits, during transport arranged or commissioned for students, in remote or online provision, and in any activity carried out in the name of Pledge2Learn.

1.3 Our provision. Pledge2Learn is a **registered independent school** providing alternative provision for children of compulsory school age in Key Stage 3 and Key Stage 4, including students with Education, Health and Care plans. Students are admitted on a rolling basis. We provide for two distinct cohorts, and the difference between them determines where safeguarding responsibility sits:

- **Registered students.** Students admitted **full time onto the Pledge2Learn admission register**. For these students Pledge2Learn is the school. We hold **sole and primary** responsibility for safeguarding, for the admission and attendance registers, for the child protection file, and for all statutory duties owed by a school to a registered pupil.
- **Commissioned students.** Students who attend on a **part-time basis** to support engagement and assessment, and who remain on the roll of a mainstream school or are placed by the local authority. These students are **dual registered**. The home school or placing authority retains overall safeguarding responsibility, and **we share responsibility for the student while they are with us**.

1.4 Every duty in this policy applies to both cohorts. Where a duty falls differently depending on cohort, this policy says so expressly. Section 37 sets out our arrangements with commissioning schools and the local authority; Section 38 sets out the additional duties we owe to students on our own roll.

1.5 All staff must know, for every student they work with, which cohort that student belongs to, who the DSL of record is, and who must be notified of a concern. This is recorded on MyConcern against each student and confirmed at induction and at every placement review.

1.6 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with a student and their family has a role to play. All staff take a child-centred approach, which means considering at all times what is in the best interests of the student.

2. Statutory framework

2.1 This policy is issued under, and must be read alongside, the following.

<u>Instrument</u>	<u>Effect on Pledge2Learn</u>
Education (Independent School Standards) Regulations 2014 (as amended)	Places a duty on the proprietor of an independent school to ensure that arrangements are made to safeguard and promote the welfare of students, and that those arrangements have regard to guidance issued by the Secretary of State. This is the primary legal basis for this policy.
Keeping Children Safe in Education 2026 (in force 1 September 2026)	Statutory guidance we must have regard to. Referenced throughout by paragraph and page.
Working Together to Safeguard Children 2026	Statutory multi-agency guidance, including the Family Help framework and safeguarding partner arrangements.
Children Act 1989 , ss17, 20, 31 and 47	Thresholds for children in need, accommodation, care and supervision orders, and significant harm.
Children Act 2004 , ss10, 11, 16E	Co-operation duties, the duty to safeguard, and multi-agency safeguarding arrangements.
Children's Wellbeing and Schools Act 2026 (c.21)	New information sharing duty and consistent child identifier; multi-agency child protection teams; children not in school registers; strengthened regulation of independent educational institutions, including a fit and proper person test, a power to suspend registration, and new material change categories.
Crime and Policing Act 2026	Mandatory reporting duty for child sexual abuse (awaiting commencement); offence of preventing a report; removal of the supervision exemption from the definition of regulated activity.
Education Act 2002 , s175 / s157	Safeguarding duties on education settings. Section 157 applies to independent schools.
Education (Pupil Registration) (England) Regulations 2006 (as amended)	Requires us to keep an admission register and an attendance register for every registered student, to record dual registration, and to notify the local authority when a student is added to or deleted from the admission register at non-standard points.
Equality Act 2010 and Human Rights Act 1998	Non-discrimination, reasonable adjustments, and Articles 3, 8 and 14 and Protocol 1 Article 2 ECHR.

<u>Instrument</u>	<u>Effect on Pledge2Learn</u>
Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025	Together, the “data protection laws” as defined in KCSIE 2026.
Counter-Terrorism and Security Act 2015, s26	The Prevent duty.
Female Genital Mutilation Act 2003, s5B	Personal reporting duty on teachers.
Safeguarding Vulnerable Groups Act 2006, s35	Duty to refer to the Disclosure and Barring Service.
Terrorism (Protection of Premises) Act 2025 (“Martyn’s Law”)	Premises preparedness duties.

2.2 This policy is consistent with the published arrangements of the North Lincolnshire safeguarding partners, the [Children’s Multi-Agency Resilience and Safeguarding \(MARS\) partnership](#). It does not replace MARS policies and procedures, which take precedence on multi-agency processes. Where a student is placed by another local authority, we also follow that authority’s referral arrangements.

2.3 Inspection. Under the inspection framework in force from 10 November 2025, and applied to non-association independent school inspections from January 2026, safeguarding is reported separately as **met** or **not met**. There is no intermediate outcome. The Proprietor Body treats sustained compliance, not remediation after the event, as the standard.

2.4 Regulatory consequences. The Proprietor Body notes that under the Children’s Wellbeing and Schools Act 2026 the Secretary of State may suspend the registration of an independent educational institution for up to twelve weeks where there is evidence of a risk of harm to students, during which the institution must cease operating; that individuals participating in management must satisfy a broader **fit and proper person** test which may not be met even where all formal checks are passed; and that on any appeal against deregistration the proprietor must establish likely **future** compliance and not only compliance at the date of the appeal.

3. Definitions

Safeguarding and promoting the welfare of children means: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether within or outside the home, including online; preventing the 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. (*KCSIE 2026, para 3, p8.*)

Child protection is the part of safeguarding concerned with protecting individual children who are suffering, or are likely to suffer, significant harm.

Child means anyone under the age of 18.

Harm means ill-treatment or the impairment of health or development, including impairment suffered from seeing or hearing the ill-treatment of another.

Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. It replaces the former term "early help" in statutory guidance. Support sits on a continuum: universal services; **community-based Early Help assessment**; the **targeted early help level of Family Help** under ss10 and 11 of the Children Act 2004; **statutory services under s17** of the Children Act 1989 (children in need); and **s47 enquiries** where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm. (*KCSIE 2026, paras 6, 13, 17, 58, 62.*)

Children in care and care experienced are the terms Pledge2Learn uses in its own records and reports in place of "looked-after children", except where quoting statutory guidance directly.

Extra-familial harm means abuse or exploitation occurring in contexts outside the family, including sexual abuse, exploitation and harassment, abuse in a young person's own intimate relationships, criminal exploitation including financial exploitation, serious youth violence, county lines and radicalisation. (*KCSIE 2026, para 20, p12.*)

Alternative provision (AP) means education arranged for students who are not attending mainstream school full time. Pledge2Learn provides an alternative provision offer.

MyConcern is the electronic safeguarding recording system used by Pledge2Learn. It is the only system on which safeguarding concerns are recorded.

4. Our safeguarding culture

4.1 Our values are summarised by the acronym **GRIT** — Gratitude, Respect, Integrity and Teamwork. Safeguarding is how those values are expressed in practice.

4.2 We create a culture in which:

- students feel safe, and know there are adults they can talk to if they are worried;
- students are equipped through the curriculum with the knowledge and skills to keep themselves and others safe;
- staff maintain an attitude of "**it could happen here**" (*KCSIE 2026, para 55, p20*);
- staff exercise **professional curiosity** and do not assume that another colleague or agency will act (*KCSIE 2026, paras 16, 60*);
- staff feel able to raise concerns about poor or unsafe practice, and know those concerns will be taken seriously;
- inappropriate behaviour between students is challenged and never dismissed as "banter", "having a laugh", "part of growing up" or "boys being boys" (*KCSIE 2026, para 32, p15*); and

- no student is ever made to feel they are creating a problem, or made to feel ashamed, by reporting abuse (*KCSIE 2026, para 15, pp10–11*).

4.3 We recognise that many of our students arrive having experienced disrupted education, exclusion, or harm, and that this may present as challenging behaviour. We take a trauma-informed approach. Behaviour is treated as communication and is responded to under our Behaviour Policy alongside, not instead of, this policy.

5. Equality, inclusion and additional vulnerability

5.1 We must not unlawfully discriminate against students or staff because of sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation. We make reasonable adjustments for disabled students. (*Equality Act 2010; KCSIE 2026, paras 90–94, pp29–31.*)

5.2 We are alert to disproportionate vulnerability and integrate that awareness into our procedures, records and training. Good record keeping and monitoring of all forms of abuse and harassment is essential to this. Some students face additional barriers to recognising or disclosing abuse. We give particular consideration to students who:

- are disabled, have special educational needs or have an Education, Health and Care plan;
- have a health condition with specific additional needs;
- have a mental health need;
- are young carers;
- are pregnant, or are parents themselves;
- have exhibited early signs of abusive, violent or harmful behaviour;
- are showing signs of being drawn into anti-social or criminal behaviour, gang involvement, organised crime or county lines;
- are frequently missing, or go missing, from education, home or care;
- have been repeatedly removed from the classroom, have experienced multiple suspensions, are on a part-time timetable, or are at risk of permanent exclusion;
- are at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation;
- are at risk of being radicalised into terrorism;
- have a parent or carer in custody, or are affected by parental offending;
- live in a family circumstance presenting challenges, such as drug or alcohol misuse, adult mental health difficulty or domestic abuse;
- are misusing alcohol or other drugs themselves;
- are at risk of so-called honour-based or faith-based abuse, including female genital mutilation or forced marriage;
- are privately fostered or in a kinship care arrangement;
- are children in care or care experienced;
- are asylum seekers, refugees, or have English as an additional language;
- are living in temporary accommodation;

- are questioning their gender; or
- may experience discrimination on the grounds of race, ethnicity, religion, gender identity or sexuality.

(KCSIE 2026, para 17, pp11–12, and “Children potentially at greater risk of harm”, pp56–70.)

5.3 SEND and communication. A high proportion of our students have SEND. We recognise that behavioural, communication and sensory presentations can mask abuse; that students may be less able to report; and that indicators may be wrongly attributed to a student’s condition. Staff never assume a change in presentation is explained by a student’s needs. Where a student communicates differently, the DSL ensures the student’s voice is captured in a way that works for them and records how this was done.

5.4 Interpreters. Where a student or family requires interpretation in relation to a welfare or child protection matter, we use a recommended professional interpreting service. We do not use family members, other students, or bilingual staff who are not trained interpreters, for safeguarding conversations.

6. Working in partnership with students and parents

6.1 The student’s welfare is paramount. Good outcomes nevertheless depend on an open, honest working relationship with parents and carers. We will make every effort to maintain that relationship while fulfilling our duty to protect.

6.2 We follow the four principles for working with parents and carers set out in Working Together to Safeguard Children 2026: building strong, positive, trusting and co-operative relationships; communicating in a respectful, non-blaming, clear and inclusive way adapted to the needs of parents and carers; empowering parents and carers to participate in decisions by giving them information, keeping them updated and directing them to further resources; and involving parents and carers in the design of processes and services that affect them.

6.3 We will normally discuss concerns with parents before making a referral. We will **not** do so where this may place a student at risk of significant harm, impede a police investigation, or place a member of staff or another person at risk. The decision, and the reasons for it, are recorded on MyConcern by the DSL.

6.4 Students will be given an explanation appropriate to their age and understanding of what action is being taken on their behalf and why. The student’s wishes and feelings are taken into account in determining what action to take and what support to provide *(KCSIE 2026, para 118, p34)*, and are recorded.

