



**D**etermination **R**espect **E**ngagement **A**mbition **M**otivation **S**uccess  
Trafford Alternative Education Provision

# Child Protection and Safeguarding

**STATUTORY**

[2025-26]



**Determination Respect Engagement Ambition Motivation Success**

**Trafford Alternative Education Provision**

**Our Mission Statement:**

Trafford Alternative Education Provision is committed to providing....

A 21<sup>st</sup> Century education that promotes the academic, emotional, and social development of our students. Our aim is to create a holistic, nurturing, and inspiring environment where students are supported and encouraged to take charge of their lives, their learning, and their decisions. Every student will have an understanding of their personal journey, challenges, and future opportunities. All will be encouraged to become independent thinkers and learn to value and respect others thus enabling them to meet the challenges of the wider world. In partnership with parents, carers, schools, and outside agencies we will provide students and staff with a positive and supportive learning experience.

We will achieve our vision by constantly thinking about the bigger picture, working as one team, valuing our staff and their continual development, and by frequently reviewing, debating, and developing the curriculum.



**Determination Respect Engagement Ambition Motivation Success**

**Trafford Alternative Education Provision**

<b>Policy Title:</b>	<b>Child Protection and Safeguarding</b>		
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Document Control

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Approvals

<b>Name</b>	<b>Position</b>	<b>Date</b>
Management Committee		

<b>Website</b>	
<b>General Data Protection Regulation (GDPR)</b>	
This policy has been reviewed in line with UK GDPR and the Data Protection Act 2018 to ensure that personal data is handled lawfully, securely and in accordance with statutory requirements.	
Linda H Thompson, Executive Head teacher 	

**Important Contacts**

Role/organisation	Name	Contact details
Designated safeguarding lead (DSL)  Designated Teacher for Looked-After and Previously Looked-After Children.	Linda Thompson  National College Advanced DSL Training	<a href="mailto:linda.thompson@trafford.gov.uk">linda.thompson@trafford.gov.uk</a>  0161 912 1479 07929092049
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	Hannah McMurray National College Advanced DSL Training	Hannah.mcmurray@trafford.gov.uk
Chair of management committee	Carrie Outram	c.oultram@taeponline.co.uk

### Safeguarding Contacts

TAEP ensures all safeguarding referrals and allegations are directed to the appropriate service without delay

Trafford First Response	Children's Social Care	<b>0161 912 5125</b> Emergency Duty Team (out of hours): 0161 912 2020
Trafford LADO	Allegations against staff	0161 912 5125
Police: 999 (emergency)		101 (non-emergency)
Channel helpline	Department for Education	020 7340 7264
Early Help		0161 912 3232 Email: earlyhelp@trafford.gov.uk

A Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) is always available during school hours.

TAEP maintains safeguarding contact arrangements outside normal school hours. Where urgent safeguarding concerns arise, staff should contact the Executive Headteacher via telephone on 07929092049.

Where a child is believed to be at immediate risk of harm, staff must contact the police or Trafford Children's First Response immediately in line with safeguarding procedures.

## Our Safeguarding Team 2025-26



**Safeguarding is everyone's responsibility. All staff act in the best interests of the child at all times.**

### Designated Safeguarding Lead:

Linda Thompson

National College Advanced DSL Training

### Designated Safeguarding Leads:

Jacqui Preston- National College Advanced DSL Training

Sarah Langstreth- National College Advanced DSL Training

Casey Bradbury- National College Advanced DSL Training

Ellis Goulden-Westwood- National College Advanced DSL Training

Dawn Brannigan- National College Advanced DSL Training

Carol Polhill- National College Advanced DSL Training

**Remember: report any concerns about a child, no matter how small, as soon as possible.**

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TAEP recognises that pupils in alternative provision are at increased risk of harm, including criminal and sexual exploitation, county lines involvement, serious violence, missing episodes, poor attendance and mental health vulnerability. Safeguarding practice is therefore proactive, contextual and trauma-informed, taking account of risks within the home, peer groups, community and online environments.

Staff are trained to identify indicators of risk and respond promptly through effective multi-agency working. TAEP works closely with Trafford Safeguarding Children Partnership, Children's Services, health professionals, youth justice services and other partners to ensure timely intervention and appropriate support for pupils and families.

Safeguarding systems are robust and well embedded, with strong leadership oversight, regular DSL supervision and secure recording through CPOMS. All concerns are recorded, reviewed and acted upon without delay to ensure effective risk management and safeguarding responses.

Safeguarding practice is subject to regular scrutiny by the Management Committee and the nominated safeguarding governor, ensuring that systems, procedures and culture remain effective and compliant with statutory guidance.

This policy has been reviewed and contextualised to reflect the specific safeguarding needs, risks and cohort of Trafford Alternative Education Provision (TAEP) as a Pupil Referral Unit.

This policy has been written with regard to

- **Keeping Children Safe in Education (KCSIE) 2025**
- **Working Together to Safeguard Children 2026**
- **Trafford Safeguarding Children Partnership procedures**



# Trafford

Alternative Education Provision

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



All staff, regardless of role,  
**must act in the**  
**best interests** of the **child**  
**at all times.**



## 1. Aims

TAEP aims to ensure that:

- Safeguarding concerns are identified and acted on immediately across all TAEP sites, outreach work and alternative provision partners, recognising the heightened and complex risks facing PRU pupils.
- Staff receive advanced, ongoing training to identify early indicators of safeguarding risk, respond to dysregulation as communication, and escalate concerns swiftly using trauma-informed and multi-agency processes.
- TAEP recognises that online influence, grooming, radicalisation and coercion present heightened risks for PRU pupils. Staff proactively address these issues through Prevent-aligned practice, digital literacy teaching and vigilant monitoring.
- TAEP places strong emphasis on relational and trauma-informed safeguarding practice, ensuring every pupil has access to trusted adults, predictable routines and emotionally safe spaces. Staff recognise that behaviour is communication and that safeguarding concerns may present through disengagement, absence or dysregulation.

## 2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance **Keeping Children Safe in Education (KCSIE)** – current guidance in force and updated annually – and **Working Together to Safeguard Children (2026)**. The 2026 update represents a significant development in national safeguarding expectations and strengthens multi-agency responsibilities, early help, information sharing and child-centred practice.

**Working Together to Safeguard Children (2026)** reinforces:

- stronger multi-agency accountability and clearer expectations for how safeguarding partners (local authorities, police and health) must collaborate effectively; [\[independen...ervice.org\]](#)
- improved expectations for timely, appropriate information sharing to protect children; [\[independen...ervice.org\]](#)
- a strengthened focus on early help, now integrated within a more coherent **Family Help** model that brings together early help and Section 17 support into a single, seamless offer; [\[devonscp.org.uk\]](#)
- anti-racist, anti-discriminatory and culturally informed practice embedded across assessment, planning and intervention; [\[gov.uk\]](#)
- stronger guidance in responding to child sexual abuse, domestic abuse, online harms, contextual safeguarding and overlapping risks; [\[gov.uk\]](#)

- clearer expectations around robust Section 47 processes and multi-agency strategy discussions. [\[gov.uk\]](http://gov.uk)

This policy should be read alongside Trafford's local safeguarding arrangements, Trafford Levels of Need guidance, Trafford Children's First Response pathway, and expectations set by the Trafford Safeguarding Children Partnership.

This policy is also based on the following legislation:

As a maintained pupil referral unit / alternative provision, TAEP also has regard to:

Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training

TAEP also has regards to:

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation).

