



# Safeguarding and Child Protection Policy

The Provision fully recognises its responsibilities for safeguarding and child protection.

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# Version Control

Version	Author	Date	Changes
V 1.0	Executive Headteacher	September 2024	Initial draft as individual provisions to include version control
V 1.1	HR Director	March 2025	Added N Boydell as Prevent Lead
V 1.2	HR Director	May 2025	Added S Hallett as DDSL
V 1.3	Exams & IT Manager	July 2025	Removed J Walker, S Hallett as DDSL. Added M Smith, J Maggs, E White, N Boydell, M Griggs as DDSLs.
V 1.4	HR Director	July 2025	Created one policy - removed reference number extension (a), (b), (c) - merge of primary and secondary into one site. Changed responsibility to Deputy Headteacher.
V 1.5	HR Director	September 2025	Changed Designated Teacher and Prevent Lead to Juliet Maggs
V 2.0	HR Director	September 2025	Added link to non-school alternative provision. Changed Teaching & Learning policy to Curriculum policy. Added Online Safety & Senior Mental Health Leads to key personnel. Updated links to clauses/procedures. Removed reference to renting out premises. Updated reporting process. Added new related legislation including cyber security, AI and filtering & monitoring. Added SVPP flowchart and MHFA's.
V 2.1	Executive Lead for Data, Security & Compliance	December 2025	Amendment of SMHL email address.
V 2.2	HR Director	January 2026	Changed references to the executive leadership team to central leadership team. Changed job titles of key personnel.
V 2.3	HR Director	March 2026	Inclusion of transporting learners

## Key Personnel

Role	Name	Telephone Number	Email Address
Managing Director	Nikita Boydell	07591 657197	<a href="mailto:nikitaboydell@tbap.co.uk">nikitaboydell@tbap.co.uk</a>
Designated Safeguarding Lead (DSL)	Jo Woolley	07856 997420	<a href="mailto:jowoolley@tbap.co.uk">jowoolley@tbap.co.uk</a>
Deputy Designated Safeguarding Lead (DDSL)	Michaela Smith Juliet Maggs Ethan White Nikita Boydell Marcus Griggs	07594 780830 07513 636351 07715 990934 07591 657197 07516 838296	<a href="mailto:michaelasmith@tbap.co.uk">michaelasmith@tbap.co.uk</a> <a href="mailto:julietmaggs@tbap.co.uk">julietmaggs@tbap.co.uk</a> <a href="mailto:ethanwhite@tbap.co.uk">ethanwhite@tbap.co.uk</a> <a href="mailto:nikitaboydell@tbap.co.uk">nikitaboydell@tbap.co.uk</a> <a href="mailto:marcusgriggs@tbap.co.uk">marcusgriggs@tbap.co.uk</a>
Designated Teacher for Looked After Children	Juliet Maggs	07513 636351	<a href="mailto:julietmaggs@tbap.co.uk">julietmaggs@tbap.co.uk</a>
Prevent Lead	Juliet Maggs	07513 636351	<a href="mailto:julietmaggs@tbap.co.uk">julietmaggs@tbap.co.uk</a>
Online Safety Lead	Marcus Griggs	07516 838296	<a href="mailto:marcusgriggs@tbap.co.uk">marcusgriggs@tbap.co.uk</a>
Senior Mental Health Lead	Stacey Gibbs	07835 084545	<a href="mailto:staceygibbs@tbap.co.uk">staceygibbs@tbap.co.uk</a>
Mental Health First Aiders	Jo Woolley Michaela Smith Juliet Maggs Ethan White Imogen Hopkins Marcus Griggs Sian Cox Beth Dombkowski	07856 997420 07594 780830 07513 636351 07715 990934 - 07516 838296 07950 102716 07522 561481	<a href="mailto:jowoolley@tbap.co.uk">jowoolley@tbap.co.uk</a> <a href="mailto:michaelasmith@tbap.co.uk">michaelasmith@tbap.co.uk</a> <a href="mailto:julietmaggs@tbap.co.uk">julietmaggs@tbap.co.uk</a> <a href="mailto:ethanwhite@tbap.co.uk">ethanwhite@tbap.co.uk</a> <a href="mailto:imogenhopkins@tbap.co.uk">imogenhopkins@tbap.co.uk</a> <a href="mailto:marcusgriggs@tbap.co.uk">marcusgriggs@tbap.co.uk</a> <a href="mailto:siancox@tbap.co.uk">siancox@tbap.co.uk</a> <a href="mailto:bethdombkowski@tbap.co.uk">bethdombkowski@tbap.co.uk</a>
Educational Visits Co-ordinator	Nikita Boydell Jo Woolley	07591 657197 07856 997420	<a href="mailto:nikitaboydell@tbap.co.uk">nikitaboydell@tbap.co.uk</a> <a href="mailto:jowoolley@tbap.co.uk">jowoolley@tbap.co.uk</a>

The key safeguarding responsibilities within each of the roles above, are set out in [Keeping Children Safe in Education \(2025\)](#)

Children's Social Care Referrals:  
Integrated Front Door:  
Out of hours

0300 456 0108  
0300 456 0100

If you believe that a child is **at immediate risk** of significant harm or injury, you **must** call the police on 999.

# 1. Introduction

Our Provision is committed to safeguarding and promoting the welfare of children. We will fulfil our local and national responsibilities as laid out in the following key documents:

- [Working Together to Safeguard Children \(2023\)](#)
- [Keeping Children Safe in Education \(2025\)](#)
- [The procedures of Safeguarding Vulnerable People Partnership \(formerly WSCB\)](#)
- [Information sharing - Advice for practitioners providing safeguarding service to children, young people, parents and carers \(May 2024\)](#)
- [Non-school alternative provision \(voluntary national standards\) Aug 2025](#)
- [Alternative Provision - Statutory Guidance 2013](#)

The aim of this policy is to ensure:

- all our learners are safe and protected from harm.
- safeguarding procedures are in place to help learners to feel safe and learn to stay safe.
- adults in the provision community are aware of the expected behaviours and the provision's legal responsibilities in relation to safeguarding and child protection.