Part B — Governance, leadership and accountability

7. The Proprietor Body

7.1 The Proprietor Body is the proprietor for the purposes of the Education (Independent School Standards) Regulations 2014 and holds ultimate statutory responsibility for ensuring that arrangements are made to safeguard and promote the welfare of students, having regard to KCSIE 2026. (*KCSIE 2026, para 82, p28.*)

7.2 The Proprietor Body will:

- approve this policy before publication, and approve it at least annually thereafter or sooner if legislation or guidance changes;
- ensure that the Advisory Board is properly constituted, informed and able to provide strategic challenge;
- ensure that all individuals participating in the management of Pledge2Learn satisfy the required checks — identity, enhanced DBS with barred list information, a prohibition from management (s128) check and, where applicable, a prohibition from teaching check — and are able to satisfy the **fit and proper person** test under the Children’s Wellbeing and Schools Act 2026;
- ensure sufficient resource, time, training and funding is allocated to the DSL and Deputy DSL to discharge their roles;
- receive the annual safeguarding report and the annual safeguarding self-evaluation;
- act as the escalation point for any concern or allegation about the Head of School; and
- ensure that our entry on the register of independent schools remains accurate as to age range, number of students, sex of students and premises, and that any **material change requiring prior approval** — including a change to the buildings made available for student use for a period of six months or more, a change to whether Pledge2Learn is a special institution, and any change to the types of special educational need for which special educational provision is made — is applied for **before** the change is made; and
- keep under review whether the balance of full-time and part-time provision remains consistent with our registration, noting that under the Children’s Wellbeing and Schools Act 2026 whether education is “full time” is assessed by whether a child could reasonably be expected to receive all or the majority of their education here, taking account of hours per week, weeks per year and time of day.

7.3 The Chair of the Proprietor Body is **Patrick Lappin**. Concerns or allegations about the Head of School are referred to him and, where the harm threshold may be met, to the Local Authority Designated Officer within one working day. (*KCSIE 2026, para 76, p25.*)

8. The Advisory Board

8.1 The Advisory Board provides strategic oversight of safeguarding on behalf of the Proprietor Body. **Ellen Chant** is the Advisory Board member with designated responsibility for safeguarding. **Richard Giles** is the Chair.

8.2 All members of the Advisory Board and the Proprietor Body will:

- read Keeping Children Safe in Education 2026 in full;
- receive safeguarding and child protection training, including online safety, at induction, updated regularly, equipping them to provide strategic challenge and to test and assure themselves that arrangements are effective (*KCSIE 2026, para 85, p28*); and
- hold an enhanced DBS certificate with barred list information where they are in regulated activity, together with a s128 prohibition from management check.

8.3 The Advisory Board will assure itself that:

- this policy is in place, compliant, reviewed annually, published, and consistent with the arrangements of the safeguarding partners;
- the Single Central Record is accurate and maintained in line with Part three of KCSIE 2026 and the Independent School Standards, and is checked termly by the named Advisory Board member with the outcome minuted;
- a Staff Behaviour Policy / Code of Conduct is in place covering low-level concerns, allegations against staff, whistleblowing, acceptable use of technology, staff–student relationships and communications including social media (*KCSIE 2026, para 121, p35*);
- a Behaviour Policy is in place including measures to prevent bullying, cyberbullying and prejudice-based and discriminatory bullying;
- appropriate arrangements are in place to respond to students absent from education, particularly on repeat occasions or for prolonged periods;
- safer recruitment procedures are embedded and effective, and at least one member of every recruitment panel has completed safer recruitment training;
- appropriate filtering and monitoring systems are in place and their effectiveness is reviewed at least once every academic year, with the review recorded;
- an annual online safety review and risk assessment is carried out;
- the premises meet the requirements at Section 25 of this policy;
- a Prevent risk assessment is in place and reviewed annually;
- the DSL and Deputy DSL have appropriate status, authority, time, training, resource and supervision;
- safeguarding requirements are included as a condition of use in any agreement transferring control of the premises, with failure to comply leading to termination (*KCSIE 2026, “Use of school or college premises for non-school/college activities”, p54*); and

- there is a route for students, staff and parents to raise concerns, and that safeguarding is a standing item at every Advisory Board meeting.

9. The Head of School

9.1 Holly Dickinson is the Head of School. She will ensure that:

- the policies and procedures adopted by the Proprietor Body are fully implemented and followed by all staff (*KCSIE 2026, para 82, p28*);
- sufficient time and resource is allocated to the DSL and Deputy DSL, including for strategy discussions, inter-agency meetings and contributing to assessments;
- safeguarding supervision is provided for the DSL and Deputy DSL;
- all staff and volunteers feel able to raise concerns about poor or unsafe practice, and that such concerns are addressed sensitively, effectively and promptly;
- concerns or allegations about a member of staff, supply staff, trainee, volunteer or contractor are considered by her without delay and referred to the LADO within one working day where the harm threshold may be met;
- serious child safeguarding incident notifications are made to the safeguarding partners and, where the criteria are met, a request is made for a case to be considered for a local child safeguarding practice review;
- referrals are made to the Disclosure and Barring Service and, where relevant, to the Teaching Regulation Agency where a person is dismissed, or would have been dismissed had they not resigned, because of harm or risk of harm to a child;
- there is always DSL or Deputy DSL cover during the operational day, and robust cover arrangements for periods of illness, leave or absence, including a confidential shared mailbox monitored so that concerns are received, monitored and acted on without delay (*KCSIE 2026, para 127, p37*); and
- all staff complete safeguarding training and induction as set out at Section 12.

10. The Designated Safeguarding Lead

10.1 The Designated Safeguarding Lead is **Emma Gill**. The Deputy DSL and Online Safety Lead is **Callum Cutillo**, trained to the same standard. The DSL is an appropriate senior member of staff drawn from the leadership team, and the role is explicit in her job description. Lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems in place, cannot be delegated. (*KCSIE 2026, paras 125–129, pp36–37; Annex B, pp181–188.*)

10.2 The DSL will:

- act as the source of support, advice and expertise for all staff;
- read KCSIE 2026 in full, including Annex A (*Further information*, p155) and Annex B (*Role of the designated safeguarding lead*, p181);
- act as the point of contact with the safeguarding partners and contribute to multi-agency arrangements;

- manage referrals to children’s social care, the police, the Channel programme and the Disclosure and Barring Service, and refer cases where a crime may have been committed to the police, having regard to *When to call the police: guidance for schools and colleges*;
- keep the Head of School informed of ongoing s47 enquiries and police investigations, including the requirement for a child to have an Appropriate Adult under PACE Code C;
- liaise with staff on matters of safety, welfare and wellbeing, including online safety, and with the senior mental health lead and, where available, the Mental Health Support Team, where concerns are linked to mental health;
- take lead responsibility for promoting the educational outcomes of students who have or have had a social worker, ensuring the setting knows who that cohort is, understanding their progress and attainment, and maintaining high aspirations for them;
- ensure the setting knows which students are children in care or care experienced, and liaise with the Virtual School Head and the student’s social worker;
- ensure child protection files are maintained, transferred and retained as set out at Section 20;
- oversee the safeguarding elements of transitions in and out of Pledge2Learn, including information exchange with the commissioning school;
- undertake DSL training at least every two years, with knowledge and skills updated at least annually, and keep up to date with developments including through the safeguarding partners;
- raise awareness of this policy, ensure it is reviewed annually and that it is understood and used;
- ensure the student voice informs safeguarding practice; and
- undertake the annual safeguarding self-evaluation and report to the Advisory Board each term and to the Proprietor Body annually.

11. All staff, volunteers, contractors and visitors

11.1 All staff will:

- read **Part one of Keeping Children Safe in Education 2026 in full** and sign to confirm they have read and understood it. This applies to **every** member of staff, including those who do not work directly with students. The condensed Annex A that previously existed has been withdrawn; the “Part one: Overview for all staff” document is a quick-reference aid only and does not replace reading Part one (*KCSIE 2026, “Who this guidance is for”, p7*);
- read and sign to confirm they understand this policy, the Staff Behaviour Policy / Code of Conduct and the Behaviour Policy;
- know who the DSL and Deputy DSL are and how to contact them;
- act immediately on any concern about a student’s welfare, and always in the student’s best interests;

- report concerns to the DSL or Deputy DSL **immediately and on the same day**, and always record on MyConcern;
- never promise a student that they will not tell anyone about a report of abuse;
- never carry out an investigation, and never delay taking action because they are unsure;
- report any concern or allegation about another adult, however small, to the Head of School — or, where it concerns the Head of School, to the Chair of the Proprietor Body;
- share low-level concerns in accordance with Section 41;
- maintain confidentiality, involving only those who need to be involved; and
- challenge behaviour between students that is abusive in nature.

11.2 Where the DSL and Deputy DSL are both unavailable, this must not delay action. Staff should speak to a member of the senior leadership team or take advice directly from local authority children's social care, and share what was done with the DSL as soon as practicable. (*KCSIE 2026, para 59, p21.*)

11.3 Volunteers and contractors receive a safeguarding induction proportionate to their role, including how to report a concern and who the DSL is, before they begin. They are never left in sole, unsupervised charge of students unless they have been checked as being in regulated activity. See Section 40.

11.4 Visitors report to reception, sign in, are identified by badge, are made aware of how to report a safeguarding concern, and are not left unsupervised with students. External speakers and providers are assessed in advance for suitability, including under the Prevent duty.

12. Training and induction

12.1 All staff receive safeguarding and child protection training at induction, including online safety and an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring. Training is regularly updated. All staff receive safeguarding updates at least annually, and more frequently as required. (*KCSIE 2026, paras 12, 151–155, pp41–42.*)

12.2 Induction includes: this policy; the Behaviour Policy; the Staff Behaviour Policy / Code of Conduct, including low-level concerns, allegations and whistleblowing; our response to students absent from education; the role and identity of the DSL and deputies; Part one of KCSIE 2026; and how to use MyConcern.

12.3 Training covers, as a minimum: the four categories of abuse and their indicators; child-on-child abuse, including harmful sexual behaviour, sexual violence and sexual harassment, misogyny and misandry; extra-familial harm, criminal and sexual exploitation, county lines and serious violence, including weapons; domestic abuse; mental health, self-harm and suicidal ideation; radicalisation and the Prevent duty; online safety, including nudes and semi-nudes, AI-generated images and filtering and monitoring; children with SEND and additional barriers to disclosure; the safeguarding of children in care and care

experienced students; record keeping and information sharing; and the mandatory reporting duties at Section 16.

12.4 The DSL and Deputy DSL undertake formal DSL training at least every two years and refresh their knowledge and skills at least annually. Members of the Advisory Board and Proprietor Body receive training at induction, updated regularly.

12.5 Staff who undertake safer recruitment must complete safer recruitment training; at least one member of every recruitment panel must hold it.

12.6 The Proprietor Body recognises the expertise staff build through training and daily practice, and provides opportunity for staff to contribute to and shape safeguarding arrangements and this policy (*KCSIE 2026, para 153, pp41–42*).

13. Self-evaluation and review

13.1 The DSL completes an annual safeguarding self-evaluation covering culture, casework quality, training compliance, single central record compliance, filtering and monitoring, premises, student voice and multi-agency working. It is reported to the Advisory Board and the Proprietor Body with an action plan.

13.2 This policy is reviewed at least annually, and immediately where legislation, statutory guidance, a serious incident, a local child safeguarding practice review or a change in our provision requires it. Lessons learned from incidents and from practice reviews are reflected in the next revision.

Part C — Identifying and responding to concerns

14. What all staff should look out for

14.1 All staff must be aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that students can be at risk of harm inside and outside the setting, inside and outside the home, and online. Abuse, neglect and exploitation are rarely standalone events and cannot be captured by a single label; in most cases multiple issues overlap. (*KCSIE 2026, paras 18–19, p12.*)

14.2 The four categories of abuse are **physical abuse**, **emotional abuse**, **sexual abuse** and **neglect**. Full definitions and indicators are at **Annex 3**. Staff should also be aware that children may cause harm to other family members, often referred to as child-to-parent or care-giver abuse. (*KCSIE 2026, paras 24–28, pp13–14.*)

14.3 Technology is a significant component in many safeguarding issues. Students are at risk online as well as face to face, and in many cases abuse takes place concurrently online and offline. Students can abuse other students online, including through abusive, harassing and misogynistic or misandrist messages, the non-consensual making or sharing of nudes

or semi-nudes, especially in chat groups, and the sharing of abusive images and pornography with those who do not want to receive it. (*KCSIE 2026, paras 21–22, pp12–13.*)

14.4 The following behaviours and indicators can be signs that students are at risk: drug taking or alcohol misuse; unexplainable or persistent absence from education; serious violence, criminal exploitation including that linked to county lines, and radicalisation; and the consensual and non-consensual making or sharing of nudes or semi-nudes. (*KCSIE 2026, para 29, p14.*) Further detail on specific safeguarding issues is at **Annex 2**.