This means our Management Committee Members and Executive Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group

of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

### 3. Definitions

Safeguarding and promoting the welfare of children is defined as:

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

At TAEP safeguarding and promoting the welfare of children means:

Taking proactive early action to identify concerns, recognising PRU pupils may show distress through behaviour or attendance.

Early help means providing support as soon as a problem emerges at any point in a child's life.

Protecting children from all forms of harm, including contextual and community-based risks common in PRU cohorts.

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.

Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected of suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse, including through grooming, exploitation, coercion, or harmful content

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children include everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

#### **4. Equality Statement/ Multi Agency Statement**

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Multi-Agency Safeguarding Statement

Due to the additional vulnerabilities experienced by many pupils attending TAEP, multi-agency safeguarding work forms an integral part of daily practice rather than an additional process. TAEP works closely with Trafford Children's Services, the First Response Team, health professionals, CAMHS, youth justice services and other safeguarding partners to ensure that concerns are addressed quickly and that families receive appropriate support.

This policy refers to working together to safeguard children 2026, and recognises that with multi agency collaboration there is a renewed focus on how safeguarding partners (local authorities, police, and health) working together effectively. The need to share information in a timely manner with multi agencies is also referenced to emphasize to protect children from harm.

## **5. Roles and Responsibilities**

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, supply staff, contractors and members of the management committee working on or on behalf of TAEP and is consistent with the procedures of Trafford's safeguarding partners. It applies across all TAEP sites, outreach work, educational visits, off-site activities and any commissioned alternative provision or off-site direction.

TAEP plays a crucial role in preventative education. Our pupils may present with additional vulnerability linked to exclusion, trauma, SEND, SEMH, medical needs, social care involvement, family adversity, exploitation risk, low attendance or time spent away from mainstream education. Our safeguarding culture is therefore relational, trauma-informed, vigilant and firmly child-centred.

TAEP recognises that, within a Pupil Referral Unit context, non-attendance and absence from education are significant safeguarding indicators.

All unexplained absence is followed up on the same day through direct contact with parents/carers. Where a pupil is not located, not where expected, or where safeguarding risk is identified, this is escalated immediately to the Designated Safeguarding Lead (DSL).

Escalation may include home visits, multi-agency liaison, and referral to Trafford Children's First Response and/or the police where appropriate. Patterns of absence are closely monitored and triangulated with safeguarding information, including exploitation risk, mental health concerns and contextual vulnerability.

TAEP adopts a support-first approach in line with statutory guidance; however, where safeguarding thresholds are met, immediate protective action will be taken.

TAEP delivers Relationships, Sex and Health Education (RSHE) in accordance with Department for Education statutory guidance. Revised statutory guidance was published in July 2025 and will come into force from 1 September 2026. TAEP will review and update its curriculum, policy and staff training to ensure full compliance by the implementation date

Staff responsible for RSHE delivery access training and curriculum support through the Department for Education RSHE Hub and the National College. These platforms provide high-quality resources, guidance and best practice to support the safe and effective delivery of a planned RSHE curriculum.

RSHE is delivered regularly through a structured and inclusive programme that is age-appropriate and responsive to the needs of pupils within a PRU context. The curriculum addresses key safeguarding and personal development themes, including:

- Healthy and respectful relationships
- Personal boundaries and consent
- Equality, diversity, stereotyping and prejudice
- Body confidence, self-esteem and emotional wellbeing
- Recognising abusive relationships, including coercive and controlling behaviour
- The concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, so-called honour-based abuse (including forced marriage and FGM), and how to access support

TAEP recognises that sexual harassment and sexual violence are always unacceptable and will not be tolerated. These behaviours are not an inevitable part of growing up and will be challenged robustly in line with statutory guidance."

## 5.1 All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's Statutory Safeguarding Guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance. This confirmation will be recorded each year to ensure statutory compliance and maintain a consistent safeguarding standard across the provision.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- At TAEP, all safeguarding concerns must be recorded on CPOMS and reported to the DSL immediately (on the same day).

All staff will be aware of:

- Maintaining an attitude of "it could happen here" where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, behaviour policy, attendance policy, online safety arrangements, filtering and monitoring arrangements, whistleblowing procedures, the role and identity of the DSL and deputies, the safeguarding response to children missing or absent from education, and the use of CPOMS / (TAEP safeguarding recording systems)
- The early help assessment process and their role in it, include identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.

- The importance of reassuring victims is that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection
- staff must understand and identify online risks, including exploitation and harmful content.

## **5.2 The designated safeguarding lead (DSL)**

The DSL or a trained Deputy DSL is always available during school hours and accessible without delay.

Safeguarding advice and support are accessible without delay across all TAEP sites, including outreach and alternative provision

Out-of-hours arrangements for trips, transport, off-site activity and urgent safeguarding matters will be clearly set out in TAEP's visit planning, risk assessment and on-call arrangements.

When the DSL is absent, TAEP's DDSLs will act as cover.

TAEP has multiple trained safeguarding leads. Where the Designated Safeguarding Lead (DSL) or Deputy DSL is not immediately available, this must not delay action.

Staff must take immediate action to safeguard the child and inform the DSL or DDSLs as soon as practically possible. This must not delay a referral to Children's Social Care or the police where required.

The DSL and DDSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Ensure that staff have appropriate Prevent training and induction.

Where relevant, the DSL will work as a lead professional with other agencies and practitioners.

The DSL will also:

- Keep the Executive Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of police investigation or search
- The DSL is responsible for overseeing filtering, monitoring and online safeguarding systems

The full responsibilities of the DSL and DDSLs are set out in their job descriptions and reflect Annex C of Keeping Children Safe in Education 2025.

### **5.3 The Management Committee**

The Management Committee will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Executive Headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior committee-level safeguarding lead to monitor the effectiveness of this policy alongside the full Management Committee. This person will be different from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- All members of the Management Committee receive safeguarding and child protection training at induction and regularly thereafter. This includes annual updates and strategic safeguarding training to enable them to fulfil their statutory responsibilities.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness annually. TAEP uses Smooth Wall filtered internet access and safeguarding monitoring software provided through the IT provider, Stockport Council. Alerts relating to safeguarding concerns such as self-harm, exploitation or harmful online searches are reviewed by safeguarding staff and recorded on CPOMS where appropriate. The Executive Headteacher and Safeguarding Governor review filtering and monitoring arrangements annually in line with the Department for Education Filtering and Monitoring Standard

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authorities for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- TAEP has procedures to manage any safeguarding concerns
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The Chair of the Management Committee will act as the case manager in the event that an allegation is made against the Executive Headteacher, where appropriate
- All members of the Management Committee will receive safeguarding training and understand their statutory responsibilities under KCSIE
- Section 15 of this policy has information on how Management Committee Members are supported to fulfil their role.

#### **5.4 The Executive Headteacher**

The Executive Headteacher is responsible for implementing this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers on admission or placement and publishing it on the TAEP website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the

The Data Protection Officer (DPO) advises TAEP on the data protection and cyber security implications of filtering, monitoring, AI use and digital safeguarding systems. This includes lawful processing, data security, access, retention and breach management. The DPO supports leaders to ensure systems are compliant, proportionate and secure, while operational safeguarding oversight remains with the Executive Headteacher and DSL.