# 2. Scope of the policy

Safeguarding children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a whole-provision preventative approach to keeping children safe, including online that incorporates learner health and safety; provision behaviour management and preventing child-on-child abuse; supporting learners with medical conditions; Relationships, Sex and Health (RSHE) education and Personal, Social, Health and Economic (PSHE) education; providing first aid and site security.

Consequently, this policy is consistent with all other policies adopted by the provision and should be read alongside the following policies relevant to the safety and welfare of our learners:

Relationships, Sex and Health Education/PSHE	Staff Behaviour Policy	Curriculum policy
Online safety policy	Whistleblowing policy	Equality Statement
Behaviour policy, incl. learner use of mobile and smart technology	Complaints policy	Administration of medicines
SEND policy	Health and safety policy	

**This policy applies to all staff in our provision.**

For the purposes of this policy:

- Staff refers to all those working for or on behalf of the provision, full-time or part-time, in a paid or regular voluntary capacity.
- A volunteer is a person who performs an activity that involves spending time, unpaid in provision (except for approved expenses).
- Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- Child refers to all children on our provision roll and any child under the age of 18 who comes into contact with our provision. This includes unborn babies.

Any safeguarding concerns or disclosures of abuse relating to a child at provision, outside of provision and online are within the scope of this policy.

### 3. Expectations

All staff are:

- familiar with this safeguarding policy and have an opportunity to contribute to its review.
- alert to signs and indicators of possible abuse and wider safeguarding issues.
- aware of the importance of professional curiosity.
- able to record and report concerns as set out in this policy.
- able to deal with a disclosure of abuse from a child.
- involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

In addition,

- all staff have read and understood Part 1 of the latest version of Keeping Children Safe in Education. Staff working directly with children have also read Annex B of KCSiE.
- staff not working directly with children should read Annex A (a condensed version of Part 1)

### 4. Central Leadership Team

As key strategic decision makers and vision setters for the provision, the Central Leadership Team will make sure that our policies and procedures are in line with national and local safeguarding requirements. Central Leadership Team will work with the senior leaders to make sure the following safeguarding essentials are in place:

Training/Teaching	Policy/Procedures	Key safeguarding role
Whole provision approach to broad and balanced curriculum embedding safeguarding teaching	<a href="#">Child-on-child abuse</a>	Designated Safeguarding Lead (DSL) who is a senior member of the leadership team.
Designated/Deputy Safeguarding Lead training	<a href="#">Learner voice</a>	Deputy Designated Safeguarding Lead (DDSL)
Designated teacher training	Online safety policy	Designated teacher for children looked-after (even if there are no LAC on roll)
KCSiE Part 1 or Annex A (and Annex B and Part 5 for staff working directly with children)	<a href="#">Whistleblowing policy</a>	Prevent lead
	<a href="#">Staff Behaviour Policy</a> (for safer working practice), incl. low-level concerns about staff conduct	Senior mental health lead
	<a href="#">Early help offer</a>	

<p>Staff training, including regular safeguarding updates</p> <p>Children taught about keeping safe online</p> <p>Online safety training for staff</p> <p>Preventing radicalisation</p> <p>Teaching staff confidence to deliver RSHE/PSHE to all learners</p> <p>Annual review of online safety arrangements</p>	<p>Multi-agency working</p> <p><a href="#">Children who are absent and/or missing from education</a> (procedure)</p> <p><a href="#">Special educational needs &amp; disabilities policy</a></p> <p>Reporting abuse, incl. dealing with a child at immediate risk / <a href="#">SVPP procedures</a></p> <p><a href="#">Honour based abuse (HBA)</a></p> <p><a href="#">Female Genital Mutilation (FGM) procedure</a></p> <p><a href="#">Behaviour policy</a></p> <p><a href="#">Relationships, Sex and Health Education (RSHE) policy</a></p>	<p>Filtering and monitoring &amp; online safety lead</p> <p>Mental health first aiders</p>
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## Concerns and allegations management

Our Managing Director or HR Director is responsible for liaising with the Local Authority Designated Officer for allegations (LADO) and other partner agencies in the event of an allegation of abuse being made against the Managing Director.

See also '[Managing concerns and allegations against staff](#)'.

## Audit

The Managing Director collaborates with the Designated/Deputy Safeguarding Lead to complete an annual safeguarding audit return to the local authority.

## Safer Recruitment

Our Managing Director monitors the provision's safer recruitment practice, including scrutiny around Designated Safeguarding Lead and/or Managing Director monitoring of the Single Central Record.

## 5. Monitoring and review

The Managing Director ensures that the policies and procedures, adopted by the provisions (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff and should be easily understood by staff, children and parents, by re-visiting regularly.

The designated leads report monthly to the Central Leadership Team around the effectiveness of the provision's safeguarding procedures, and in particular, child-on-child incidents, including all aspects of trend analysis. The provision's approach to online safety and filtering and monitoring is reviewed annually as a minimum.

The Central Leadership Team ensures that safeguarding is an agenda item for every full Central Leadership Team meeting.

The Designated/Deputy Safeguarding Lead ensures that safeguarding is an agenda item for every staff meeting.

This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance.

The Managing Director meets the Designated Safeguarding Lead every term (six times a year) to monitor the effectiveness of this policy. Online safety will be included on each agenda.

## 6. Mandatory procedures - Staff and adults at provision

### Safer recruitment

All staff are subject to safer recruitment processes and checks, and we follow the guidance set out in Part 3 of KCSiE.