14.5 Concerns staff must act on immediately. Staff must report to the DSL on the same day, without exception:

- any injury, mark or bruise not readily attributable to normal knocks or scrapes;
- any explanation that appears inconsistent, changing or implausible;
- any behaviour giving rise to a suspicion that a student may have suffered harm;
- any concern about inadequate care, ill-treatment or emotional maltreatment;
- any indicator of abuse or neglect, including abuse linked to faith or belief;
- any significant change in a student's presentation, including non-attendance;
- anything a student says, or partially says, that suggests abuse by any person;
- any concern about a person who may pose a risk to children;
- any indicator of criminal or sexual exploitation, modern slavery or trafficking;
- any indicator of extra-familial harm;
- any indicator of domestic abuse, including a student's own intimate relationship;
- any indicator of radicalisation;
- any concern that a student is carrying, has used, or intends to use a weapon;
- any concern about a student's mental health that may be a safeguarding concern, including self-harm or suicidal ideation;
- any disclosure of, or discovery of, female genital mutilation (see Section 16); and
- any concern that a student is being sexually abused (see Section 16).

14.6 Where staff are unsure, they must always speak to the DSL or Deputy DSL. (*KCSIE 2026, para 23, p13.*)

15. Responding when a student tells you something

15.1 Staff do not investigate. They gather enough information to enable the DSL to make an informed decision, and no more.

15.2 Staff will:

- listen, take what is said seriously, and give the student their full attention;
- avoid the student having to repeat the account to another member of staff;
- keep questions to a minimum and use open questions — “Tell me”, “Explain to me”, “Describe to me”;
- not show shock, horror or surprise, and not express judgement about any person alleged to have caused harm;

- not put words into the student's mouth or suggest explanations;
- explain sensitively that they have a responsibility to pass the information to the DSL, and that they cannot keep it confidential where there are concerns about the student's safety or someone else's;
- reassure and support the student, and make clear they were right to speak up;
- explain what will happen next and who will be involved;
- speak to the DSL immediately and not leave the student alone or unsupported; and
- record the same day on MyConcern, in the student's own words where possible, distinguishing fact from opinion and hearsay, and recording any visible injury on a body map (**Annex 4**) — without photographing the student.

15.3 Language. Records may be read by the student in the future, and by other agencies. Staff use child-centred, trauma-informed and non-victim-blaming language. We do not use language that implies a student has consented to their own abuse or exploitation. (*KCSIE 2026, para 72, p24.*)

16. Mandatory reporting duties

16.1 Female genital mutilation. Where a **teacher**, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under 18, the teacher **must personally report this to the police**. This is a personal statutory duty under s5B of the Female Genital Mutilation Act 2003 and is **not** discharged by reporting to the DSL alone, although the DSL must also be informed immediately and will support the teacher to make the report. The duty applies where the teacher is informed by the girl that an act of FGM has been carried out on her, or observes physical signs appearing to show that FGM has been carried out. All other staff who have any concern about FGM, including risk of FGM, must report to the DSL, who will make a referral. (*KCSIE 2026, para 44, p18, and p173.*)

16.2 Mandatory reporting of child sexual abuse. The Crime and Policing Act 2026 creates a statutory duty on individuals undertaking relevant activity with children to report child sexual abuse to the police or local authority children's social care where they are told about it by the child or by the person who committed it, or where they witness it. The Act also creates a criminal offence, punishable by up to seven years' imprisonment, of conduct intended to prevent a report being made, and provides that failure to comply with the duty is a behaviour that may lead to inclusion in the children's barred list.

16.3 The duty awaits commencement and supporting statutory guidance. Pledge2Learn's position in the interim, and from commencement, is that:

- any staff member to whom child sexual abuse is disclosed by a student or by a perpetrator, or who witnesses it, must report to the DSL **immediately and on the same day**;
- the DSL will make the report to the police and children's social care as soon as reasonably practicable, and will record on MyConcern who made the report, to whom, when, and the reference given;
- a member of staff who has reported to the DSL may satisfy themselves that the external report has been made, and may make it themselves if they have any doubt

that it will be. No member of staff will ever be criticised or disadvantaged for making an external report directly;

- no manager, leader, Advisory Board member or member of the Proprietor Body may discourage, delay or obstruct a report. Any attempt to do so will be treated as gross misconduct and referred to the LADO and the police; and
- this section will be updated, and staff retrained, when the duty is commenced and the statutory guidance is published.

16.4 These duties sit alongside, and do not replace, the duty on all staff to report every safeguarding concern to the DSL.

17. Support before statutory intervention: Family Help

17.1 Any student may benefit from support before statutory intervention, from universal services, from community-based Early Help, or from the targeted early help level of Family Help. Staff should be alert to the groups listed at Section 5.2. (*KCSIE 2026, para 18, pp11–12.*)

17.2 Where a student does not require statutory children’s services, the DSL will generally lead liaison with other agencies and arrange an inter-agency assessment as appropriate. Staff may be asked to support that assessment and in some cases to act as lead practitioner. Cases are kept under constant review, and consideration is given to referral to children’s social care where the situation does not improve or worsens. (*KCSIE 2026, para 62, pp22–23.*)

17.3 Assessments consider how the needs of different family members affect each other, including education, mental and physical health, financial stability, housing, substance use and offending, and take account of disability, first language, fathers and male carers, and parents who identify as LGBT+.

17.4 We work with the North Lincolnshire Family Hubs, the One Family Approach and voluntary and community organisations to make support available early.

18. Action by the DSL

18.1 On receiving a concern, the DSL (or Deputy DSL) will consider:

- any urgent medical need, and whether emergency services are required;
- whether the student is subject to a child protection plan, is a child in need, or is receiving Family Help;
- what is already known, including from MyConcern chronology and from the commissioning school;
- the student’s wishes and feelings;
- whether consent to share has been obtained, or whether the concerns override the need for consent;
- whether to discuss the matter with parents, and whether doing so would place the student at risk or impede an investigation;

- whether other agencies already involved should be consulted; and
- whether the concern also constitutes an allegation about an adult (Section 42) or requires a mandatory report (Section 16).

18.2 The DSL will then decide to:

- manage support internally through our pastoral processes;
- undertake or contribute to a Family Help assessment; or
- **make a referral to statutory services** — where a student is suffering, or is likely to suffer, harm, a referral to local authority children's social care and, where appropriate, the police, must be made **immediately**, following the local referral process. (*KCSIE 2026, para 63, p23.*)

18.3 Referral route. Referrals in North Lincolnshire are made to the **Single Point of Contact on 01724 296500**. Where a student is placed by another local authority, the DSL refers to that authority's front door, and informs North Lincolnshire where the student resides in the area. All referrals are confirmed in writing the same day.

18.4 Within one working day a social worker should acknowledge receipt and decide next steps. If that information is not forthcoming the DSL will follow it up. If, after a referral, the student's situation does not appear to be improving, the DSL will follow the MARS escalation and resolution procedure. (*KCSIE 2026, paras 68–71, pp23–24.*)

18.5 After referral, the DSL or another appropriate member of staff will: maintain regular contact with the allocated social worker; contribute to strategy discussions; provide a report for, attend and contribute to any child protection conference and core group; contribute to and implement any child protection plan; share reports with parents in advance of meetings wherever possible and capture the student's wishes and feelings; and escalate through the MARS escalation and resolution procedure where we disagree with a decision and concerns remain.

18.6 Serious incidents. Where the criteria are met, the DSL will complete a serious child safeguarding incident notification to the safeguarding partners and, where appropriate, request that a case is considered for a local child safeguarding practice review.

18.7 Multi-agency child protection teams. Under the Children's Wellbeing and Schools Act 2026 the safeguarding partners must establish one or more multi-agency child protection teams to support the local authority in discharging its s47 duties. The DSL will work with the team as part of s47 enquiries and will update this policy and brief staff as local arrangements are confirmed.

19. Recording

19.1 All concerns, discussions, decisions and the reasons for them are recorded in writing on **MyConcern**, on the day they arise. Records include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, and a note of any action taken, decisions reached and the outcome. (*KCSIE 2026, para 72, p24.*)

19.2 Records are factual, contemporaneous, dated and timed, and distinguish fact from opinion and hearsay. Paper notes made at the time are scanned to MyConcern and the originals retained until the record is confirmed.

19.3 Staff never record safeguarding information in personal notebooks, email, messaging applications or shared drives, and never on a personal device.

Part D — Information sharing, records and confidentiality

20. Information sharing

20.1 Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting students' welfare, including their educational outcomes. Pledge2Learn has clear powers to share, hold and use information for these purposes.

Fears about sharing information must never stand in the way of the need to safeguard and promote the welfare of a child. (*KCSIE 2026, paras 138–146, pp38–40.*)

20.2 Staff are proactive in sharing information as early as possible. In deciding what to share, we consider the relevance of the information to the current safeguarding risk, what is necessary for the receiving setting to know, and whether it is clearly presented and appropriately contextualised. Professional judgement is used to keep sharing focused and proportionate; but care is taken not to omit information that may be relevant to understanding or managing risk. (*KCSIE 2026, paras 141–142, p39.*)

20.3 New statutory information sharing duty. The Children's Wellbeing and Schools Act 2026 introduces a duty on safeguarding organisations and practitioners to share information relevant to safeguarding or promoting the welfare of a child, together with a **consistent (unique) identifier** for children. KCSIE 2026 signposts this duty at para 142 and states that specific statutory guidance will follow. Pledge2Learn will implement the duty and the identifier on commencement, and will update this policy and train staff at that point.

20.4 Data protection laws — the Data Protection Act 2018, the UK GDPR and the **Data (Use and Access) Act 2025** — do not prevent the sharing of information for the purposes of keeping children safe. "Safeguarding of children and individuals at risk" is a processing condition permitting the sharing of special category personal data without consent where it is not possible to gain consent, where it cannot reasonably be expected that consent is gained, or where seeking consent would place a child at risk.

20.5 Where the serious harm test is met — for example where a student is in a refuge or emergency accommodation — personal data must be withheld. Where there is any doubt, independent advice is sought.

20.6 Staff who are in any doubt about sharing information speak to the DSL. The DSL applies the seven golden rules for information sharing in *Information sharing: advice for practitioners*.

21. Child protection files, transfer and retention

21.0 Who holds the file. For **registered students**, Pledge2Learn holds the child protection file, is responsible for its transfer when the student leaves, and retains the record until the student reaches 25. For **commissioned students**, the home school or placing authority holds the master file; we maintain our own record of concerns arising here on MyConcern, share them with the home school DSL the same day, and transfer our record to the home school when the placement ends. We do not retain a duplicate master file for a student who is not on our roll, other than the chronology and any documents we created.

21.1 A separate child protection file is maintained on MyConcern for every student about whom there is a safeguarding concern. It is stored securely and accessed only by those who need to see it. The DSL is responsible for its accuracy and completeness.