### 5.5 Virtual school heads

TAEP works closely with the Virtual School Head (VSH) to promote the educational outcomes of pupils with a social worker and those in kinship care arrangements. The VSH provides strategic advice and oversight in relation to attendance, progress and attainment. TAEP works in partnership with the Virtual School, DSL, SENCO, social workers, carers and other professionals to ensure coordinated safeguarding support, early help and improved outcomes for vulnerable children

## 6. Confidentiality

TAEP recognises that timely information sharing is essential to effective safeguarding. Safeguarding information will be shared on a need-to-know basis, recorded securely, and handled in accordance with the Data Protection Act 2018, UK GDPR, KCSIE 2025, Working Together 2026 and Trafford local procedures. We use secure safeguarding recording systems, secure email and professional discussions to ensure that concerns, decisions and actions are shared promptly with those who need the information to protect children. Staff will never promise confidentiality to a child were doing so would place that child or another person at risk.

- Timely sharing information is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote welfare, and protect the safety of children

The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)

The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority's children's social care

Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information

- If staff are in any doubt about sharing information, they should speak to TAEP DSL or DDSLs

Confidentiality and information sharing are addressed in Section 16 (Record-Keeping and Information Sharing)

## **7. Recognising abuse and taking action**

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- has a disability

- has special educational needs (whether they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- It is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Online grooming, online sexual abuse, cyberbullying, and online coercion as identifiable risks
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and Management Committee Members must follow the procedures set out below in the event of a safeguarding issue.

In the sections below, references to the DSL should be read as the DSL or DDSL.

### **7.1 If a child is suffering or likely to suffer harm, or in immediate danger**

Make a referral to local authority's children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

In Trafford, concerns that indicate a child may be suffering or likely to suffer significant harm will be referred without delay to Trafford Children's First Response. Professionals should use Trafford's local referral pathway and Levels of Need guidance. If information must be shared urgently, staff will telephone Children's First Response immediately on 0161 912 5125 and, outside office hours, contact the Emergency Duty Team on 0161 912 2020. If a child is in immediate danger, staff will call 999.

## **7.2 If a child makes a disclosure to you**

- If a child discloses a safeguarding issue to you, you should:
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready or know how to tell someone they are being abused, exploited or neglected
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

## **7.3 If you discover that FGM has taken place or a pupil is at risk of FGM**

Keeping Children Safe in Education explains that FGM comprises all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators of abuse and neglect are outlined in this policy and in Keeping Children Safe in Education 2025. Indicators that a pupil may have already been subjected to female genital mutilation (FGM), and factors that may suggest a pupil is at risk of FGM, are also set out in line with Keeping Children Safe in Education 2025 and the multi-agency statutory guidance on FGM.

Any teacher who either:

Is informed by a girl under 18 that an act of FGM has been carried out on her; or

Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

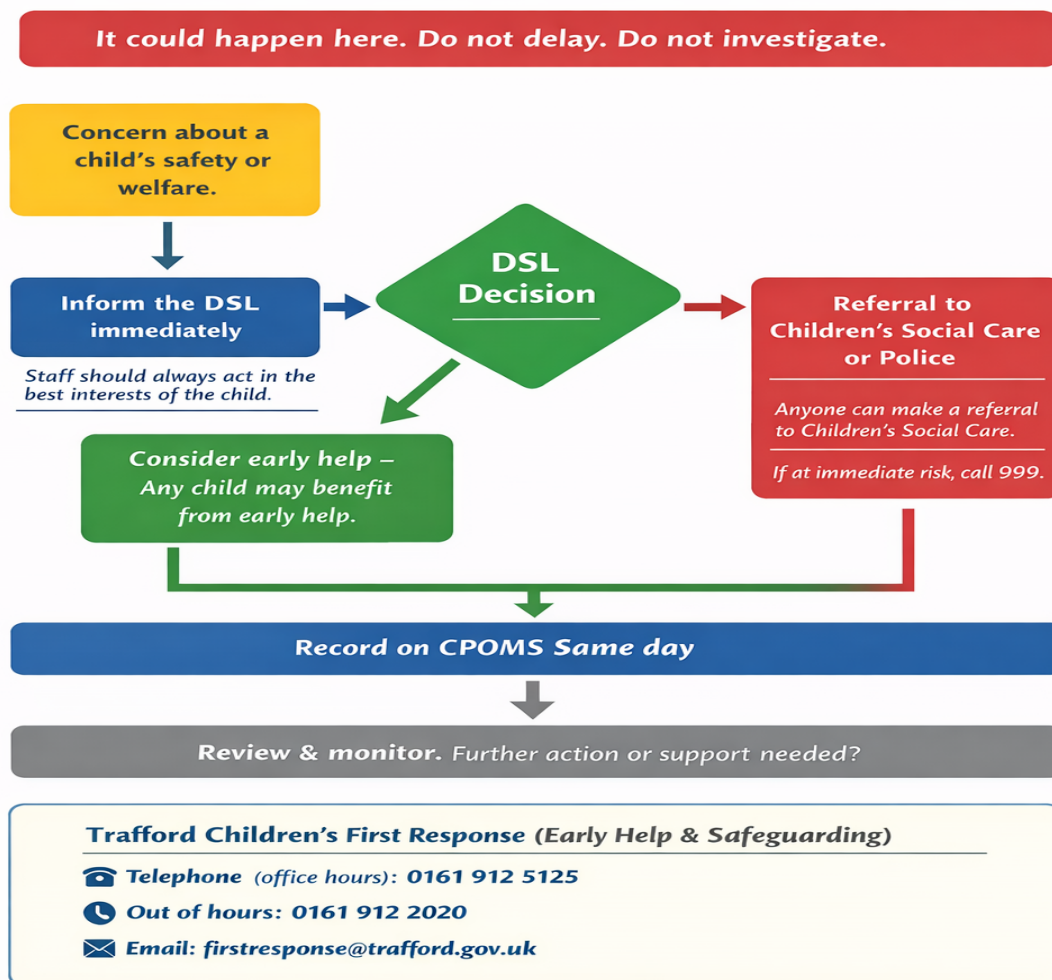
Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

Any concern that a child is at risk of FGM will be discussed immediately with DSL and managed in line with Trafford safeguarding procedures.

**7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

**Figure 1: What to do if you have a Safeguarding Concern**



## Safeguarding Action and Escalation

TAEP has multiple trained safeguarding leads. Where the Designated Safeguarding Lead (DSL) or Deputy DSL is not immediately available, this must **not delay safeguarding action**.

All staff must:

- Take immediate action to protect the child
- Seek advice and support as required
- Contact Trafford Children's Social Care or the police directly where appropriate

Staff may also seek advice from the **NSPCC Helpline (0808 800 5000)** at any time.

Any actions taken must be:

- **Recorded on CPOMS on the same day**
- **Shared with the DSL as soon as practically possible**

## **Early Help**

Where concerns do not meet the threshold for statutory intervention, TAEP will initiate **Early Help** in line with **Trafford Levels of Need guidance**.

Early Help may include:

- Team Around the Family (TAF) / Team Around the School processes
- Multi-agency support
- Pastoral intervention
- Attendance support planning

The **DSL retains oversight of all Early Help activity**, ensuring:

- Regular review of cases
- Timely escalation where risk increases or progress is insufficient

Where appropriate, the DSL will:

- Lead on inter-agency assessments
- Coordinate with external professionals
- Support staff acting as Lead Practitioner where required

TAEP will continue to monitor all Early Help cases and will **refer to Children's Social Care without delay** if concerns escalate or outcomes are not improving.