At our Provision, we scrutinise all applications for paid or voluntary posts. We undertake interviews and make appropriate checks through the Disclosure and Barring Service (DBS). We maintain a single central record (SCR) of the essential checks as set out in KCSiE, that have been carried out and certificates obtained. The SCR applies to:

- all staff (including supply staff and teacher trainees on salaried routes) who work at the provision.
- all members of the Central leadership team.
- assurances are sought for contractors who are required on site, including identification checks on arrival. Appropriate vetting checks are carried out by the provision for self-employed individuals.

### Staff Behaviour Policy (for safer working practice)

The Provision is committed to positive academic, social and emotional outcomes for our learners underpinned by a strong safeguarding ethos. We are equally committed to the protection and welfare of our staff, who are expected to adhere to the highest standards of professional behaviour.

The Staff Behaviour Policy sets out staff behaviours that should be avoided as well as those that constitute safe practice and supports our commitment to safeguarding children.

Teaching staff are additionally expected to act within the guidance of the 'personal and professional conduct' section of the Teachers' Standards.

### Visitors

All visitors complete a signing in/out process, wear a provision ID badge and are provided with key safeguarding information including the contact details of safeguarding personnel in provision.

Scheduled visitors in a professional role (e.g. fire officer, police, NSPCC staff) are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at provision. Careful consideration is given to the suitability of any external organisations. The provision completes an assessment of the education value, the age appropriateness of what is going to be delivered by the scheduled visitor prior to booking a visit.

If the visit is unscheduled and the visitor is unknown to the provision, we will contact the relevant organisation to verify the individual's identity, if necessary.

### Site safety

Risk assessments are undertaken and maintained in accordance with the provision's health and safety policy. All sites are spot checked daily to ensure safe working conditions and compliance with health and safety standards.

### Off site visits and exchange visits

Before any off-site or exchange visit, a thorough risk assessment is conducted, and specific roles and responsibilities are assigned to all adults involved, whether staff or volunteers.

The Educational Visits Coordinator and/or SENCO also carry out a site visit to ensure safety. During the visit, if any safeguarding concerns or allegations arise, staff must follow the established procedures, including referencing the SVPP flowcharts, a copy of which is taken on the visit for guidance.

Any adult over 18 in a host family undergoes a DBS check, and when working with international partners, equivalent safeguarding assurances are confirmed prior to learners traveling abroad.

See also [Training](#).

## Transporting learners

### **Purpose**

To ensure that all learner transport is conducted safely, consistently, and in line with safeguarding, GDPR, and organisational expectations.

### **Transport Bag System**

All staff transporting learners in a vehicle must use an authorised Transport Bag. Each bag is numbered and contains the required equipment to support safe transport.

Each Transport Bag includes:

- Dashcam
- Mobile phone
- Phone charger
- Dashcam GDPR signage
- Emergency contact list
- Safeguarding poster

### **Before Transport**

Staff must not transport learners without first collecting a Transport Bag from the office.

The Transport Bag must be signed out, recording:

- Staff name
- Bag number
- Time and date of collection
- Learners being transported

Staff must check that all contents are present and in working order before leaving.

### **During Transport**

The dashcam must be in use at all times during transport.

The dashcam must be:

- Switched on
- Fully functioning
- Positioned facing inside the vehicle

The GDPR signage must be clearly visible whenever the dashcam is in use.

The provided mobile phone must remain:

- Switched on

- Accessible for emergency use

Staff must follow all safeguarding and professional conduct expectations throughout the journey.

### **After Transport**

Upon return to the centre, staff must:

- Return the Transport Bag to the office immediately
- Sign the bag back in on the same day, recording the time
- Plug the mobile phone in to charge

Any issues with equipment (e.g. faulty dashcam, missing items) must be reported immediately to a member of the Central/Senior Leadership Team.

### **Non-Compliance**

Failure to follow this procedure may result in action in line with organisational policies, as this process is a key part of safeguarding and safety protocols.

### **Additional Notes**

Transport Bags are part of the provision's safeguarding measures and must be treated as essential equipment.

Staff must not substitute personal devices for the equipment provided.

## **Identifying the signs**

All staff know how to recognise and are alert to the signs of neglect, abuse, exploitation, and wider safeguarding issues, including but not limited to child-on-child sexual violence and harassment, child-on-child abuse, and 'all' risks of harm outside of the home and within the local area including online. Definitions of abuse, set out in 'What to do if you're worried a child is being abused - Advice for practitioners' (2015), 'Keeping Children Safe in Education' along with notes from safeguarding training, are important reference documents for all staff. Every member of staff is provided with a copy of Part 1 or Annex A of KCSiE which they are required to read, and which also includes supporting guidance about several specific safeguarding issues. Staff who work directly with children are also required to read Annex B and Part 5 of KCSiE.

## **Responding to concerns/disclosures of abuse**

[Flowcharts](#) provided by Wiltshire Council Safeguarding Team and SVPP that set out the required procedure for staff to follow when they have a safeguarding concern about a child are displayed in the staffroom and adult cloakrooms for easy reference.

Staff adhere to the organisation's safeguarding training requirements when concerned about abuse or when responding to a disclosure of abuse. Staff understand that they must NOT:

- take photographs of any injuries.
- postpone or delay the opportunity for the child to talk.
- take notes while the child is speaking or ask the child to write an account.
- try to investigate the allegation.
- promise confidentiality e.g. say they will keep 'the secret'.
- approach or inform the alleged abuser.

All staff record any concern about or disclosure by a learner of abuse or neglect and report this to the Designated/Deputy Safeguarding Lead. This report may initially be verbal and should be followed up using My Concern. It is the responsibility of each adult in provision to ensure that the Designated/Deputy Safeguarding Lead receives the record of concern without delay. In the absence of the Designated/Deputy Safeguarding Lead, staff members know to speak directly to the Integrated Front Door. In some circumstances, the Designated/Deputy Safeguarding Lead or member of staff seeks advice by ringing the Integrated Front Door for advice.