21.2 Transfer out. When a student leaves Pledge2Learn, including on an in-year transfer, the DSL ensures the child protection file is transferred to the receiving school or college **as soon as possible, and within five days for an in-year transfer or within the first five days of a new term**. It is transferred separately from the main student file, marked *Child Protection — Confidential — for the attention of the DSL*, sent by secure means, and confirmation of receipt obtained. (*KCSIE 2026, para 148, pp40–41.*)

21.3 In addition to the file, the DSL considers what information should be shared in advance of the student leaving, particularly where it would support an assessment of risk to others as well as to the student. **Where information indicates a risk to others or to the student — for example where a student has previously carried, threatened with, or used a knife or weapon — the receiving setting must assess risk and put in place a safety and support plan for when the student arrives.** Where there are concerns of any complexity, the DSL speaks to the receiving DSL directly. (*KCSIE 2026, paras 149–150, p41.*)

21.4 Transfer in. On admission or at the start of a placement, the DSL requests the child protection file from the previous school or the commissioning school before the student starts wherever possible, and chases within five days if it is not received. Admission is not delayed, but a risk assessment is completed on the information available and reviewed once the file arrives.

21.5 Record of transfer. A record of transfer is retained until the student reaches 25, containing: the student's name and date of birth; the name and address of the receiving setting; the date the file was transferred, with the name and role of the person who received it; the date confirmation of receipt was received; and a summary of the case at the point of transfer.

21.6 Retention. The setting the student attended until statutory school leaving age retains the student record until the student is 25. Where Pledge2Learn holds that responsibility,

we retain a copy of the student's chronology and any documents we created, such as risk assessments, in a secure archive until the student is 25. Archived files are stored as securely as active files. Retention is otherwise in line with our Data Retention Schedule.

22. Confidentiality and data protection

22.1 We preserve the privacy and dignity of students and families so far as is consistent with keeping students safe. The DSL determines which staff need to know personal information, and what they need to know, for the purpose of supporting and protecting the student.

22.2 Staff never promise confidentiality to a student.

22.3 The **Data Protection Lead is Sam Batty**. Personal data breaches must be reported immediately to DataProtection@pledge2learn.co.uk or by telephone on 01724 454377, and are handled under our Data Protection Policy.

22.4 Cyber security and information security. Protecting personal information and maintaining appropriate cyber security systems is part of our safeguarding responsibility, not a separate IT matter. We implement measures in line with the DfE *Cyber security standards for schools and colleges*, covering access management, multi-factor authentication for privileged accounts, backup, patching, and incident response. The Advisory Board receives an annual report on cyber security. (*KCSIE 2026, paras 176–178, pp47–48.*)

22.5 Accurate information. To keep students safe we require and maintain accurate, current information on: the names, contact details and relationship of anyone the student normally lives with; anyone with parental responsibility; **more than one emergency contact wherever reasonably possible** (*KCSIE 2026, para 124, p36*); anyone authorised to collect the student; any court order affecting access to the student; whether the student is or has been on a child protection plan, a child in need, or supported through Family Help; whether the student is in care or care experienced, and their legal status, contact arrangements and care arrangements; whether the student is a young carer; whether the student is privately fostered or in a kinship arrangement; whether the student lives in temporary accommodation; GP details; medical conditions and allergies; and any other factor affecting safety and welfare. This information is checked on admission and at least annually, and updated whenever we are told of a change.

Part E — Creating and maintaining a safe environment

23. Online safety

23.1 Online safety is a running and interrelated theme through all of our safeguarding arrangements, our curriculum, our staff training and our engagement with parents. The Online Safety Lead is **Callum Cutillo**, Deputy DSL.

23.2 Online risk is categorised in four areas (*KCSIE 2026, para 163, pp44–45*):

- **Content** — exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, **misinformation, disinformation and conspiracy theories**;
- **Contact** — harmful interaction with other users, or with generative AI applications that simulate this, including peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit;
- **Conduct** — online behaviour that increases the likelihood of, or causes, harm, including making, sending and receiving explicit images, including those generated using AI, and online bullying; and
- **Commerce** — online gambling, inappropriate advertising, phishing and financial scams.

23.3 Definitions. *Disinformation* is the deliberate creation and spread of false or misleading content. *Misinformation* is the unintentional spread of false or misleading content.

23.4 Through the curriculum, students are supported to: use the internet, social media and digital technologies safely, responsibly and respectfully; protect their personal information and manage their online presence; recognise, avoid and respond to online risks including cyberbullying, online abuse, coercion, exploitation, misinformation and inappropriate content; understand healthy relationships and appropriate online behaviour, including the prevalence of deepfakes, pornography and misogynistic influencers; and know how and where to seek help, including where they witness harm to others.

23.5 All students, parents, staff, volunteers and Advisory Board members sign an acceptable use agreement covering the internet, our IT systems, and mobile and smart technology.

23.6 We communicate with parents about what systems we use to filter and monitor online use, what students are asked to do online and which sites they are asked to access, and who from Pledge2Learn will interact with their child online.

23.7 We carry out an **annual review of our approach to online safety**, supported by an annual risk assessment reflecting the risks faced by our students. (*KCSIE 2026, para 179, p48.*)

23.8 Remote provision. Where any education is delivered remotely, staff follow our Remote Education and Online Safety procedures: sessions take place in an appropriate setting with appropriate dress; sessions are recorded only where there is a clear purpose and with consent; one-to-one remote sessions require prior approval from a senior leader and are logged.

24. Filtering and monitoring

24.1 We do all that we reasonably can to limit students' exposure to online risk from our IT systems, having regard to the number and age range of our students, those potentially at greater risk of harm, how often they access the system, and the proportionality of cost against safeguarding risk. *(KCSIE 2026, para 171, pp46–47.)*

24.2 The senior leader responsible for filtering and monitoring is **Sam Batty**, working with the DSL and our IT provider.

24.3 The effectiveness of filtering and monitoring is reviewed **at least once every academic year**. The review is carried out by the responsible senior leader with the support of the DSL and IT support, and **includes checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks is kept** and reported to the Advisory Board. *(KCSIE 2026, para 171.)*

24.4 We meet the DfE filtering and monitoring standards: roles and responsibilities are identified and assigned; provision is reviewed at least annually; harmful and inappropriate content is blocked without unreasonably impacting teaching and learning; and effective monitoring strategies are in place. We take care that over-blocking does not unreasonably restrict what students can be taught about online safety. *(KCSIE 2026, paras 161, 173, pp44, 47.)*

24.5 The appropriateness of our systems is informed in part by the risk assessment required under the Prevent duty.

24.6 All staff understand their role in filtering and monitoring, which may include monitoring what is on students' screens, and know how to report a concern where: unsuitable material has been or may have been accessed; they are able to access unsuitable material; they are teaching topics likely to create unusual activity in filtering logs; there is a failure in, or abuse of, the system; restrictions unreasonably affect teaching, learning or administration; or they notice abbreviations or misspellings that circumvent restrictions.

25. Mobile phones and smart technology

25.1 Pledge2Learn is a **mobile phone-free environment by default**. Statutory guidance is clear that schools should implement a policy whereby students do not have access to their mobile phone throughout the day, including during lessons, between lessons, at break and at lunchtime. Any exception must be individually justified, recorded and reviewed — for example a documented medical need. *(KCSIE 2026, para 168, pp45–46; DfE Mobile phones in schools.)*

25.2 We recognise that students have unrestricted access to the internet through mobile networks, and that mobile and smart technology is used to sexually harass, bully and control others, to share nudes consensually and non-consensually, often in large chat groups, and to view and share pornography and other harmful content. Our arrangements are designed accordingly and set out in the Mobile Phone and Electronic Device Policy.

25.3 Staff use. Staff may bring personal phones on site but limit use to non-contact time when students are not present. Staff do not take photographs or recordings of students on personal devices under any circumstances. Staff do not photograph a student's injuries or marks; injuries are recorded on a body map (**Annex 4**) unless a photograph is specifically requested, agreed and approved as part of an investigation by the police or children's social care.

25.4 Staff, students and parents are made aware that staff have the power to search a student's phone in accordance with DfE *Searching, screening and confiscation* guidance and Section 30 of this policy.

26. Artificial intelligence and synthetic media

26.1 Generative AI tools are widely available to students, staff and parents. AI can support teaching, learning and safeguarding, but can also be used to facilitate abuse — including bullying, grooming, harassment, exploitation, impersonation and image-based abuse — and can expose students to harmful content.

26.2 Synthetic media — AI-generated or AI-manipulated images, audio and video, commonly called deepfakes — is treated as a safeguarding matter. Any concern involving synthetic media is reported to the DSL, recorded on MyConcern, risk assessed and responded to under this policy. **Nude or semi-nude images that are digitally altered or wholly AI-generated are treated in exactly the same way as photographic images** and are dealt with under Section 47.

26.3 Where AI is used to create or share harmful content, or to bully or harass a student or member of staff, it is dealt with under this policy and the Behaviour Policy, and where a criminal offence may have been committed, referred to the police.

26.4 Staff carry out a risk assessment before any new AI tool is used with students, having regard to DfE guidance on generative AI in education, the DfE *Generative AI: product safety expectations*, and data protection requirements. AI tools are not used to process student personal data without prior approval from the Data Protection Officer.

27. Premises: toilets, changing and washing facilities

27.1 The requirements in this section derive from the School Premises (England) Regulations 2012 and the **Education (Independent School Standards) Regulations 2014**, and reflect our safeguarding obligations. They are requirements, not matters of discretion. (*KCSIE 2026, paras 105–116, pp32–34.*)

27.2 Toilets.

- We **must not** allow a student into a toilet designated for the opposite biological sex. This includes where we are responding to a request to support any degree of social transition for a student questioning their gender.

- We **must** provide separate toilets for boys and girls aged 8 and over, other than where individual toilets are in a room lockable from the inside and intended for use by one student at a time.
- Where a student questioning their gender does not want to use the toilet designated for their biological sex, we consider whether an alternative facility can be provided, such as a self-contained individual toilet, without compromising the provision of single-sex facilities. Any alternative must not compromise the safety, comfort, privacy or dignity of that student or of any other student.
- Where mixed-sex toilets are provided in addition to single-sex toilets, we assess the safeguarding risk and plan accordingly. Mixed-sex toilets must be individual, lockable rooms opening directly onto a public area such as a corridor.

27.3 Changing rooms and showers.

- We **must not** allow a student aged 11 or over at the start of the academic year to undress in front of a student of the opposite biological sex.
- Changing accommodation and showers must be suitable for the students they are provided for, having regard to their ages, numbers and sex and any special requirements.
- Where a student questioning their gender does not want to use the changing or washing facilities designated for their sex, we consider an alternative — a fully enclosed room for one student at a time that can be secured from the inside, or access at an alternative time — without compromising single-sex provision, safety, comfort, privacy or dignity.

27.4 Recording and review. Where an alternative arrangement is made under this section, the DSL records the situation, ensures it is communicated appropriately to those who need to know, and reviews it regularly. Records are held on MyConcern.

28. Students questioning their gender

28.1 We approach any issue relating to a student questioning their gender carefully and through a **safeguarding lens**, having regard to our overarching duty to safeguard and promote the welfare of **all** students, to the Equality Act 2010, to the Human Rights Act 1998, and to the premises requirements at Section 27. (*KCSIE 2026, paras 95–116.*)

28.2 Where a student confides in a member of staff that they are questioning their gender but does not ask us to make any change to how they are treated, there is no reason to break that confidence unless there is a related safeguarding risk. The member of staff should nonetheless speak to the DSL so that support and any safeguarding risk can be considered.

28.3 Where a student requests support with any degree of **social transition**, parents or carers should **nearly always** be involved, other than in the rare circumstances where involving them would constitute a greater risk to the student than not involving them. The DSL makes and records that judgement, taking advice from children's social care where appropriate.