## **Referral**

Where a referral to Children's Social Care or the police is required:

- The **DSL will normally make the referral**, or support staff to do so
- If a staff member makes a referral directly, they **must inform the DSL immediately**

The local authority should:

- **Acknowledge and decide next steps within 1 working day**

If no outcome is received:

- The DSL (or referrer) must follow up
- All actions and outcomes must be clearly recorded

If the child's situation does not improve:

- The DSL will follow Trafford escalation procedures
- Challenge decisions professionally where necessary
- Maintain ongoing review of risk and impact

For all referrals, the DSL will record:

- Rationale
- Actions taken
- Outcomes
- Any follow-up or escalation

### **7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, it is possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and Management Committee Members can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group

- See or hear something that may be terrorist-related

### **7.6 If you have a concern about mental health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

TAEP recognises the close relationship between mental health, behaviour, attendance, trauma and safeguarding. Staff will consider whether presenting SEMH needs, dysregulation, self-harm, suicidal ideation, emotionally based school non-attendance, substance misuse or repeated risk-taking behaviour may indicate unmet safeguarding need. Concerns will be discussed with the DSL, SENCO and relevant leaders, and escalated to health, CAMHS, social care or emergency services as appropriate.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

### **7.7 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Executive Headteacher as soon as possible. If the concerns/allegations are about the Executive Headteacher, speak to the chair of Management Committee Members

All allegations that meet the harm threshold will be reported to the LADO without delay and within 1 working day.

If the concerns/allegations are about the Executive Headteacher, speak to the local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Executive Headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

TAEP will inform Ofsted of any allegation meeting the harm threshold in line with regulatory requirements and within required timescales

### **7.8 Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as banter, just having a laugh or part of growing up, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could pupils in the school be at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Procedures for dealing with allegations of child-on-child abuse

- If a pupil makes an allegation of abuse against another pupil:
- You must record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of it could happen here
- If they have any concerns about a child's welfare, they should act on them immediately rather than waiting to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **7.9 Sharing of nudes and semi-nudes ('sexting')**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately. Images should not be viewed unless absolutely necessary and only by the DSL as part of a safeguarding decision

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Images should not be viewed unless absolutely necessary and only by the DSL as part of a safeguarding decision. This decision must be recorded on CPOMS.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the pupils(s) that they will receive support and help from DSL

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care

- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the pupils involved which would influence risk assessment

- If there is a need to contact another school, college, setting or individual

Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)

What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any pupil in the images or videos is under 13

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Executive Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will normally be done through 101, through existing local police / safer schools links where available, or by calling 999 in an emergency.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes through TAEP's relationships, sex and health education, computing, safeguarding, personal development and pastoral curriculum.

What it is

How it is most likely to be encountered

The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

Issues of legality

The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

## **7.10 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils are encouraged to report concerns to any trusted adult, including tutors, teachers, mentors, pastoral staff, site leaders, the DSL or DSL. TAEP reinforces reporting routes through tutor time, PSHE / RSHE, assemblies, key-worker conversations, restorative work, posters and daily relationship-based practice. We recognise that many pupils in alternative provision disclose gradually, through behaviour, attendance patterns or trusted relationships, so staff will use professional curiosity, listen carefully and act promptly on even low-level indicators of risk.

## **8.0 Missing Pupils / Leaving Site**

- TAEP recognises that pupils leaving the site or not being where expected presents a significant safeguarding risk.
- Any pupil who leaves the site without permission goes missing during the school day or cannot be located will be treated as a safeguarding incident. Immediate action will include site search, contact with parents/carers, and escalation to the DSL without delay.
- Parents/carers will be required to confirm by telephone when the pupil has returned home safely. Where this cannot be confirmed, or risk remains, the police will be contacted without delay

Where risk is identified, TAEP will contact the police and/or Trafford Children's First Response in line with local safeguarding procedures. All incidents are recorded on CPOMS and reviewed to identify patterns, triggers and risk.

## **9.0 Online Safety and the use of mobile technology**

KCSIE outlines that your policies on online safety and the use of mobile and smart technology should be reflected in your child protection and safeguarding policy. Among other things, this should include filtering and monitoring on school devices and the school network.

TAEP has a clear filtering and monitoring system in place which is regularly reviewed by leaders and governors. Alerts are monitored daily by designated safeguarding staff. Concerns are recorded on CPOMS and acted upon in line with safeguarding procedures. The effectiveness of filtering and monitoring systems is reviewed termly, with oversight from the management committee.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues to address this, TAEP aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Management Committee Members

Filtering and Monitoring Self-Assessment

TAEP follows the Department for Education **Filtering and Monitoring Standards for Schools and Colleges**.

The Executive Headteacher, DSL, safeguarding governor and IT service provider complete the DfE Filtering and Monitoring Self-Assessment annually to ensure that systems remain effective, proportionate and aligned with current safeguarding risks.

### **Cyber Security and Safeguarding**

TAEP recognises that cyber security forms part of safeguarding because system breaches may expose sensitive safeguarding information or enable harm to children.

TAEP follows **DfE Cyber Security Standards for Schools and Colleges** and implements:

- Multi-factor authentication (MFA) for staff systems where appropriate
- secure data backups to protect safeguarding and pupil records
- regular software patching and system updates
- secure configuration of networks, devices and access permissions
- monitoring for suspicious activity or unauthorised access

Cyber incidents that may affect safeguarding information will be treated as **safeguarding risks and reported immediately to senior leaders and relevant authorities where required**.

Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole school community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories. The school acknowledges that **misinformation, disinformation, and conspiracy theories** are recognised safeguarding harms within KCSIE 2025 and will address these risks through staff awareness, online safety measures, and pupil digital literacy education
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and Management Committee Members aware that they are expected to sign an agreement regarding the acceptable use of the

internet in school, use of the school's ICT systems and use of their mobile and smart technology

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.

TAEP follows the DfE Searching, Screening and Confiscation guidance (2023). Searches are only undertaken where there are reasonable grounds to suspect risk of harm and are carried out in a lawful, proportionate and safeguarding-led manner.

Within a PRU context, TAEP recognises that prohibited items may indicate wider vulnerability, exploitation or contextual risk. All searches:

- consider SEND, SEMH and individual risk factors
- are conducted with regard to dignity and trauma-informed practice
- are undertaken by trained staff, with a second adult where appropriate

Any concerns identified through searching are treated as safeguarding:

- recorded on CPOMS immediately
- reported to the DSL without delay
- referred to external agencies where thresholds are met

TAEP balances safety with pupils' Article 8 rights (privacy), ensuring any search is justified and recorded. Procedures include clear guidance on prohibited items, screening, electronic devices, recording and parental communication, in line with DfE expectations.

This approach ensures a safe environment while protecting vulnerable pupils within a PRU setting.

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

### **9.1 Artificial intelligence (AI)**

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

TAEP recognises that AI has many uses, including to support teaching, administration and safeguarding practice. However, AI may also facilitate harm, including deepfake imagery, cyberbullying, exploitation, grooming, misinformation and the generation or circulation of harmful content.

TAEP will treat any misuse of AI to harm, bully, humiliate, exploit or deceive pupils or staff as a safeguarding concern and, where appropriate, a behaviour, disciplinary or police matter, in line with this policy, the behaviour policy, the online safety policy and staff conduct expectations.

AI-generated indecent images of children will be treated as child sexual abuse material and referred to police

Staff should be aware of the risks of using AI tools while they are still being developed and should only use approved systems in line with data protection, confidentiality and safeguarding requirements. TAEP's filtering, monitoring, search, supervision and incident-response arrangements apply equally to AI-generated content. Any AI-generated indecent image, sexualised image, deepfake, threatening message or exploitative content involving a child will be managed as a safeguarding incident and referred externally where required.