The Designated/Deputy Safeguarding Lead will liaise with safeguarding partners and work with other agencies in line with Working Together (2018) and will refer to National Police Chief's Council guidance for provisions to understand when they should consider calling the police.

The Designated/Deputy Safeguarding Lead will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The Designated/Deputy Safeguarding Lead consistently monitors all children with concerns, whether a request for service to the Wiltshire Integrated Front Door or appropriate Local Authority Children's Services has been made or not.

During term time, the Designated Safeguarding Lead and/or a Deputy Designated Safeguarding Lead is always available during provision hours for staff to discuss any safeguarding concerns. The Designated/Deputy Safeguarding Lead provides feedback to any staff who share concern/s.

The voice of the child is central to our safeguarding practice and learners are encouraged to express and have their views given due weight in all matters affecting them.

## Online safety

### Acceptable Use of the Internet

All learners, parents, staff, volunteers (if appropriate) are expected to sign an agreement regarding the acceptable use of the provision's ICT systems and the internet (ICT Acceptable Use Policy, appendices 1 to 3). Visitors will be expected to read and agree to the provision's terms on acceptable use if relevant. Use of the provision's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role. We will monitor the websites visited by learners, staff, volunteers and visitors (where relevant) to ensure they comply with the above using device monitoring and management software provided by Senso. More information is set out in the acceptable use agreements in the ICT Acceptable Use Policy, appendices 1 to 3.

### Training

All new employees will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All employees will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

### How the provision will respond to issues of misuse

Where a learner misuses the provision's ICT systems or internet, we will follow the procedures set out in our ICT Acceptable Use Policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate. Where an employee misuses the provision's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff disciplinary procedures/staff. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident. The provision will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

### Examination of devices within the provision

The Managing Director and any member of staff authorised to do so by the Managing Director can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or learners, and/or
- Is identified in the provision rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so, as defined in the Online Safety Policy.

## Monitoring arrangements

The Online Safety Lead logs behaviour and safeguarding issues related to online safety. An incident report log can be found in the ICT Acceptable Use Policy, appendix VII. Monitoring and filtering logs are recorded on the Senso Administration Portal.

Online safety is a running and interrelated theme which is reflected in our policies and procedures. Children are taught about safeguarding, including online safety. Online safety is considered as part of our whole provision safeguarding approach and wider staff training (including at induction) and curriculum planning. A personalised or contextualised approach is taken for more vulnerable children, victims of abuse and some children with SEND.

The Provision ensures that parents and carers are made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the provision or college (if anyone) their child is going to be interacting with online. Parents and carers are offered advice and guidance in support of identifying the risks that may be present to children online.

The Provision acknowledges the fact many children have unlimited and unrestricted access to the internet via mobile phone networks, the provision will follow its policy on the use of mobile and smart technology in provision to safeguard children and will follow child-on-child abuse procedures when mobile phones are used by a child whilst in provision to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The provision adheres to the DFE Filtering and Monitoring standards, and the Cyber Security Standards set out in KCSiE. Our online safety mechanisms are reviewed annually.

## Managing concerns and allegations against staff (including supply teachers, volunteers and contractors, and those from organisations or individuals using the provision premises)

The Provision follows the procedure set out by the [SVPP 'Allegations against adults' flowchart](#) which is displayed in the staffroom and cloakrooms for easy reference.

Where anyone in the provision has a concern about the behaviour of an adult (including online) who works or volunteers at the provision, including supply staff and contractors, and those from organisations or individuals using the provision premises, they must immediately consult the Managing Director who will refer to the Local Authority Designated Officer for allegations (LADO).

Any concern or allegation against the Managing Director will be reported to the HR Director and concerns or allegations against the Managing Director will be reported to the LADO without informing the individual.

All staff must remember that the welfare of a child is paramount and must not delay raising concerns for fear a report could jeopardise their colleague's career. The Provision promotes an open and transparent culture in which all concerns about adults working in or on behalf of the provision (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

In addition to the concern/allegation management process, the provision's Designated Safeguarding Lead will also refer suspected abuse to the Wiltshire Integrated Front Door or appropriate Local Authority Children's services as described in 'responding to a concern.'

All members of staff and volunteers have read and signed to confirm they have understood the provision's Staff Behaviour Policy (for safer working practice), all supply staff and contractors are made aware of expectations of their behaviour.

Concerns and allegations reported relating to supply staff and contractors will be notified to their employers for investigation and potential referral to LADO.

The Provision will appoint a 'case manager' to lead any investigation where the reported allegation does not meet the allegations threshold to consider a referral to the LADO. This will usually be one of the designated leads or where they are the subject of an allegation, the Managing Director. The HR Director will be 'case manager' where allegations are made about the Managing Director

## Managing low-level concerns about adults

The Provision operates a 'low-level' concerns policy in accordance with KCSIE. 'Low-level' refers to behaviour that is: inconsistent with expectations set out in the Staff Behaviour Policy, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns will be reported to the Managing Director. Low-level concerns about the Managing Director will be reported to the LADO.

The Provision will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Staff Behaviour Policy), and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult; and,
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and support the individual to correct it at an early stage. If the concern has been raised via a third party, the case manager will collect as much evidence as possible by speaking:
  - directly to the person who raised the concern, unless it has been raised anonymously;
  - to the individual involved and any witnesses.