28.4 In considering any request, we take a case-by-case approach and take into account all relevant factors, including whether supporting social transition is overall in the best interests of the student, the impact on other students, and the aim of creating a safe and fair environment. Decisions are recorded, communicated to those who need to know, and reviewed.

28.5 Sport. The Equality Act 2010 contains an exception permitting single-sex sport where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy, or vice versa. Where a sport is separated by biological sex on **safety** grounds, there must be no exceptions. Where separation is for reasons of fairness, and there is no safety concern, a request about participation is considered in the light of paragraph 28.4.

28.6 Staff receive training on this section. Where a scenario is complex, the DSL takes specialist advice before acting.

29. Behaviour, physical intervention and the use of reasonable force

29.1 This section is read with the Behaviour Policy and the DfE guidance *Behaviour in Schools* and *Use of reasonable force*. KCSIE 2026 contains a strengthened section on the use of reasonable force in schools. (*KCSIE 2026, Part two, p53.*)

29.2 Members of staff have a legal power to use reasonable force to prevent a student committing an offence, injuring themselves or others, damaging property, or prejudicing the maintenance of good order and discipline. Force is used only where it is **necessary, reasonable and proportionate**, only for the minimum time necessary, and only where no less intrusive option is available. It is never used as a punishment.

29.3 We recognise that many of our students have experienced trauma and that restrictive physical intervention can retraumatise. De-escalation is always the first response. The use of force is a last resort.

29.4 Students with SEND and medical conditions. Where a student has SEND, a medical condition or an EHC plan, we make reasonable adjustments and plan in advance. Any student for whom physical intervention is a foreseeable possibility has an individual positive handling plan, agreed with parents and the commissioning school, recorded and reviewed at least termly.

29.5 Staff who may be required to use physical intervention are trained in an accredited approach and refresh that training in line with the accrediting body's requirements. Untrained staff act only where there is an immediate risk to safety and no trained member of staff is available.

29.6 Recording. Every use of physical intervention is recorded on MyConcern on the same day, including what happened, who was involved, what de-escalation was attempted, the nature and duration of the intervention, any injury, and the student's account. Parents and the commissioning school are informed the same day. The DSL reviews every record for safeguarding implications and reports patterns to the Advisory Board termly.

29.7 We do not use seclusion. Where a student is separated from others for their own or others' safety, this is supervised, time-limited, recorded and reviewed. Any concern that force has been used inappropriately is dealt with under Section 42 as an allegation about an adult.

30. Searching, screening and confiscation

30.1 Searching, screening and confiscation are carried out in accordance with DfE *Searching, screening and confiscation* guidance and our Behaviour Policy. This section covers the safeguarding dimension only.

30.2 Any search is carried out by a member of staff authorised by the Head of School, with a second member of staff present as a witness wherever possible. Searches of a student's clothing beyond outer clothing, pockets, bags and possessions require the same sex as the student and a witness, other than in an emergency where there is a risk of serious harm.

30.3 Strip searching is a police power and is never carried out by staff. Where police attend to conduct a search of a student, the DSL must be informed immediately, an Appropriate Adult must be present, parents must be informed unless doing so would place the student at risk, and the DSL records the event on MyConcern and considers whether a safeguarding referral is required.

30.4 Where a search recovers a weapon, drugs, stolen property, or an image or device that may contain a nude or semi-nude image, the DSL is informed immediately and Sections 31 and 47 apply. Staff do not view, copy, print, share or delete a suspected nude image of a child.

30.5 Every search is recorded, including the grounds for it, and reviewed by the DSL for safeguarding implications and for any pattern of disproportionate application.

31. Serious violence and weapons

31.1 Serious violence is a continuing safeguarding concern. It may involve physical assault, or carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and can be associated with criminal exploitation. (*KCSIE 2026, paras 49–52, pp19–20.*)

31.2 Staff must report to the DSL **any** concern about a student carrying or using a weapon, or expressing an intent to do so.

31.3 On receiving such a concern the DSL will:

- assess the risk **to the individual student and to others** in the setting, taking account of wider information and concerns;
- take immediate action to secure safety, including calling the police where there is an immediate risk;
- put in place a **safety and support plan** for the student, shared with the commissioning school and parents;
- consider action to de-escalate peer conflict; and

- consider a referral to children's social care, the police, and to targeted support such as mentoring or therapeutic intervention.

31.4 We are alert to the fact that risk is higher for students with disrupted education — suspensions, permanent exclusions, time in alternative provision — or a history of offending, which describes a substantial part of our cohort. We are also alert to when students may be at highest risk around the day, particularly immediately after the session ends.

31.5 Early, evidence-based support is central to prevention: access to trusted adults, social and emotional skills support, and targeted interventions such as mentoring or therapeutic support. We use the Youth Endowment Fund evidence base in choosing interventions.

31.6 Where a student joins us and information indicates they have previously carried, threatened with or used a knife or weapon, we assess the risk and put a safety and support plan in place **before or on the day the student arrives**. Where a student leaves us and such information exists, the DSL shares it with the receiving setting in advance. (*KCSIE 2026, paras 149–150, p41.*)

32. Attendance, children missing education and children not in school

32.1 Absence from education is one of the strongest indicators that a student may be at risk. Unexplainable or persistent absence is a safeguarding issue, not only an attendance issue. (*KCSIE 2026, para 29, p14; para 121, p35; Working together to improve school attendance.*)

32.2 We operate a **first-day, same-morning contact** procedure. Where a student does not arrive and we have not been notified, we contact parents or carers, and then each emergency contact in turn. Where contact cannot be made, or where the explanation gives rise to concern, the DSL is informed the same day.

32.3 Registered students. Pledge2Learn keeps an admission register and an attendance register for every student on our roll, in accordance with the Education (Pupil Registration) (England) Regulations 2006 and the Independent School Standards. We follow the national attendance codes, monitor absence daily, and take the actions at 32.4 ourselves. We notify the local authority when a student is added to the admission register at a non-standard transition point, and **before** a student is deleted from it, giving the grounds. Where a student of compulsory school age on our roll cannot be located, we make a **children missing education** referral to the local authority.

32.3A Commissioned students. For part-time, dual-registered students we notify the **home school and, where the placement was arranged by the authority, the local authority on the same day** of any absence from a session, using the agreed attendance code, and we do not assume that another party is following it up. Responsibility for statutory attendance action rests with the home school, but we escalate in writing where we are not satisfied that action is being taken.

32.4 Where a student is absent without explanation, the DSL considers a home visit by two members of staff, contact with other agencies involved, and, where a student cannot be

located, a referral to the local authority as a **child missing education** and to the police where there is concern for immediate safety. We do not wait for a fixed number of days where there is a safeguarding concern.

32.5 Patterns of absence, lateness, part-time timetables and repeated removal from sessions are reviewed by the DSL at least fortnightly for safeguarding significance, and reported to the Advisory Board termly.

32.6 Off-rolling. We never remove a student from roll, or encourage a parent to remove a student, other than through a lawful process agreed with the commissioning school and the local authority. Any proposal to cease a placement is discussed with the commissioning school and the local authority in advance and recorded.

32.7 Elective home education. Where a parent expresses an intention to educate a student at home, the DSL informs the commissioning school and the local authority immediately, and ensures a co-ordinated conversation takes place with the family covering the student's safety and welfare as well as their education. Where a student is subject to a child protection plan or s47 enquiries, the DSL escalates to children's social care before any change is made, and notes the restrictions introduced by the Children's Wellbeing and Schools Act 2026.

32.8 Children not in school registers. The Children's Wellbeing and Schools Act 2026 introduces local authority registers of children not in school and associated duties. We will provide information to the local authority as required and will update this section once the registers and duties are commenced.

33. Site security, shared premises, visitors and contractors

33.1 Our Site Security Policy sets out signing-in procedures, identification, escorting, risk assessments and expected conduct. Visitors do not have unsupervised access to students.

33.2 Shared premises. Pledge2Learn operates from premises shared with Bottesford Town Football Club. The Proprietor Body ensures that safeguarding requirements are included in any agreement transferring control of the premises — a lease or hire agreement — as a condition of use and occupation, and that failure to comply would lead to termination of the agreement. (*KCSIE 2026, "Use of school or college premises for non-school/college activities", p54.*)

33.3 Where an individual or organisation uses the premises to run activities for children outside our provision, we expect them to have safeguarding arrangements in line with DfE guidance on keeping children safe in out-of-school settings, and we require evidence of this. If we receive an allegation relating to an incident during such use, we follow this policy and our critical incident plan, and inform the LADO where appropriate.

33.4 Contractors working on site during operational hours are supervised, do not have unsupervised access to students, and are subject to the checks set out at Section 40. Where work cannot be separated from students, it is scheduled outside operational hours.

33.5 Emergency planning and Martyn's Law. The Terrorism (Protection of Premises) Act 2025 received Royal Assent on 3 April 2025. We maintain, review and practise an emergency and critical incident plan including evacuation, invacuation and lockdown, informed by DfE emergency planning guidance, the Prevent duty risk assessment, and Martyn's Law preparedness requirements. Plans are reviewed annually and after any incident.

34. Transport and non-collection

34.1 Most of our students travel by transport commissioned by the local authority, the commissioning school or the Virtual School, usually by taxi. This is a daily period of contact with adults outside our direct supervision and is treated as a safeguarding risk to be actively managed.

34.2 We seek written assurance from the commissioner that drivers and passenger assistants hold an enhanced DBS check with barred list information, are licensed, and have received safeguarding training. Where assurance is not provided, the DSL escalates to the commissioner in writing and records the risk.

34.3 Students are supervised from the point at which they are handed over to us until the point they are handed back. Drivers do not enter teaching areas.

34.4 Non-collection. If a student is not collected at the end of the session, we will:

- ensure the student is never left alone, and remains supervised by two members of staff where possible;
- contact the transport provider and the commissioner;
- inform parents or carers and the commissioning school, and keep them updated;
- on arrival, check that the driver can confirm the name of the student they are collecting and the address they are taking them to, and that this matches our record; and
- record the incident on MyConcern and report it to the commissioning school, the parent or carer, and where relevant to the SEND team, the Education Inclusion Service and the student's social worker.

34.5 Where a student cannot be safely returned home and no responsible adult can be contacted, the DSL contacts children's social care and, where there is immediate concern for safety, the police. Staff never transport a student in their own vehicle other than in an emergency approved by the Head of School and recorded.

35. Health, medical conditions and allergies

35.1 We support students with medical conditions in line with our Supporting Students with Medical Conditions Policy and individual healthcare plans. Allergy management, including the availability and administration of adrenaline auto-injectors, follows that policy and the requirements introduced by the Children's Wellbeing and Schools Act 2026 in relation to allergy safety in schools.

35.2 Safeguarding threshold. An incident relating to the management of a student's medical condition, including an allergy, **does not of itself warrant a referral to the safeguarding partners.** A safeguarding referral is required where the incident gives rise to concern that, because of their medical condition, the student may be at increased risk of neglect, abuse or exploitation, whether within or outside their family — for example where medication is repeatedly not provided, where a condition is not being managed at home, or where a condition is being fabricated or induced.

35.3 Every medical incident is nonetheless recorded, reviewed by the DSL for safeguarding significance, and reported to parents and the commissioning school.

35.4 Fabricated or induced illness. All staff should be aware that, although rare, a parent or carer may fabricate or induce illness in a child. This may present as medically unexplained symptoms, perplexing presentations or fabricated or induced illness. Any such concern is reported to the DSL, who follows the MARS protocol.

35.5 Intimate care and personal care. Where a student requires intimate or personal care, this is set out in an individual plan agreed with parents, delivered by named, trained staff, with two adults present wherever practicable, and recorded each time. Intimate care is never delivered by a member of staff who has not been checked as being in regulated activity.