## 10.0 Notifying Parents or Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 11.0 Pupils with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils. This includes small-group and key-worker support; trauma-informed practice; adapted communication; SEND-informed risk assessment; multi-agency planning; individual timetables or phased reintegration where appropriate; safe and supervised spaces; and close liaison with families, health professionals, social workers and commissioners.

TAEP provides tailored pastoral support for pupils with SEND or communication needs through key-worker mentoring, small-group intervention, regulated spaces and trauma-informed approaches. Staff use adapted communication methods such as visuals, simplified language, social stories and supported conversations to help pupils express their views and share safeguarding concerns. We work closely with families and specialist services to ensure communication needs are understood and pupils can engage safely and confidently in all safeguarding processes.

Any abuse involving pupils with SEND will require close liaison with the DSL (or ) and the SENCO.

## 12.0 Pupils with a Social Worker

### Role of Social Workers

- Social workers play a vital and unique role because of their regular contact with vulnerable children and families. They are expected to:
  - Identify emerging attendance concerns early—even before patterns of absence develop.
  - Work collaboratively with schools and council attendance teams to provide support or escalate concerns.

- Build strong relationships with the local authority **School Attendance Improvement Team**, where one exists. [\[gov.uk\]](http://gov.uk)

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

### 13.0 Looked After and Previously Looked After Children

TAEP recognises the additional safeguarding needs of children who are looked after and previously looked after.

Staff receive training to understand their vulnerabilities and promote stability, attendance, and educational progress.

The school works closely with the Virtual School Head and other agencies to ensure appropriate support is in place. We will ensure that staff have the skills, knowledge and understanding.

- Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher / senior leader for cared for and previously cared for children.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be

best used to support looked-after children and meet the needs identified in their personal education plans

Currently the Designated Teacher for Looked After and Previously Looked After Children is the Executive Headteacher

- TAEP recognises that children who are looked after and previously looked after are a particularly vulnerable group and require additional support to achieve their full potential.
- The school has a Designated Teacher who is responsible for promoting the educational achievement of these pupils, in line with statutory guidance.
- The Designated Teacher:
  - is a qualified teacher
  - works closely with the Virtual School Head, social workers and other professionals
  - The Designated Teacher (Executive Headteacher) ensures PEPs are in place, promotes progress and works with the Virtual School Head.
  - promotes high aspirations, attendance and progress
  - supports staff to understand the impact of trauma, attachment and loss
  - ensures appropriate information sharing while maintaining confidentiality

TAEP ensures that staff understand the additional barriers faced by looked after and previously looked after children, including:

- disrupted education
- attachment difficulties
- social, emotional and mental health needs
- The Designated Teacher will work with the safeguarding team to ensure that any safeguarding concerns for these pupils are identified early and responded to appropriately.

#### **14.0 Pupils who are lesbian, gay, bisexual or gender questioning**

The section of KCSIE 2025 on gender questioning children remains under review pending revised national guidance. TAEP will continue to take a cautious, child-centred, safeguarding-led approach informed by current statutory guidance, equality duties, parental engagement and any relevant clinical advice. Safeguarding practice for gender-questioning pupils will be updated once final KCSIE 2026 guidance is published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or questioning their gender can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that pupils who are lesbian, gay, or bisexual or questioning their gender are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## 15.0 Complaints and Concerns about School Safeguarding Policies

### 15.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff

### 15.2 Other complaints

Safeguarding-related complaints from pupils, parents, carers, commissioners or professionals will be taken seriously and responded to promptly. Concerns relating to pupils, staff conduct, site safety, use of reasonable force, off-site provision, attendance practice or safeguarding culture will be routed through the DSL and senior leaders and, where appropriate, considered under TAEP's complaints, behaviour, health and safety, whistleblowing, HR and safeguarding procedures. Concerns that meet the allegations threshold will be managed in line with Part Four of Keeping Children Safe in Education, local authority LADO procedures and TAEP's staff disciplinary procedures, as appropriate

### 15.3 Raising Concerns About Safeguarding Practice (Whistleblowing)

TAEP promotes a culture of openness where all staff are expected to raise concerns about safeguarding practice, staff conduct, or any failure to protect pupils.

Concerns may include unsafe practice, failure to act on safeguarding concerns, breaches of professional conduct, or weaknesses in safeguarding systems.

Staff should report concerns to:

- the **DSL or DDSL**
- the **Executive Headteacher**

Concerns about the Headteacher must be reported to the **Chair of the Management Committee**.

If staff feel unable to raise concerns internally, or believe concerns are not being addressed, they may contact:

- **Trafford Children's Social Care / First Response**
- **Local Authority Designated Officer (LADO)**
- **NSPCC Whistleblowing Helpline**
- **Ofsted**

TAEP will:

- take all concerns seriously
- act promptly in line with Trafford safeguarding procedures
- keep clear and confidential records
- take appropriate action, including referral or disciplinary processes where required

Staff who raise concerns in good faith will be **supported and protected from detriment or victimisation**. Malicious allegations may result in disciplinary action.

## 16.0 Record- Keeping

We will hold records in line with our records retention schedule.

The school maintains a record of all safeguarding training.

All safeguarding concerns must be recorded on CPOMS on the same day.

Records must be factual, clear, and include actions taken. The DSL will review all concerns promptly and ensure appropriate action, escalation, and multi-agency involvement where required.

Safeguarding records are stored securely and transferred appropriately when a pupil moves setting.

All staff understand that recording a safeguarding concern is not optional and must take place immediately.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.

- Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be:

- within 5 days for an in-year transfer, or within the first 5 days of the new term or sooner where risk is identified

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

TAEP records safeguarding concerns, decisions, actions and outcomes on our secure safeguarding - CPOMS with restricted access according to role. Records are factual, contemporaneous, signed or attributable, and sufficiently detailed to support decision-making, challenge and multi-agency working. All safeguarding concerns are recorded on CPOMS on the same day by the member of staff identifying the concern. The Designated Safeguarding Lead (DSL) reviews all entries daily and ensures appropriate action is taken. Chronologies are maintained for all pupils with safeguarding concerns.

The DSL conducts regular audits of safeguarding records to ensure quality, consistency and timely action. Safeguarding data and themes are reported termly to the Management Committee to ensure oversight and accountability.

## 17.0 Safeguarding Training

### 17.1 All staff

TAEP ensures that all staff receive appropriate safeguarding and child protection training at induction and regularly thereafter, in line with statutory requirements.

Given the nature of TAEP, staff receive additional training to support vulnerable learners, including:

- trauma-informed practice
- attachment and adverse childhood experiences (ACEs)

- behaviour as communication
- de-escalation and relational approaches
- mental health and SEMH needs

All staff receive safeguarding and child protection training at induction, including whistleblowing procedures and online safety, ensuring they understand TAEP's safeguarding systems, their responsibilities, and how to identify signs of abuse, exploitation and neglect.

Safeguarding training is regularly updated and embedded within a whole-school approach, aligned with advice from the three safeguarding partners and integrated into wider staff training and curriculum planning.

### **Induction**

All staff (including temporary staff, volunteers and contractors) receive safeguarding induction which includes:

- the Child Protection and Safeguarding Policy
- the staff Code of Conduct
- the behaviour policy
- safeguarding response to children who go missing from education
- the role and identity of the **Designated Safeguarding Lead (DSL)** and **Deputy Safeguarding Lead (DDSLs)**
- Part 1 (and Annex B where appropriate) of **Keeping Children Safe in Education (KCSIE) 2025**

Staff must confirm that they have read and understood these documents.