Reporting low-level concerns helps to create and embed a culture of openness, trust and transparency in which the provision's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing, retained and reviewed to help recognise any weakness in the provisions safeguarding system so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

## Whistleblowing

In accordance with our provision's whistleblowing policy and procedures all staff and learners can raise concerns about poor or unsafe practice and potential failures in the provision's safeguarding regime. Our whistleblowing procedures

(including our child-friendly whistleblowing mechanisms), which are also reflected in staff training and our staff behaviour policy, are in place for such concerns to be raised with a member of the Senior Leadership Team, Designated/Deputy Safeguarding Lead or Central Leadership Team.

The process for whistleblowing is well promoted around each site so that children can confidently report concerns or abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

If a staff member feels unable to raise an issue with the Safeguarding Lead, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- A member of the Central Leadership Team
- The NSPCC whistleblowing helpline - Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## Escalation of concerns

Effective working together depends on an open approach and honest relationships between colleagues and between agencies.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for reconsideration if they believe a decision to act/not act in response to a concern raised about a child is wrong. In such cases the SVPP Case Resolution Protocol is used if necessary.

If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our decision making.

## Record keeping and information sharing

The Provision:

- liaises with partner organisations (schools, Wiltshire Council, social services, youth offending, health, police, connect and commissioners) to ensure any safeguarding records for learners are shared on transition and within 5 days for an in-year transfer or within the first 5 days of the start of a new term:
  - by the setting/provision/organisation previously attended by the child.
  - by our Designated Safeguarding Lead when the child leaves our provision.

For any child dual-registered with another provision/setting/organisation, the provision continues to be responsible for the safeguarding of the placed learner thus the Designated Safeguarding Lead will regularly liaise with the Designated Safeguarding Lead at that base to ensure information is shared in the child's best interests. This includes contextual safeguarding information about relationships that young people form in their neighbourhoods, provisions and online to enable assessment and intervention to happen within these extra-familial contexts.

- keeps clear and comprehensive written records of all learner safeguarding and child protection concerns using an electronic recording system, with a body map, including how the concern was followed up and resolved as well as a note of any action taken, decisions reached and the outcome. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program, etc.
- ensures all learner safeguarding and child protection records are kept securely in a locked location.
- ensures the records incorporate the wishes and views of the learner.

The Designated/Deputy Safeguarding Lead acts in accordance with Information Sharing – Department for Education (DfE) (May 2024) and in line with the Wiltshire Council Record Keeping Guidance which includes details about file

retention. Information about learners at risk of harm is shared with members of staff in keeping with the seven golden rules to sharing information in the DfE guidance.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the Designated/Deputy Safeguarding Lead will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When we become aware that a child is being privately fostered, we remind the carer/parent of their legal duty to notify Wiltshire Children's Social Care. We follow this up by contacting Children's Social Care directly.

## 7. Mandatory procedures - Supporting children

### A culture of listening to children

We have a whole provision approach to listening to children and have systems in place which create an environment where children feel safe to share their concerns and worries and know they will be taken seriously. These systems operate with the best interests of the child at their heart.

Children can safely express their views and give feedback. The provision's safeguarding team is clearly identifiable to our learners. We regularly gather learner voices via forums and surveys, this data informs our practice and policies.

### Curriculum – teaching about safeguarding

Our learners access a broad and balanced curriculum (age and stage of development appropriate) that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

We provide opportunities for learners to develop skills, concepts, attitudes and knowledge that promote their safety, and well-being. The PSHE and citizenship curriculum, incorporating Relationships, Sex and Health (RSHE) education specifically includes the following objectives:

- Developing learner self-esteem and communication skills
- Developing strategies for self-protection including online safety
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

Examples of topics:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour

- the concepts of, and laws relating to-sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- sextortion, and
- safe use of AI and chatbots

## Remote learning

If the provision is required to change the way provision to children is offered due to exceptional circumstances e.g. during a pandemic lockdown, self-isolation, staff responsibilities to remain alert to the signs and risks of abuse to children will continue to apply. In such circumstances:

The Designated Safeguarding Lead will:

- work closely with social care and partner agencies to support children in these circumstances and to identify children who may be at risk for the first time and/or benefit from additional support
- use specific local and national guidance about safeguarding in such circumstances to inform practice e.g. UK Safer internet centre guidance, DfE safeguarding and remote education and will ensure staff, children, and families are provided with written:
  - o amended Designated Safeguarding Lead arrangements as required (names, location and contact details)
  - o temporary changes to procedures for working with children e.g. online.
  - o amended procedures for reporting concerns
  - o safeguarding training arrangements
  - o timescales for such changes so that all children, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

We will ensure the curriculum we offer during such circumstances, continues to promote learners' spiritual, moral, cultural, mental and physical development.

## Early help

At our provision, all our staff can identify children who may benefit from early help as a problem emerges and discuss this with the Designated/Deputy Safeguarding Lead.

The Designated/Deputy Safeguarding Lead uses:

- The Wiltshire's Integrated Front Door (MASH and Early Support Hub).
- The Digital Assessment and Referral Tool as appropriate as part of a holistic assessment of the child's needs.
- The Multi-Agency Thresholds guidance for Safeguarding Children on the Safeguarding Vulnerable People Partnership (SVPP) website about suitable action to take when a learner has been identified as making inadequate progress or having an unmet need.
- Liaises with Wiltshire SEND service
- Various resources to identify and respond to harmful sexual behaviour

## Children with Special Education Needs and Disabilities (SEND) or physical health issues

Learners with additional needs or certain health conditions face an increased risk of abuse and neglect. Staff take extra care to correctly interpret apparent signs of abuse or neglect. We never assume that behaviour, mood or injury relates to the learner's additional needs without further exploration. Staff understand that additional challenges can exist when recognising abuse and neglect in learners with SEND, including communication barriers. Staff recognise that children with SEND are also at a higher risk of peer group isolation and can be disproportionately affected by bullying (including prejudice-based bullying).