35.6 First aid and emergencies. Where a student is in immediate danger, staff call 999 or arrange for the student to be taken to A&E immediately by a parent, carer or other suitable person. Where a student needs urgent help for their mental health but it is not an emergency, staff can use NHS 111 online or call 111 and select the mental health option. *(KCSIE 2026, para 48, p19.)*

36. Off-site activities, work experience and post-16

36.1 All off-site activity is risk assessed and approved in advance by the Head of School, with staffing ratios, emergency arrangements and communication routes recorded.

36.2 Work experience and placements. Where a student undertakes work experience or a vocational placement, we carry out proportionate checks on the host, including a written safeguarding statement, confirmation of insurance, a named contact, and confirmation of what supervision the student will receive and by whom. Where a student will be in one-to-one contact with an individual, we seek confirmation of appropriate DBS checks. Students are briefed on how to raise a concern while on placement, and are contacted during it.

36.3 Students aged 16 and 17. Students aged 16 or 17 remain children for the purposes of this policy. We are alert to the fact that 16- and 17-year-olds who can legally consent to sex can still be victims of child sexual exploitation, and that a student may not recognise an exploitative relationship as abusive. *(KCSIE 2026, para 42, pp17–18.)*

37. Working with commissioning schools and local authorities

37.1 This section applies to **commissioned students** — those attending part time who remain on the roll of a mainstream school or are placed by the local authority. KCSIE 2026 is clear that where a school commissions alternative provision it **retains safeguarding responsibility** for the student and must continue to carry out safeguarding checks and its own due diligence to ensure the provision is appropriate to meet each child's individual needs. (*KCSIE 2026, "Alternative Provision", p55.*) We support commissioners to discharge that duty and we expect to be scrutinised. Section 39 sets out the additional duties we owe to students on our own roll.

37.2 For every placement, before the student starts, we agree in writing with the commissioner:

- who the student's DSL of record is, and the named safeguarding contact at both settings;
- the safeguarding information to be shared with us, including the child protection file, risk assessments, any safety and support plan, EHC plan, medical and allergy information, and any court order or contact restriction;
- attendance reporting arrangements, including same-day notification of absence;
- incident and injury notification arrangements;
- arrangements for transport and handover;
- how the placement will be reviewed, and by whom; and
- how a concern about our provision may be raised, and by whom.

37.3 We provide commissioners, on request and at least annually, with: this policy; confirmation of our safer recruitment arrangements and Single Central Record compliance; our safeguarding training record; our insurance; our complaints procedure; and our most recent inspection outcome.

37.4 We report to the commissioning school, on the same day: any safeguarding referral made in respect of their student; any allegation involving their student; any serious incident, injury or use of physical intervention; any unexplained absence; and any exclusion or cessation of placement.

37.5 Where we have a concern about the safeguarding practice of a commissioning school or another provider, the DSL raises it with that setting's DSL, and escalates to the local authority and the LADO where the concern relates to professional practice. We follow the MARS escalation and resolution procedure where a disagreement is unresolved.

37.6 Where we ourselves place or refer a student to a further provider or activity, we carry out our own safeguarding checks and due diligence on that provider, and retain responsibility for the student.

Part F — Safe staffing

38. Registered students: our duties as the school

38.1 This section applies to **registered students** — those admitted full time onto the Pledge2Learn admission register. For these students there is no commissioning school standing behind us. Pledge2Learn is the school, and every duty that KCSIE 2026 and the Independent School Standards place on a school falls on us alone.

38.2 For every registered student the DSL ensures that:

- the child protection file is requested from the previous school before admission, chased within five days if not received, and reviewed before the student starts wherever possible;
- an admission and attendance register entry is created, and the local authority is notified where the student joins at a non-standard transition point;
- the local authority is notified **before** the student is deleted from the admission register, with the grounds recorded;
- we hold and maintain the master child protection file, and transfer it within five days on leaving, retaining the record until the student is 25 (Section 21);
- more than one emergency contact is held wherever reasonably possible;
- where the student has an Education, Health and Care plan, we contribute to the annual review and work with the placing authority, and where the student is a child in care or care experienced, with the Virtual School Head and the allocated social worker; and
- there is a named member of staff responsible for the student's pastoral oversight and known to them.

38.3 No commissioner backstop. Where a concern arises about a registered student, the DSL cannot rely on a home school to act, and does not delay a referral while seeking another party's view. Referrals are made directly to the North Lincolnshire Single Point of Contact on 01724 296500, or to the placing authority where the student resides elsewhere.

38.4 Complaints and escalation. Parents and carers of registered students raise concerns under the Feedback and Complaints Policy (Section 51). They may also contact the LADO, the local authority, Ofsted or the Department for Education at any time. This is made clear to parents at admission.

38.5 Students attending both full time and part time. Where a student's pattern of attendance changes — for example where a commissioned part-time student moves onto our roll full time, or a registered student moves to a part-time or shared arrangement — the DSL records the change, confirms in writing with the other setting and the local authority who holds safeguarding responsibility and the child protection file from that date, and updates MyConcern. **Responsibility is never left ambiguous during a transition.**

38.6 Registration scope. The Head of School monitors the number of registered students, their age range and the premises in use against our entry on the register of independent

schools, and reports to the Proprietor Body termly so that any material change is applied for before it is made (Section 7).

39. Safer recruitment and the Single Central Record

39.1 We follow Part three of KCSIE 2026 and Part 4 of the Education (Independent School Standards) Regulations 2014. Full detail is in the Safer Recruitment Policy; this section states the safeguarding requirements that must be met.

39.2 Every recruitment exercise includes: a job description and person specification referencing safeguarding; a safeguarding statement in the advertisement; an application form — **a curriculum vitae is never accepted in place of an application form**; scrutiny of the application, including exploration of gaps in employment history; notification to shortlisted candidates that **online searches may be carried out as part of due diligence**; a face-to-face interview exploring suitability to work with children; at least one panel member trained in safer recruitment; references sought directly from the employer on all shortlisted candidates before interview wherever possible, and never accepted as open testimonials or provided by a relative; and verification of identity, right to work, and academic and vocational qualifications.

39.3 Pre-appointment checks are completed and recorded before a person begins work: identity; right to work in the UK; enhanced DBS certificate with barred list information where the person will be in regulated activity; a prohibition from teaching check for anyone carrying out teaching work; a prohibition from management (**s128**) check for anyone in a management position; a check of professional qualifications where required; overseas checks where a person has lived or worked outside the UK; and confirmation of health and physical capacity for the role.

39.4 The Single Central Record. We maintain a single central record for all staff, including trainees, agency and third-party supply staff, and volunteers, and for the proprietor. For an independent school the record must also evidence checks on the **proprietor** and, where the proprietor is a body of persons, on the **chair** of that body, as required by the Independent School Standards. The DSL and Head of School check the record monthly; the named Advisory Board member checks it termly and the check is minuted.

39.5 Agency and supply staff. Written confirmation is obtained from the agency that all required checks have been completed and that the person is suitable; identity is verified on arrival at the setting on each occasion; and agency staff receive a safeguarding induction before working with students.

39.6 Fit and proper persons. Anyone participating in the management of Pledge2Learn must satisfy the **fit and proper person** test under the Children's Wellbeing and Schools Act 2026. The Proprietor Body notes that an individual may satisfy all formal checks and still not meet this standard, and takes this into account in appointments to the Proprietor Body and Advisory Board and in senior appointments.

40. Regulated activity, volunteers and contractors

40.1 The Crime and Policing Act 2026 **removes the supervision exemption** from the definition of regulated activity. From 1 September 2026, some individuals who work or volunteer with children on a supervised basis — previously outside regulated activity — now fall within it and are therefore eligible for, and require, an enhanced DBS check with barred list information. (*KCSIE 2026, Annex C, p195.*)

40.2 The Head of School and the DSL will undertake a reassessment of the SCR against the revised definitions, and will repeat that assessment for every new role. The assessment and its outcome are recorded and held with the Single Central Record.

40.3 No volunteer works unsupervised with students, or in regulated activity, until the required checks are complete. Supervised volunteers who do not require a barred list check nevertheless undergo identity and reference checks and a safeguarding induction, and a written risk assessment records why the check level is appropriate.

40.4 Where a person will work or volunteer with children for **more than three days in a 30-day period, or any overnight stay**, they are eligible for the highest level of check and we obtain it.

41. Staff behaviour, code of conduct and position of trust

41.1 All staff, volunteers and contractors are bound by the Staff Code of Conduct, which covers professional boundaries, acceptable use of technology and mobile devices, staff–student relationships, communication including social media, gifts, transport, physical contact, one-to-one working, dress, and conduct outside work that may affect suitability. It also covers low-level concerns, allegations and whistleblowing. (*KCSIE 2026, para 121, p35.*)

41.2 Position of trust. It is an offence under s16 of the Sexual Offences Act 2003 for a person aged 18 or over in a position of trust to engage in sexual activity with a child under 18, **even where the relationship is consensual and even where the child is over the age of consent**. All staff are in a position of trust in relation to every student at Pledge2Learn. (*KCSIE 2026, para 121 fn28, p35.*)

41.3 Transferable risk. Adults who present a risk to children in their personal lives may also present a risk in the setting. Where information comes to light about a member of staff's conduct, relationships or activities outside work — including allegations of domestic abuse, violence, sexual offences, substance misuse or exploitation — that raises a question about their suitability to work with children, it is assessed on a case-by-case basis, taking account of the nature of the information, the potential impact on students, and statutory guidance. Advice is taken from the LADO. The welfare of students remains the paramount consideration.

41.4 All staff and volunteers work in a way that is transparent and observable. One-to-one work takes place in a room with visibility, with the door open or in a known and agreed location, and is logged.

42. Concerns and allegations about staff that may meet the harm threshold

42.1 We have processes to manage **any** safeguarding concern or allegation, **no matter how small**, about a member of staff, supply staff, trainee, volunteer or contractor. (*KCSIE 2026, para 75, p25; Part four, Section one, pp104–117.*)

42.2 Reporting routes.

- A concern or allegation about a member of staff, supply staff, trainee, volunteer or contractor is reported to the **Head of School, Holly Dickinson**, who will consider whether an onward referral to the LADO is required.
- A concern or allegation about the **Head of School** is reported to the **Chair of the Proprietor Body, Patrick Lappin**.
- Where there is a conflict of interest — including any concern involving the proprietor or a member of the proprietor's family — the matter is reported and discussed directly to the LADO. (*KCSIE 2026, para 76 and para 125 fn30.*)

42.3 The harm threshold is met where it is alleged that a person has: behaved in a way that has harmed, or may have harmed, a child; possibly committed a criminal offence against, or related to, a child; behaved towards a child in a way that indicates they may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

42.4 Referral to the **LADO is made within one working day**. No internal investigation is carried out before that discussion. The person against whom an allegation is made is not informed until the LADO, police or children's social care have advised on the sequence, so as not to prejudice any inquiry.

42.5 Allegations are dealt with quickly, fairly and consistently, providing effective protection for the student and support for the adult. The adult is given a named contact who is not the investigating officer, is kept informed of progress, and is signposted to support. Suspension is never automatic and is considered only where there is no reasonable alternative; the reasons are recorded.

42.6 Every allegation is recorded, including allegations that are found to be unsubstantiated, malicious, false or unfounded, and the outcome and rationale are recorded on the person's personnel file. Where an allegation is found to be malicious it is removed from the personnel file.