All staff undertake:

- **Annual face-to-face safeguarding training each September**
- **Weekly safeguarding updates**, including briefings informed by Andrew Hall, The Key and National College courses
- Regular updates through staff meetings, emails and briefings

Training includes:

- recognising signs of abuse, neglect and exploitation
- child- on- child abuse
- online safety and filtering/monitoring systems

- contextual safeguarding risks (including criminal and sexual exploitation)
- the Prevent Duty (radicalisation and extremism)
- local safeguarding procedures (Trafford)
- Online safety, including staff roles and responsibilities for filtering and monitoring
- Awareness of safeguarding risks, including contextual safeguarding and exploitation
- Understanding of professional responsibilities in line with the Teachers' Standards

All staff receive National College Prevent training to enable them to identify pupils at risk of radicalisation, challenge extremist views and respond appropriately in line with safeguarding procedures.

Safeguarding training ensures staff can:

- Maintain a safe and well-managed learning environment
- Understand and respond to the needs of vulnerable pupils
- Identify, record and report concerns promptly

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **17.2 The DSL and DDSLs**

The Designated Safeguarding Lead (DSL) and DDSLs undertake advanced child protection and safeguarding training annually through National College Advanced DSL Training to ensure their knowledge and practice remain current with statutory guidance and emerging safeguarding risks. TAEP has a strong safeguarding leadership capacity, with nine members of staff trained to Advanced DSL level, ensuring that safeguarding expertise is embedded across the provision and that appropriate safeguarding advice and leadership are available across all TAEP sites.

We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies via National College.

Where professionals disagree about safeguarding decisions, TAEP will follow the Trafford Safeguarding Children Partnership escalation procedures to ensure concerns are appropriately reviewed.

### **17.3 Management Committee**

All Management Committee Members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenges

Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of Management Committee Members may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Executive Headteacher, they receive training in managing allegations for this purpose.

### **17.4 Recruitment – interview panels**

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

### **17.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for reflection.

Safeguarding training is responsive and adapted to emerging themes identified through CPOMS, audits and case reviews, ensuring staff remain alert to current and contextual safeguarding risks.

## **18. Safer Recruitment and Single Central Record (SCR)**

The Single Central Record includes all statutory checks in line with KCSIE, including identity, enhanced DBS with barred list, right to work, qualifications, references, prohibition from teaching, section 128 (where applicable), and online searches. It records all required pre-employment checks for staff, volunteers and visitors, is securely held, regularly reviewed, and monitored by senior leaders and governors to ensure safeguarding compliance.

TAEP is committed to safer recruitment practices that help deter, identify and reject unsuitable individuals from working with children, in line with statutory guidance.

## Safer Recruitment

TAEP ensures that all recruitment processes are conducted in accordance with **Keeping Children Safe in Education (KCSIE) 2025**.

This includes:

- clear safeguarding statements in all job advertisements
- application forms (CVs are not accepted as a standalone application)
- scrutiny of employment history and gaps
- verification of identity and qualifications
- at least one panel member trained in **Safer Recruitment**
- appropriate references obtained and checked prior to appointment
- face-to-face interviews that explore safeguarding suitability

TAEP will:

- carry out all required **pre-employment checks**
- ensure candidates understand safeguarding responsibilities
- maintain a culture of vigilance throughout the recruitment process

## Pre-Employment Checks

All required checks are completed before an individual starts work, including:

- **enhanced DBS check** (with barred list where applicable)
- identity verification
- right to work in the UK
- prohibition from teaching check (where applicable)
- prohibition from management check (where applicable)
- qualifications verification
- overseas checks where required

Where appropriate, a **risk assessment** will be carried out for any delayed DBS disclosure, and appropriate supervision will be in place.

## **Single Central Record (SCR)**

TAEP maintains an accurate and up-to-date **Single Central Record (SCR)** in line with statutory requirements.

The SCR includes all staff, supply staff, volunteers, governors and contractors working in regular contact with children, and records:

- identity checks
- DBS and barred list checks
- prohibition checks
- right to work in the UK
- qualifications (where required)
- date checks were completed

The SCR is:

- regularly monitored and quality assured by senior leaders
- reviewed by the Management Committee
- subject to audit as part of safeguarding oversight

## **Ongoing Vigilance**

Safer recruitment does not end at appointment.

TAEP ensures:

- all staff understand their safeguarding responsibilities
- concerns about staff conduct are managed in line with safeguarding and allegations procedures

## **19.0 Monitoring Arrangements**

This policy will be reviewed annually by the Executive Headteacher / DSL and approved by the TAEP Management Committee. It will also be updated earlier where there are statutory changes, local procedure changes, learning from incidents, audit findings or significant contextual safeguarding issues. The Management Committee receives regular safeguarding reports which include oversight of online safety, filtering and monitoring systems, emerging online risks and safeguarding incidents, in line with the Department for Education filtering and monitoring standards.

TAEP reviews safeguarding systems annually against Department for Education safeguarding standards, including filtering and monitoring, cyber security, safer recruitment and alternative provision oversight, to ensure safeguarding arrangements remain robust and Safeguarding practice is subject to regular quality assurance, including DSL supervision, safeguarding audits, case file reviews and reporting to the Management Committee. This ensures leaders have an accurate understanding of safeguarding effectiveness in practice.

The Management Committee will receive termly safeguarding reports and undertake an annual safeguarding audit

## 20.0 Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance: 'Working Together to Improve School Attendance' as required under KCSIE 2025.
- Online safety
- AI
- Mobile phone use
- Equality
- Relationships and sex education
- Curriculum
- Designated teacher for cared for and previously cared for children
- Privacy notices

These appendices are based on the Department for Education’s statutory guidance, Keeping Children Safe in Education

**Appendix 1 – Types of Abuse**

# Keeping Children Safe in Education

What all staff should know

## Forms of Abuse and Neglect

**Physical Abuse**  
Causing physical harm to a child.

**Sexual Abuse**  
Forcing or enticing a child to take part in sexual activities, not necessarily involving violence.

**Emotional Abuse**  
Severe and persistent adverse effects on a child’s emotional development.

**Neglect**  
Persistent failure to meet a child’s basic physical and/or psychological needs.

**Child Sexual Exploitation (CSE)**  
Occurs where an individual or group takes advantage of an imbalance of power to manipulate a child for sexual purposes. It may appear consensual but is exploitative.

**Children can be victims of domestic abuse.**  
**So-called ‘honour-based’ abuse.**  
Including forced marriage and FGM.