To address those additional challenges, extra pastoral support is considered for children with SEND or physical health issues and they are also encouraged to discuss their concerns. The Designated/Deputy Safeguarding Lead works with the Special Educational Needs Co-ordinator (SENCo)/commissioner to identify learners with additional communication needs and whenever possible, these learners are given the chance to express themselves to a member of staff with appropriate communication skills.

A copy of the Special Educational Needs and Disabilities policy is available on our website.

## The use of 'reasonable force' in provision

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between learners or blocking a learner's path, or active physical contact such as leading a learner by the arm out of the classroom.

The provision follows the Department for Education (DfE) guidance on the use of reasonable force and staff in relevant roles receive regular Team Teach training. Physical intervention is only used as a last resort, applying the minimum force necessary and always in line with the school's protocols to ensure the safety and wellbeing of all children

All staff will follow our behaviour policy and all learners are encouraged to follow these expectations to reduce the need for the need for 'use of reasonable force.' Staff will work in collaboration with learners and parents/carers to plan positive, proactive behaviour support which may include support plans, referral to specialist agencies and agreeing actions to reduce the occurrence of challenging behaviour.

## 8. Mandatory procedures - Specific forms of abuse and safeguarding issues

### Child-on-child abuse

All children have a right to attend provision and learn in a safe environment. All child-on-child abuse is unacceptable and will be taken seriously.

In addition, we have a zero-tolerance approach and will respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the provision, and/or online.

Staff recognise that while both boys and girls can abuse their peers, it is more likely that girls will be victims and boys instigators of such abuse. Children who are LGBT may be targeted by other children. Child-on-child abuse is not tolerated, passed off as "banter" or seen as "part of growing up". The different forms of child-on-child abuse is likely to include, but not limited to:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers

- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- ‘upskirting’ or any picture taken under a person’s clothing without their permission or them knowing to obtain sexual gratification or cause humiliation, distress or alarm.
- causing someone to engage in sexual activity without consent
- initiation/hazing type violence and rituals.
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting)
- sexual violence and sexual harassment between children, as defined by Sexual offences act 2003 which considers rape, assault by penetration and sexual assault, all types of sexual violence. Sexual violence and sexual harassment can be between two children, or a group of children and can occur online and offline.

Consequently, child-on-child abuse is dealt with as a safeguarding issue, recorded as such, and not managed through the systems set out in the provision behaviour policy.

Any learner who may have been victimised and/or displayed such harmful behaviours, along with any other child affected by child-on-child abuse, will be supported through the provision’s pastoral system and the support will be regularly monitored and reviewed.

We will address inappropriate behaviour (even if it appears to be relatively innocuous) as this can be an important intervention that may help prevent problematic, abusive and/or violent behaviour in the future.

We acknowledge that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Staff maintain an attitude of ‘it could happen here’ where safeguarding is concerned.

We minimise the risk of child-on-child abuse by providing:

- a relevant, effective curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. The curriculum is updated to reflect changes in legislation, and the mandatory teaching of Relationship Education, Relationship and Sex Education and Health Education
- established/publicised systems for learners to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously
- training to all staff so they understand that child-on-child abuse can and does happen and are trained to be alert to any behaviours that could cause concern
- a clear procedure for all staff to report all incidents as a safeguarding concern to the provision Designated/Deputy Safeguarding Lead.

## Child-on-child sexual violence and sexual harassment

The Designated Safeguarding Lead will follow local and national guidance when there has been a report of sexual violence and harassment between children. This will include liaising with other professionals to develop robust risk and needs assessments and multi-agency safety planning with appropriate specialist targeted work for learners who are identified as posing a potential risk to other children. This is done using a Contextual Safeguarding approach to ensure assessments consider risks posed by any wider environmental factors present in a child’s life. The Designated Safeguarding Lead will record specifically the time and location of the incident, and any action required to make the location safer.

The NSPCC has a dedicated helpline 0800 136 663 to provide children who are victims of sexual abuse in provisions with appropriate support and advice. The helpline also provides support to parents and professionals.

## Serious violence

We are committed to success in learning for all our learners as one of the most powerful indicators in the prevention of youth crime.

Our curriculum includes teaching conflict resolution skills and understanding risky situations to help our children develop the social and emotional skills they need to thrive.

Staff are trained to recognise both the early warning signs of contextual risks and that learners may be susceptible to exploitation and getting involved in gangs as well as indicators that a learner is involved in serious violent crime. They are also aware of the associated risks and know the measures put in place to minimise such risks.

## Children who are absent and/or missing from education

Staff report immediately to the Designated/Deputy Safeguarding Lead, if they know of any child who may be:

- Absent from education persistently, or for prolonged periods and/or on repeat occasions
- Missing – whereabouts unknown or
- Missing education – (compulsory provision age (5-16) with no provision place and not electively home educated)

The designated teacher for Child Looked After and care leavers discusses any unauthorised/unexplained absence of Child Looked After with Virtual Provision when required.

The Designated Safeguarding Lead shares any unauthorised/unexplained absence of children who have an allocated social worker within 24 hours.

Children who do not attend provision regularly can be at increased risk of abuse and neglect. Where there is unauthorised/unexplained absence, and:

- After reasonable attempts have been made to contact the family without success, the Designated Safeguarding Lead follows the SVPP procedure and consults/refers to the Integrated Front Door team as appropriate.
- There are no known welfare concerns about a learner, we follow our procedures for unauthorised absence and report concerns to the commissioner who referred the learner.

## Mental health

All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff understand that:

- Abuse and neglect, or other potentially traumatic adverse childhood experiences can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how
- These experiences can impact on children's mental health, behaviour and education.
- They have a duty to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, they will report this concern using the agreed reporting mechanisms.

## Domestic abuse

Staff understand that domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional harm, including where they see, hear or experience its effects.