42.7 Where a person is dismissed, or would have been dismissed had they not resigned, because they harmed or posed a risk of harm to a child, a **referral to the Disclosure and Barring Service is a legal duty** under s35 of the Safeguarding Vulnerable Groups Act 2006. Where the person is a teacher, a referral is also made to the **Teaching Regulation Agency**. **A settlement or non-disclosure agreement is never used to avoid a referral, and cannot lawfully do so.**

42.8 Failure to comply with the mandatory reporting duty for child sexual abuse at Section 16 is expressly a behaviour that may lead to inclusion in the children's barred list, and will be referred.

43. Low-level concerns

43.1 A low-level concern is any concern, however small, and even if no more than a nagging doubt, that an adult working in or on behalf of Pledge2Learn may have acted in a way that is inconsistent with the Staff Behaviour Policy, including inappropriate conduct outside of work, and that does not meet the harm threshold. **"Low-level" does not mean insignificant.** (*KCSIE 2026, Part four, Section two, pp118–122.*)

43.2 Low-level concerns are shared with the **Head of School** — or, where the concern is about the Head of School, with the **Chair of the Proprietor Body** — as soon as reasonably practicable, and always in writing. Staff are encouraged to share concerns about their own conduct as well as that of others.

43.3 We create a culture of openness, trust and transparency in which sharing low-level concerns is expected and supported, not penalised. Staff will never be criticised for sharing a concern in good faith.

43.4 Low-level concerns are recorded in a central record separate from personnel files, with the name of the individual, the concern, the context, the action taken and the rationale. The record is reviewed by the Head of School at least termly to identify any pattern. Where a pattern emerges, or where a concern on review meets the harm threshold, it is referred to the LADO.

43.5 Records of low-level concerns are retained at least until the individual leaves. Substantiated concerns may be referred to in a reference where relevant to suitability. Records are not routinely disclosed in references where the concern was unsubstantiated or related to conduct that has been addressed and not repeated, unless there is a safeguarding reason to do so.

44. Whistleblowing and escalation

44.1 All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in our safeguarding provision, and know these will be taken seriously by the senior leadership team. (*KCSIE 2026, paras 78–80, p25.*)

44.2 Internal routes are: the DSL; the Head of School; the Chair of the Advisory Board; the Chair of the Proprietor Body. Our Whistleblowing Policy applies and protects those who raise concerns.

44.3 Where a member of staff feels unable to raise an issue internally, or feels a genuine concern is not being addressed, external routes are open:

- the **NSPCC Whistleblowing Advice Line, 0800 028 0285**, open **08:00–20:00 Monday to Friday and 09:00–18:00 at weekends**, email **help@nspcc.org.uk**;
- the **LADO** for North Lincolnshire;

- **North Lincolnshire Single Point of Contact, 01724 296500;**
- Ofsted and the Department for Education; and
- the police.

44.4 Where a member of staff considers a concern is not being taken seriously, they may and should make a referral to children’s social care themselves. No member of staff will be disadvantaged for doing so.

44.5 Where we disagree with a decision by another agency and concerns remain, the DSL follows the MARS professional resolution and escalation procedure.

Part G — Child-on-child abuse and harmful sexual behaviour

45. Child-on-child abuse

45.1 All staff are aware that children can abuse other children, that it can happen inside and outside the setting and online, and that it is a safeguarding issue for **both** the student who has been harmed and the student who has caused harm. Even where there are no reports, it does not mean it is not happening; it may be that it is not being reported. *(KCSIE 2026, paras 30–35, pp15–16.)*

45.2 Child-on-child abuse is most likely to include, but is not limited to:

- bullying, including cyberbullying and prejudice-based and discriminatory bullying;
- abuse in intimate personal relationships between children, sometimes called teenage relationship abuse;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, which may include an online element that facilitates, threatens or encourages it;
- **serious physical assault and harm, or the threat of harm with a weapon;**
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, whether standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent;
- consensual and non-consensual making or sharing of nudes and semi-nudes;
- upskirting; and
- initiation or hazing type violence and rituals.

45.3 Staff challenge inappropriate behaviour between students that is abusive in nature and never downplay it. Dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment and, at worst, a culture that normalises abuse.

45.4 Child-on-child abuse is **preventable**. Staff recognise behaviours and indicators of risk early, and know that timely, evidence-based support can prevent students from going on to commit abuse or violence.

45.5 Any concern about child-on-child abuse, whether the events are thought to have taken place on or off site, is reported to the DSL. The DSL will: consider the needs of the student who has been harmed and the student who has caused harm separately; risk assess and put in place safety and support plans for both; consider referrals to children's social care and the police; consider whether other students are affected; and record all decisions on MyConcern. We are alert to when students may be at highest risk around the day, particularly immediately after the session ends.

45.6 Our preventative education is delivered through a planned, evidence-based programme in timetabled sessions and reinforced across the curriculum, creating a culture of zero tolerance for sexism, racism, misogyny, misandry, homophobia, biphobia, sexual violence, sexual harassment, derogatory behaviour and other forms of violence and conflict. It covers healthy and respectful relationships; boundaries, consent and kindness; stereotyping, prejudice and equality; body confidence and self-esteem; recognising and reporting an abusive relationship, including coercive and controlling behaviour; the law relating to all forms of sexual harassment and abuse; and online harms including image sharing, deepfakes, pornography and misogynistic influencers. (*KCSIE 2026, para 158, pp42–43.*)

46. Sexual violence and sexual harassment

46.1 Part five of KCSIE 2026 was substantially reworked for 2026 and is organised around understanding **harmful sexual behaviour on a continuum**, and supporting evidence-based safeguarding decisions. The DSL has read Part five in full and applies it to every report. (*KCSIE 2026, Part five, pp123–154.*)

46.2 We take all reports seriously. We never dismiss or downplay a report, never make a student feel they are creating a problem, and never make a student feel ashamed for reporting.

46.3 On receiving a report the DSL will make an immediate risk and needs assessment covering the student who has been harmed, the student who is alleged to have caused harm, and other students; will consider the wishes and feelings of the student who has been harmed; will consider whether a referral to children's social care and the police is required; and will record the assessment and keep it under review.

46.4 Consideration is given at once to: separating students where necessary; supervision arrangements; timetable, session and transport arrangements; support for both students; and communication with parents and the commissioning school.

46.5 Where a report involves a possible criminal offence, the DSL contacts the police, having regard to *When to call the police: guidance for schools and colleges*. Staff do not investigate.

46.6 Support for a student who has been harmed continues regardless of whether a criminal or social care process proceeds, and regardless of the outcome.

47. Nudes and semi-nudes

47.1 “Making or sharing nudes and semi-nudes” refers to the creation, sending or posting of nude or semi-nude images by young people under 18. “Images” includes photographs, videos and livestreams. Images may be taken by the student themselves, taken or created by another person, or **digitally altered or wholly generated using artificial intelligence, including what are described as “deepfakes” or “deep nudes”**. We use the term “nudes”; we do not use “sexting”. (*KCSIE 2026, “Nudes and semi-nudes, including where generated by AI”, p6.*)

47.2 Consensual image sharing, particularly between older children of the same age, may require a different response and may not be abusive — but students must still be told it is illegal. Non-consensual sharing is both illegal and abusive. (*KCSIE 2026, para 29 fn7, p14.*)

47.3 Where an incident comes to light, staff must: report to the DSL immediately; **not** view, copy, print, share, store or delete the image; **not** ask the student to show them the image; and confiscate and secure the device, switched off, until the DSL advises.

47.4 The DSL follows UKCIS *Sharing nudes and semi-nudes: advice for education settings*, carries out an initial review, holds a meeting with relevant staff, speaks to the students involved, informs parents unless doing so would put a student at risk, and decides whether to refer to police or children’s social care. All decisions and the rationale are recorded on MyConcern.

47.5 AI-generated or altered nude images of a student are treated identically to photographic images, including where the image is of a member of staff.

Part H — Mental health, Prevent and wider duties

48. Mental health, self-harm and suicidal ideation

48.1 Mental health problems can, in some cases, be a safeguarding concern, and may indicate that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals diagnose mental health conditions; staff do not. (*KCSIE 2026, paras 45–48, pp18–19.*)

48.2 Staff are well placed to notice potential warning signs, which may include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, no longer wanting to do things they usually enjoy, and physical signs of self-harm or self-neglect. Not every student showing these signs has a mental health concern, but staff always report them to the DSL.

48.3 Where a concern about a student's mental health is also a safeguarding concern, staff follow this policy and speak to the DSL. Where a student is in danger, staff call 999 or arrange for the student to be taken to A&E immediately by a parent, carer or other suitable person. Where urgent help is needed but it is not an emergency, staff use NHS 111 online or call 111 and select the mental health option.

48.4 The DSL liaises with the senior mental health lead and, where available, the Mental Health Support Team, and ensures any intervention we offer is evidenced as safe, effective and appropriate to the need and phase of education.

48.5 Where a student discloses suicidal ideation or self-harm, staff listen without judgement, do not promise confidentiality, do not leave the student alone, and inform the DSL immediately. A risk management and safety plan is put in place with the student, parents and, where involved, health services.

49. Radicalisation and the Prevent duty

49.1 Under s26 of the Counter-Terrorism and Security Act 2015 we have due regard to the need to prevent people from being drawn into terrorism.

49.2 We maintain a **Prevent risk assessment**, reviewed at least annually and after any relevant incident or change to our provision, covering the risk of students being drawn into terrorism, our external speakers and providers, our IT filtering, our shared premises, and staff awareness. The DSL owns the assessment; the Advisory Board reviews it.

49.3 All staff complete Prevent awareness training and know how to raise a concern. Concerns are reported to the DSL, who makes a Prevent referral to the local authority Prevent lead or the police where appropriate, and supports any subsequent **Channel** process. Referral to Channel is voluntary for the student and their family and is a support process, not a criminal one.

49.4 We promote resilience through the curriculum, including critical thinking about online content, misinformation, disinformation and conspiracy theories, and through creating opportunities for open discussion.

50. Specific safeguarding issues

50.1 All staff have an awareness of the specific safeguarding issues set out at **Annex 2**, including: child criminal exploitation and child sexual exploitation; county lines; serious violence; domestic abuse; extra-familial harm and contextual safeguarding; modern slavery, trafficking and the National Referral Mechanism; so-called honour-based abuse, including female genital mutilation, forced marriage and breast ironing; child abuse linked to faith or belief; harmful sexual behaviour; cybercrime; homelessness; private fostering and kinship care; young carers; children in care and care experienced students; children with family members in prison; children missing from home, care or education; and children and the court system.

50.2 Staff read Annex A of KCSIE 2026 (*Further information*, p155), which contains the full statutory detail on these issues. Annex 2 of this policy is a working summary and does not replace it.

50.3 Domestic abuse notifications. We receive notifications under Operation Encompass where police have attended a domestic abuse incident at a student's home, and, under arrangements introduced for 2026, notifications relating to students living in **temporary accommodation**. Notifications are received by the DSL, recorded on MyConcern, considered as part of the wider safeguarding picture, and used to inform support, monitoring and information sharing. Staff are informed on a need-to-know basis so the student can be supported discreetly on the day.

Part I — Assurance and related documents

51. Complaints and concerns about our provision

51.1 Concerns and complaints about Pledge2Learn, including about our handling of a safeguarding matter, are dealt with under the Feedback and Complaints Policy. The Feedback and Complaints Co-ordinator is **Sam Batty**, sam@pledge2learn.co.uk, 01724 454377.

51.2 A complaint never delays or displaces a safeguarding response. Where a complaint discloses a safeguarding concern, it is passed to the DSL immediately and dealt with under this policy in parallel.

51.3 A complainant who is dissatisfied with the outcome may escalate as set out in the Feedback and Complaints Policy, and may in any event contact the LADO, the local authority, Ofsted or the Department for Education about a safeguarding matter at any time.