## Child-on-Child Abuse

**Children can abuse other children, and this is always a safeguarding concern.**

- Sexual violence and sexual harrasment
- Physical violence
- Bullying (including cyberbullying)
- Upskirting
- Initiation / hazing



**Abuse can happen online and offline.**  
Children can be reluctant to speak out.  
**Children may not feel ready or able to tell anyone what is happening.**  
**Report any concerns, however small – every concern matters.**

## Appendix 2 – Safer Recruitment and Single Central Record (SCR)

Trafford Alternative Education Provision (TAEP) is committed to safeguarding and promoting the welfare of children and young people. TAEP follows Part Three of KCSIE, including safer recruitment checks, prohibition checks, section 128 checks where applicable, and maintaining a compliant Single Central Record

### Recruitment Principles

TAEP will ensure that:

- safeguarding is embedded throughout the recruitment process
- all applicants are assessed for their suitability to work with children
- safer recruitment practices deter and prevent unsuitable individuals from working with pupils
- at least one member of every interview panel has completed **safer recruitment training**

### Pre-Employment Checks

All appointments (including staff, supply staff, volunteers and contractors) are subject to the following checks, as appropriate:

#### Identity Verification

- photographic ID and proof of address are checked

#### Enhanced DBS Check

- an enhanced DBS certificate with **children's barred list check** is obtained before employment
- no individual will start work without appropriate clearance unless risk-assessed and supervised in line with KCSIE

#### Prohibition Checks

- prohibition from teaching check (where applicable)
- prohibition from management (section 128) check where required

#### Right to Work in the UK

- verified in line with Home Office guidance

## Qualifications

- original certificates are seen and verified

## References

- at least **two references**, including the most recent employer
- references are obtained **before interview where possible** and scrutinised for safeguarding concerns

## Employment History

- a full history is obtained and any gaps are explored

## Online Searches

- online searches may be conducted as part of due diligence to identify any safeguarding concerns

## Volunteers, Visitors and Contractors

TAEP ensures that:

- all regular volunteers are subject to appropriate DBS checks
- visitors sign in, issued with an appropriate coloured lanyard depending on their safeguarding checks, wear identification and are supervised where required
- contractors and external providers provide assurance of safeguarding compliance

## Single Central Record (SCR)

TAEP maintains a **Single Central Record (SCR)** in accordance with KCSIE 2025 and statutory requirements.

### SCR Content

The SCR records the following checks for all relevant staff:

- identity
- enhanced DBS (including barred list check where applicable)
- prohibition from teaching
- section 128 checks (where applicable)
- right to work in the UK

- qualifications (where required)
- start date and confirmation of checks

The SCR also includes evidence of check for:

- supply staff
- volunteers (where appropriate)
- External agencies
- Contractors
- governors / management committee members

### **SCR Management and Oversight**

- The SCR is maintained by the School Business Manager / designated safeguarding staff
- It is regularly reviewed and quality assured by the Executive Headteacher and safeguarding governor
- Any gaps or discrepancies are addressed immediately
- Termly safeguarding audits include scrutiny of the SCR

### **Ongoing Vigilance**

Safer recruitment is not a one-off process. TAEP ensures:

- ongoing staff supervision and safeguarding culture
- clear staff code of conduct expectations
- low-level concerns are recorded and reviewed
- safeguarding remains a continuous priority

### **Compliance Statement**

This appendix has regard to:

- **Keeping Children Safe in Education (2025)** – Part 3 (Safer Recruitment)
- **Education Act 2002 (Section 175)**
- **The School Staffing (England) Regulations 2009**

**TAEP ensures all recruitment follows safer recruitment principles.**





TAEP follows safer recruitment procedures in line with KCSIE. No staff member will commence unsupervised work without appropriate safeguarding clearance. TAEP **maintains** an SCR in line with KCSIE and reviews it regularly. Central Record (SCR) in line with KCSIE Part Three. All required pre-employment checks are completed before staff start work and are regularly reviewed by leaders and the safeguarding governor



## Safer Recruitment Checklist

ALL CHECKS MUST BE COMPLETED AND RECORDED ON THE SINGLE CENTRAL RECORD BEFORE START DATE.

**⚠ DO NOT START WORK UNLESS ALL REQUIRED CHECKS ARE SATISFACTORILY COMPLETED.**

Requirement	Evidence (✓)	Date	Checked by
✓ Application form completed	✓		
✓ Identity verified			
✓ Enhanced DBS check			
✓ Barred list check			
✓ Right to work check			
✓ Qualifications verified			
✓ References obtained (2)			
✓ Online search completed			
✓ Prohibition check (if applicable)			
✓ Section 128 check (leaders)			

✓ All required checks must be completed and recorded on the Single Central Record before start date.



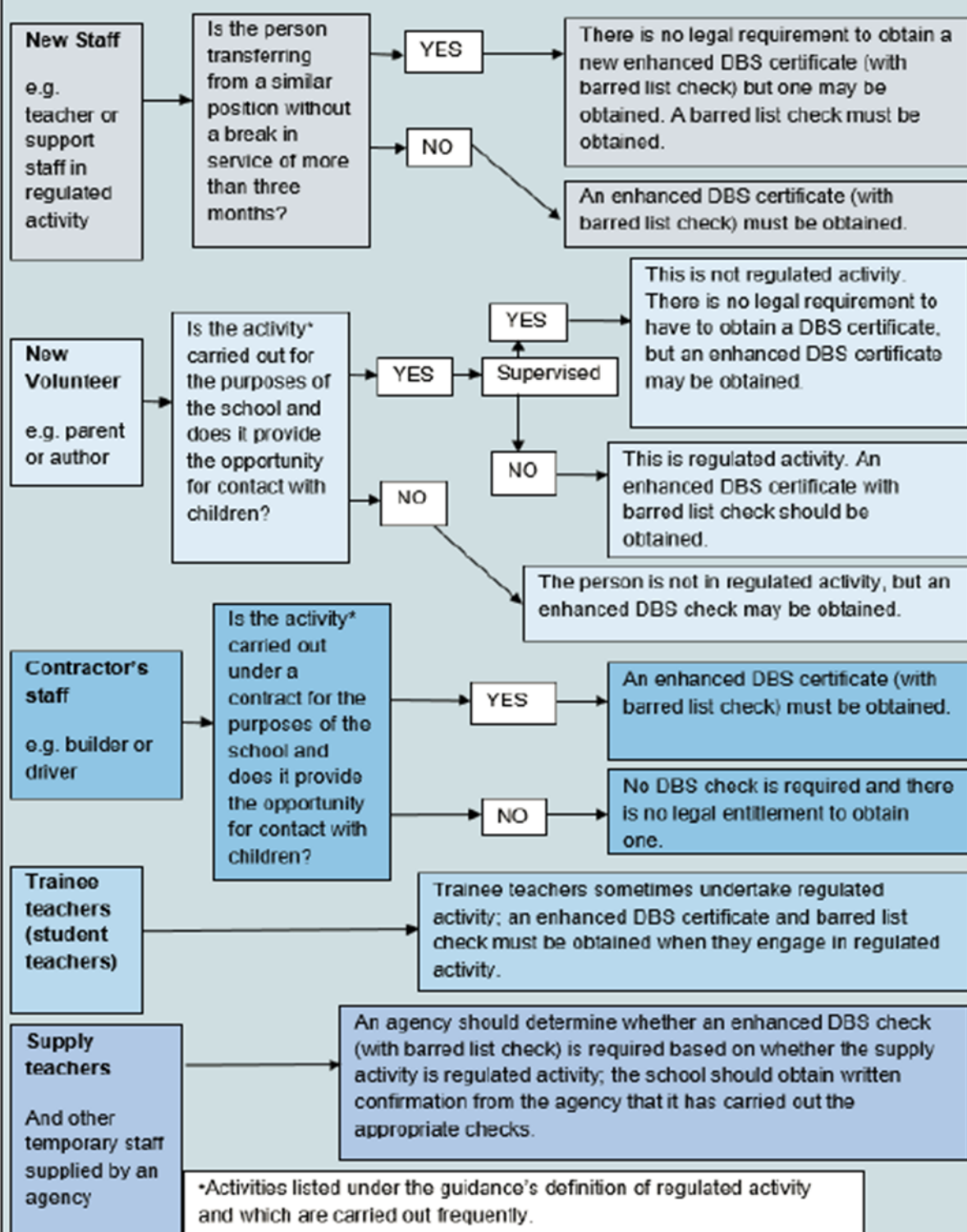
TAEP follows safer recruitment procedures in line with KCSIE.