The Designated Safeguarding Lead liaises with partner schools/agencies as part of 'Encompass' in Wiltshire. When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the Designated Safeguarding Lead ensures the organisation receives up to date relevant information about the child's circumstances and will ensure key staff provide emotional and practical support to the child according to their needs.

## Preventing radicalisation

Protecting children from the risk of radicalisation is part of provisions' wider safeguarding duties and is similar in nature to protecting learners from other forms of harm and abuse.

Staff use their judgement in identifying learners who might be at risk of radicalisation and speak to the Designated/Deputy Safeguarding Lead if they are concerned about a learner. The Designated/Deputy Safeguarding Lead will always act proportionately, and this may include making a Prevent referral to the Channel support programme or to the Local Authority Children's Services.

## Honour-Based Abuse (HBA)

HBA is a form of abuse committed to protect or defend the perceived honour of a family or community. It can include emotional, physical, and sexual abuse, coercion, controlling behaviour, threats, forced marriage, and in some cases, serious violence or even homicide. Children and young people may be particularly vulnerable, as they can experience pressure from multiple family or community members, making it very difficult to speak out.

In the provision, any concerns or disclosures relating to honour-based abuse must be taken seriously and reported immediately to the Designated Safeguarding Lead.

## Female Genital Mutilation (FGM)

FGM is a form of child abuse and a violation of human rights. It involves the partial or total removal of external female genitalia for non-medical reasons and has no health benefits. FGM can cause severe physical and emotional harm, both immediately and in the long term, and it is illegal in the UK. Children and young people may be at risk if there are signs such as talk of a special ceremony, extended travel abroad, or older female relatives visiting.

Staff must be alert to these indicators and understand that any suspicion or disclosure of FGM must be reported immediately to the Designated Safeguarding Lead, who will take action in line with statutory guidance. Protecting the child's safety and wellbeing is the highest priority.

We will report any 'known' cases of FGM to the police as required by law.

## Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff will inform the Designated Safeguarding Lead immediately if they suspect a child is at risk of forced marriage.

## 9. Staff training

### Induction

The welfare of all our learners is of paramount importance. All staff including the Central Leadership Team and regular volunteers are informed of our safeguarding policy and procedures including online safety, at induction.

Our written induction schedule for staff also includes:

- Safeguarding and Child Protection policy and procedures
- KCSiE
- Online safety
- Whistleblowing policy
- Behaviour Policy (learners)
- Staff Behaviour Policy
- Role and identities of the Designated/Deputy Safeguarding Leads
- The provision's response to children who are absent and/or missing from education, and the provision's protocol about managing absence
- Procedure to follow in case of an allegation being raised against an adult
- Professional disagreement and escalation including the SVPP Case Resolution Protocol

### Safeguarding training

This training is for all staff and is updated yearly to ensure staff understand their role in safeguarding. Any member of staff not present at this whole provision session will undertake this statutory training requirement on their return.

In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as necessary and at least annually. All staff also receive training in online safety and this is updated as necessary.

### Advanced training

The Designated/Deputy Safeguarding Lead has additional multi agency training which is updated every two years as a minimum. The Designated/Deputy Safeguarding Lead also attends multi-agency courses relevant to provision needs. Their knowledge and skills are refreshed at least annually e.g. via e-bulletins or safeguarding networking events with other Designated/Deputy Safeguarding Leads. The Designated/Deputy Safeguarding Lead attends a Wiltshire Integrated Front Door tour.

### Safer Recruitment

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every three years as a minimum.

### Designated Teacher for Children Looked After and Children Previously Looked After

The designated teacher for looked after children has attended training specific to the role.

## Preventing Radicalisation

All staff undertake Prevent awareness training every two years as a minimum.

## Staff support

Due to the demanding, often distressing nature of child protection work, we support staff by providing an opportunity to talk through the challenges of this aspect of their role with a senior leader and to seek further support as appropriate.

## Appendix I - Related legislation and key documents

**Children Act 1989 (and 2004 update)** - The Children Act 1989 gives every child the right to protection from abuse and exploitation and the right to have enquiries made to safeguard his or her welfare. The Act place duties on several agencies, including provisions, to assist Social Services departments acting on behalf of children and young people in need (s17) or enquiring into allegations of child abuse (s47).

**Education Act 2002** - This requires provisions to make arrangements to safeguard and promote the welfare of children and to have regard to guidance issued by the Secretary of State for Education.

**Sexual Offences Act 2003** - This act sets out an offence of 'abuse of trust' - a sexual or otherwise inappropriate relationship between an adult who is responsible for young people and a young person in his/her care.

**Information Sharing** - Department for Education (DfE) Advice for practitioners providing safeguarding services to children, young people, parents and carers (May 2024). This advice is for all frontline practitioners and senior managers working with children, young people, parents and carers who have to make decisions about sharing personal information on a case by case basis.

**Counter-Terrorism and Security Act 2015 (the CTSA 2015)**, section 26 requires all provisions, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

**Mental health and behaviour in provisions (2018)** - advice to help provisions to support learners whose mental health problems manifest themselves in behaviour. It is also intended to be helpful to staff in alternative provision settings, although some of the legislation mentioned will only apply to those alternative provision settings that are legally classified as provisions.

**The Safeguarding Vulnerable Groups Act (2006)** - Section 53(3) and (4) of this applies to provisions if they broker learner accommodation with host families for which the host family receives a payment from a third party, such as a language provision. At a future date, the regulated activity provider will have a duty to carry out a barred list check on any new carer - section 34ZA Safeguarding Vulnerable Groups Act 2006.

**The Teachers' Standards (2013)** - set a clear baseline of expectations for the professional practice and conduct of teachers and define the minimum level of practice expected of teachers in England.

**Children Missing Education (2025)** - Statutory guidance for local authorities and advice for other groups on helping children who are missing education get back into it.