52. Publication, approval and review

53.1 This policy is approved by the Proprietor Body before publication, is published on the Pledge2Learn website, and is available in hard copy on request. Annexes 1, 4, 5 and 6 are operational documents held internally.

53.2 This policy is reviewed at least annually, and immediately following any change in legislation or statutory guidance, any serious incident, any local child safeguarding practice review with implications for our practice, or any material change to our provision.

53.3 All staff sign to confirm they have read and understood this policy and Part one of Keeping Children Safe in Education 2026. The record of signatures is held by the Head of School.

Annex 1 — Key contacts

Role or service	Contact
Designated Safeguarding Lead — Emma Gill	Via Pledge2Learn, 01724 454377
Deputy DSL and Online Safety Lead — Callum Cutillo	Via Pledge2Learn, 01724 454377
Head of School — Holly Dickinson	holly@pledge2learn.co.uk
Chair of the Proprietor Body — Patrick Lappin	Via Pledge2Learn
Chair of the Advisory Board — Richard Giles	richard@pledge2learn.co.uk
Advisory Board safeguarding member — Ellen Chant	ellen@pledge2learn.co.uk
Feedback and Complaints Co-ordinator / Data Protection Officer — Sam Batty	sam@pledge2learn.co.uk
Pledge2Learn main number	01724 454377
North Lincolnshire Single Point of Contact (referrals)	01724 296500
Local Authority Designated Officer (LADO) — North Lincolnshire	Via North Lincolnshire Council / CMARS
Emergency services	999
Police non-emergency	101
NSPCC Whistleblowing Advice Line	0800 028 0285 (08:00–20:00 Mon–Fri; 09:00–18:00 weekends); help@nspcc.org.uk
NSPCC Helpline	0808 800 5000
Childline	0800 1111
NHS urgent mental health support	111, select the mental health option
Anti-Terrorist Hotline	0800 789 321
Report terrorism or extremism online	gov.uk/report-terrorism

Annex 1 is reviewed each term by the DSL and is displayed in the staff room and on MyConcern.

Annex 2 — Specific safeguarding issues

This annex is a working summary for staff. The full statutory detail is at **Annex A of KCSIE 2026 (p155 onwards)**, which leaders and staff who work directly with students must read.

Child criminal exploitation (CCE) and child sexual exploitation (CSE). Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity, often in exchange for something the child needs or wants, or for the perpetrator's advantage, or through violence or the threat of violence. It is **never possible for a child to consent to being exploited, abused or trafficked**, and children may not recognise it is happening to them. Where a potential victim is identified, a child protection referral and a modern slavery referral are completed. The experience of girls who are criminally exploited can differ markedly from that of boys, and indicators may not be the same.

County lines. Gangs and organised networks exporting drugs using dedicated mobile "deal lines". Indicators include unexplained money, phones or goods; going missing; travel to unfamiliar areas; relationships with controlling or older individuals; carrying weapons; and signs of assault or self-neglect.

Serious violence and weapons. See Section 31.

Domestic abuse. A single incident or pattern of behaviour that may be psychological, physical, sexual, financial or emotional. Children can be victims: they may see, hear or experience the effects of abuse at home, and may suffer abuse in their own intimate relationships. See also Section 50.3.

Extra-familial harm and contextual safeguarding. Harm occurring outside the family, including in peer groups, schools, neighbourhoods and online. Referrals must include as much context as possible so that assessments can address the context, not only the individual.

Modern slavery and the National Referral Mechanism. The NRM is the framework for identifying and referring potential victims of modern slavery. Referrals are made by the DSL as a First Responder route via the local authority or police.

So-called honour-based abuse, FGM, forced marriage and breast ironing. All are forms of abuse. Staff must never approach the family or community. FGM carries a **personal reporting duty on teachers** — see Section 16.1. Forced marriage is distinct from arranged marriage and is a criminal offence; the Forced Marriage Unit can advise.

Child abuse linked to faith or belief. Including abuse arising from a belief in spirit possession or witchcraft. Any concern is reported to the DSL immediately.

Harmful sexual behaviour. Understood on a continuum, from developmentally expected through inappropriate, problematic, abusive and violent. Assessment considers the age and development of the children involved, any imbalance of power, coercion, and whether the behaviour is persistent. See Section 46.

Cybercrime. Including unauthorised access to computer material, and the making, supplying or obtaining of tools to commit computer misuse offences. Students with high technical ability may be drawn in; the Cyber Choices programme offers diversion.

Homelessness and temporary accommodation. Indicators include household debt, rent arrears, domestic abuse and anti-social behaviour. 16- and 17-year-olds who present as homeless may be children in need. See Section 50.3 on notifications.

Private fostering and kinship care. A private fostering arrangement is one where a child under 16 (or 18 if disabled) is cared for by someone who is not a parent or close relative for 28 days or more. There is a duty to notify the local authority.

Young carers. Students with caring responsibilities are at heightened risk of absence, tiredness, isolation and reduced attainment. Identification triggers an offer of Family Help and a young carers assessment.

Children in care and care experienced students. The DSL holds details of the social worker and the Virtual School Head and knows the legal status, contact arrangements and care arrangements for each student. The DSL works with the Virtual School Head on the personal education plan and the use of pupil premium plus. Pledge2Learn appoints a designated member of staff to promote the educational achievement of children in care and previously in care as a matter of best practice.

Children with family members in prison. At risk of poor outcomes including poverty, stigma and mental health difficulties; support is offered discreetly.

Children missing from home, care or education. See Section 32. Return home interviews are offered by the local authority and the information from them is shared with the DSL where relevant.

Children and the court system. Students involved in family or criminal proceedings may need support; age-appropriate materials are available to help them understand the process.

Annex 3 — Indicators of abuse and neglect

Physical abuse — hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm, including fabricating or inducing illness.

Indicators: an explanation inconsistent with the injury; several different explanations; unexplained delay in seeking treatment; parents or carers uninterested or undisturbed by an injury; repeated presentation of minor injuries; use of different doctors and A&E departments; reluctance to give information or mention previous injuries; flinching from contact.

Emotional abuse — persistent emotional maltreatment causing severe and adverse effects on emotional development. May involve conveying worthlessness, verbal abuse such as persistent criticism, belittling or name-calling, silencing, age-inappropriate expectations, overprotection, preventing normal social interaction, seeing or hearing the ill-treatment of another, serious bullying, or exploitation or corruption. *Indicators:* developmental delay; abnormal attachment; failure to attach; aggression towards others; being scapegoated in the family; frozen watchfulness; low self-esteem; withdrawal.

Sexual abuse — forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening, including penetrative and non-penetrative contact, and non-contact activities such as involving children in looking at or producing sexual images, watching sexual activity, encouraging sexually inappropriate behaviour, or grooming. It can take place online. It is not solely perpetrated by adult males; women can commit sexual abuse, as can other children. *Indicators:* inappropriate sexualised conduct or language for the child's age; self-harm; disordered eating; suicide attempts; anxious unwillingness to change clothes; pain or itching in the genital area; unexplained bleeding; sexually transmitted infection; pregnancy where the identity of the father is not disclosed.

Neglect — persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of health or development, including failing to provide adequate food, clothing and shelter; to protect from harm or danger; to ensure adequate supervision, or to ensure access to medical care. *Indicators:* unmet basic needs; listlessness with no medical cause; failure to grow as expected; the child thriving away from home; frequent absence; being left with intoxicated or violent adults; being left alone for excessive periods; poor hygiene; inadequate clothing for the weather.

Annex 4 — Body map

A body map is completed by the member of staff who observed the injury, on the day, and uploaded to MyConcern. Photographs of a student are never taken.

Record on the outline of a body, front and back: the location, size in centimetres, shape and colour of any mark, bruise, cut, burn or swelling; whether it was observed directly or described; what the student said, in their own words; who else was present; the date and time of observation; and the name, role and signature of the person completing it. Do not attempt to date a bruise or to state a cause.

Annex 5 — Reporting flowchart

1. **You have a concern about a student.** Act immediately. Do not investigate.
2. **Speak to the DSL (Emma Gill) or Deputy DSL (Callum Cutillo) straight away.** If both are unavailable, speak to a senior leader or contact children's social care directly on 01724 296500. Do not delay.
3. **Record on MyConcern the same day** — facts, in the student's words where possible, with a body map if there is a visible injury.
4. **The DSL decides:** support internally; Family Help assessment; or referral to statutory services. Where a student is suffering or likely to suffer harm, the referral is made **immediately**.
5. **The DSL informs** the commissioning school and, unless it would place the student at risk, the parents or carers.
6. **Follow up.** If you are not satisfied that action has been taken, escalate to the Head of School, then the Chair of the Proprietor Body, and, if the concern remains, make a referral yourself. You will never be criticised for doing so.

Where the concern is about an adult, go to Annex 6. Where it involves disclosed or witnessed child sexual abuse, or a discovery of FGM, see Section 16 — additional mandatory reporting duties apply.

Annex 6 — Concerns about an adult: flowchart

1. **You have a concern about an adult working in or on behalf of Pledge2Learn** — however small, including a nagging doubt.
2. **Does it meet the harm threshold?** Has the person harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way indicating they may pose a risk of harm; or behaved in a way indicating they may not be suitable to work with children?
3. **If yes** — report to the **Head of School** immediately. If the concern is about the Head of School, report to the **Chair of the Proprietor Body**. If there is a conflict of interest, report **directly to the LADO**. Referral to the LADO within **one working day**. Do not investigate. Do not inform the person until advised.
4. **If no** — this is a **low-level concern**. Share it in writing with the Head of School as soon as reasonably practicable (Section 43). It will be recorded centrally and reviewed for patterns.
5. **If you cannot raise it internally, or it is not being addressed** — use the whistleblowing routes at Section 44, including the NSPCC Whistleblowing Advice Line on 0800 028 0285.

Annex 7 — Statutory and guidance references

Legislation. Education (Independent School Standards) Regulations 2014 · School Premises (England) Regulations 2012 · Children Act 1989, ss17, 20, 31, 47 · Children Act 2004, ss10, 11, 16E · Education Act 2002, ss157, 175 · Children’s Wellbeing and Schools Act 2026 (c.21) · Crime and Policing Act 2026 · Equality Act 2010 · Human Rights Act 1998 · Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 · Counter-Terrorism and Security Act 2015, s26 · Female Genital Mutilation Act 2003, s5B · Safeguarding Vulnerable Groups Act 2006, s35 · Sexual Offences Act 2003, s16 · Terrorism (Protection of Premises) Act 2025 · Education (Pupil Registration) (England) Regulations 2006 · Modern Slavery Act 2015 · Serious Crime Act 2015 · Voyeurism (Offences) Act 2019.

Statutory guidance and departmental advice. Keeping Children Safe in Education 2026 · Working Together to Safeguard Children 2026 · Working together to improve school attendance · Behaviour in Schools · Use of reasonable force · Searching, screening and confiscation · Mobile phones in schools · Sharing nudes and semi-nudes: advice for education settings (UKCIS) · What to do if you’re worried a child is being abused · Information sharing: advice for practitioners · Data protection in schools · Filtering and monitoring standards for schools and colleges · Cyber security standards for schools and colleges · Generative artificial intelligence in education · Prevent duty guidance and Prevent duty risk assessment templates · When to call the police: guidance for schools and colleges

(NPCC) · Emergency planning and response for education settings · Keeping children safe in out-of-school settings · Designated teacher for looked-after and previously looked-after children.

Local. North Lincolnshire Children's MARS policies, procedures and guidance, including the escalation and resolution procedure, quality standards for child protection conferences, the protocol on perplexing presentations and fabricated or induced illness, the policy statement on reducing harm from neglect, and the policy statement on protecting disabled children from harm.