**Preventing and Tackling Bullying (2017)** - Advice for provisions on effectively preventing and tackling bullying.

**Behaviour and Discipline in Provisions (2016)** - Advice for headteachers and provision staff on developing provision behaviour policy, including an overview of their powers and duties.

**Working Together to Safeguard Children (2023)** - Statutory guidance for multi-agency safeguarding, detailing roles, responsibilities, and safeguarding processes.

**Children and Social Work Act 2017** – Updates child protection law, establishes the Child Safeguarding Practice Review Panel, and replaces Local Safeguarding Children Boards with safeguarding partners.

**Keeping Children Safe in Education (2025)** – Sets out legal duties for schools and colleges to safeguard and promote the welfare of children under 18.

**Cyber Security Standards for Schools and Colleges** - These standards outline the expectations for schools and colleges to manage and mitigate cyber risks. They include guidelines on staff training, incident response, and the implementation of robust security measures to protect sensitive data.

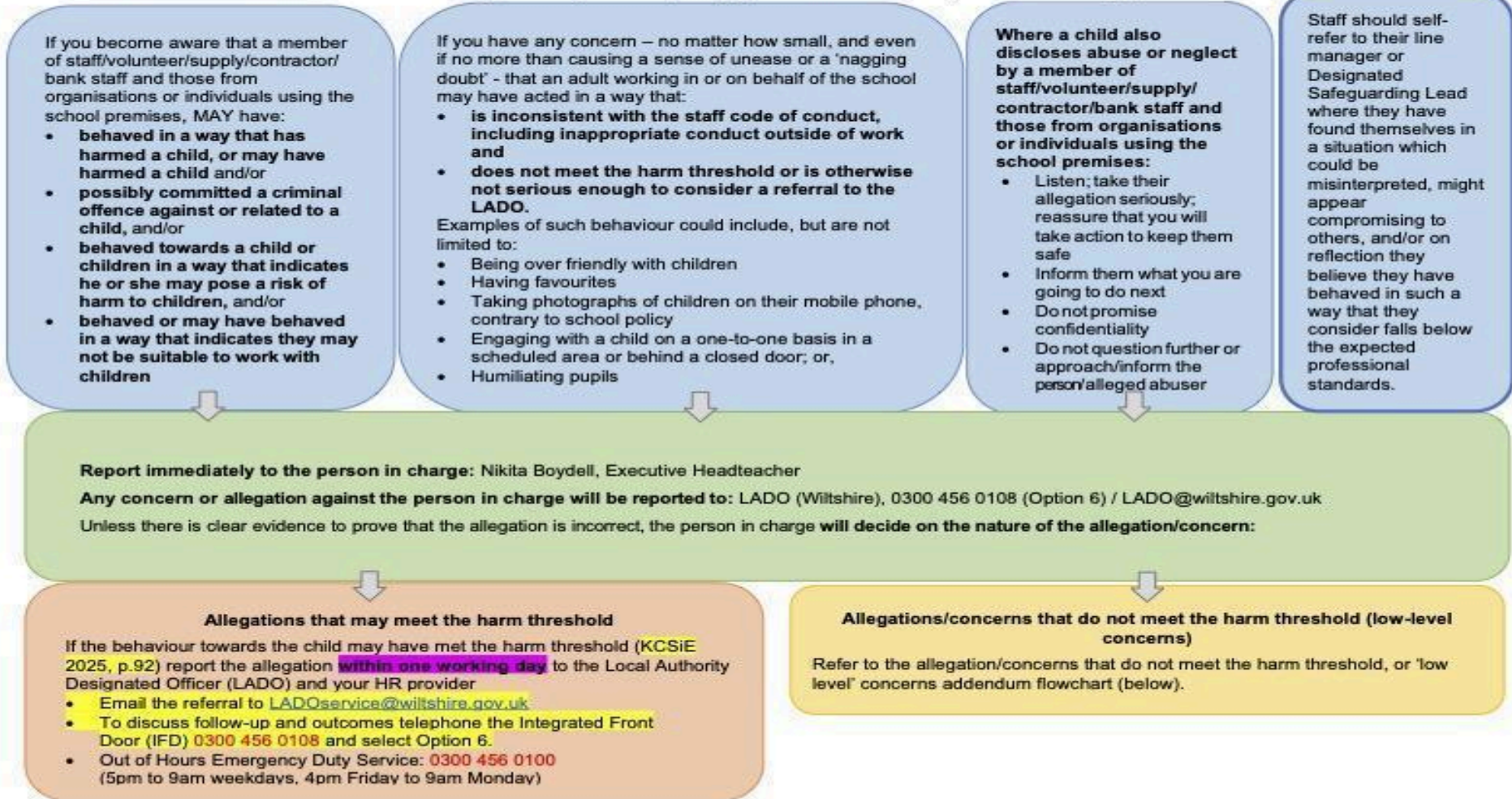
**Generative AI in Education Guidance (2025)** - This guidance emphasizes the need for appropriate safeguards when using generative AI tools in educational settings. It advises on close supervision, the use of AI tools with safety features, and the importance of filtering and monitoring to protect learners.

**Filtering and Monitoring Standards for Schools and Colleges (2024)** - These updated standards require schools and colleges to implement effective filtering and monitoring systems to protect learners from harmful online content. They emphasize the need for real-time protection and regular system reviews.

**Appropriate Filtering and Monitoring Definitions (2025)** - The UK Safer Internet Centre has published updated definitions to assist education settings in establishing appropriate levels of filtering and monitoring, ensuring compliance with statutory safeguarding responsibilities.



**Allegations and concerns against adults in education settings – July 2025  
(including schools, early years and alternative provision settings)**



## Allegation/concerns guidance for persons in charge – July 2025