No staff member will commence unsupervised work without appropriate safeguarding clearance.



✓ Compliant

**FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS**



**Appendix 3 – PRU Contextual Safeguarding Risk Matrix (County Lines & Exploitation)**

Trafford Alternative Education Provision (TAEP) recognises that pupils may be vulnerable to **criminal exploitation, county lines activity, and serious youth violence**. The following matrix supports staff in identifying, assessing, and responding to risk.

**Risk Indicators Matrix**

Area of Risk	Indicators / Warning Signs	Level of Concern	Staff Response (Immediate Action)	DSL / Safeguarding Action
<b>Missing Episodes / CME</b>	Repeated absence, missing during the day, not where expected, patterns of going missing after school	Medium → High	Report immediately to office/DSL, record on CPOMS same day	Analyse patterns, contact parents/carers, refer to Attendance & First Response if threshold met
<b>Unexplained Money / Items</b>	New clothing, phones, trainers, cash without explanation	Medium	Record concern on CPOMS, speak to DSL	Build wider picture, consider exploitation indicators, multi-agency discussion
<b>Peer / Adult Associations</b>	Associating with older individuals, known risk peers, gang-affiliated groups	Medium → High	Report to DSL, monitor peer interactions	Intelligence sharing with police/social care, risk assessment
<b>Mobile Phone / Online Activity</b>	Multiple phones, secrecy, excessive messaging, use of slang linked to county lines	Medium	Log concern, do not confiscate without following policy	Consider exploitation risk, filtering & monitoring review, possible referral
<b>Travel Patterns</b>	Travelling outside local area without explanation, taxi use, train routes, being dropped off by unknown adults	High	Report immediately to DSL	Immediate safeguarding assessment, possible referral to First Response/police
<b>Behaviour Changes</b>	Sudden aggression, withdrawal, anxiety, fatigue, disengagement	Medium	Record on CPOMS, inform DSL	Consider trauma/exploitation link, pastoral intervention, early help or referral
<b>Carrying Items / Risk of Harm</b>	Possession of unknown packages, weapons, or suspicious items	High	Follow behaviour/search policy, inform DSL immediately	Immediate safeguarding response, police involvement if necessary
<b>Disclosure / Intelligence</b>	Direct or indirect disclosure of	High	Listen, reassure, do not promise	Immediate referral to First Response,

Area of Risk	Indicators / Warning Signs	Level of Concern	Staff Response (Immediate Action)	DSL / Safeguarding Action
	exploitation, threats, coercion, debt		confidentiality, report immediately	strategy discussion, multi-agency response
<b>Online Exploitation / Grooming</b>	Contact with unknown adults, coercion via social media, sextortion risk	Medium → High	Record and report to DSL	Online safety intervention, possible CEOP referral

### Risk Level Guidance

- **Low Concern** → Monitor, record, build awareness
- **Medium Concern** → Report to DSL, increased monitoring, early help consideration
- **High Concern** → Immediate DSL action, referral to **Trafford First Response**, possible police involvement

### Key Principles for Staff

- All concerns must be recorded on **CPOMS on the same day**
- **Do not investigate** – pass concerns to the DSL
- Maintain **professional curiosity** – small indicators may form part of a wider risk
- Always consider: Is this behaviour linked to exploitation or harm?

### PRU Safeguarding Expectation

Due to the heightened vulnerability of pupils in alternative provision, TAEP adopts a proactive and intelligence-led approach to identifying exploitation risks. Patterns of behaviour, attendance, and peer association are treated as safeguarding indicators and responded to through robust multi-agency working.

This matrix is reviewed regularly by the DSL and safeguarding governor to ensure it reflects current local risks identified by Trafford Safeguarding Children Partnership and Greater Manchester Police

Indicator	Examples	TAEP Response
Missing episodes	Frequent unexplained absence	Immediate DSL referral
Unexplained money/items	Phones, cash, clothing	Record on CPOMS
Change in peer group	Older or unknown associates	Monitor and escalate
Increased secrecy	Avoiding staff / hiding activity	Safeguarding conversation
Travel outside area	Regular unexplained journeys	Consider police referral

Indicator	Examples	TAEP Response
Substance misuse	Drugs, alcohol involvement	Multi-agency support
Aggressive behaviour	Increased risk-taking	Behaviour + safeguarding response
Use of multiple phones	Burner phones	Report to DSL

**Key Principle:**

Any indicator may suggest exploitation and must be treated as a safeguarding concern.

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## Appendix 4 – Low-Level Concerns

TAEP operates a low-level concerns approach in line with KCSIE 2025. All concerns about adults working with children, including those that do not meet the harm threshold, are recorded, reviewed and addressed to maintain a safe culture

- All staff must report any concern, no matter how small, about the behaviour of an adult working with children
- Concerns are reported immediately to the Executive Headteacher (or Chair of Management Committee if required)
- All concerns are recorded securely and reviewed to identify patterns or emerging risk
- Where a concern meets the harm threshold, it will be referred to the Local Authority Designated Officer (LADO) without delay
- Staff are supported to report concerns without fear of reprisal, in line with whistleblowing procedure

### Recording and Retaining Low-Level Concerns

#### Low-Level Concerns – Definition

A low-level concern is any concern—no matter how small—that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, does not meet the threshold for LADO referral, but causes a sense of unease about behaviour toward a child.

#### Recording Low-Level Concerns

All low-level concerns must be reported to the Executive Headteacher immediately and recorded on the same day.

Records must include:

- Date and time
- Name/role of reporter
- Factual description
- Context and circumstances
- Adult(s) involved
- Actions taken
- Rationale for decisions
- Follow-up actions

#### Retention of Low-Level Concerns (KCSIE 2025)

1. Substantiated concerns: kept on personnel file for employment duration + minimum 6 years.
2. Unfounded/unsubstantiated/appropriate conduct concerns kept in low-level concerns file for at least duration of employment.
3. Emerging patterns: reviewed and escalated to LADO if threshold met.

**Storage & Access**

Confidential, secure, and accessible only to Executive Headteacher, DSL (where appropriate), HR or Chair of Management Committee (if concern relates to Headteacher).

**Sharing of Records**

Not routinely shared with new employers unless safeguarding thresholds require it.

**Annual Review**

Termly review of patterns, oversight by Safeguarding Governor and DSL.

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## Appendix 5 – CPOMS Recording Guidance

### What is CPOMS?

CPOMS is the school's secure system for recording safeguarding, behaviour and wellbeing concerns. All staff must record concerns promptly.

### When to Record

Log on CPOMS the same day (immediately if urgent) if:

- A student discloses information
- You witness or are told about a concern
- A student leaves site / goes missing
- There are safeguarding, attendance or wellbeing concerns
- Something doesn't feel right

 If in doubt – record it

### How to Record (3 Steps)

#### **1** Add Incident

- Log
- → Click  Add Incident → Select student

#### **2** Write Your Record

- ✓ Facts only (no opinions)
- ✓ Include: who, what, when, where
- ✓ Use student's words in quotes
- ✓ Record actions taken


Example:

10:15am, Room 3 – Sam said, 'I don't feel safe at home.' Appeared upset. DSL informed immediately.

### **3 Alert & Save**

- Alert DSL/DDSL (mandatory for safeguarding)
- Click  Save

### Immediate Risk

- Speak to DSL/DDSL immediately
- Then log on CPOMS  
 Do not delay action

### Recording Standards

#### **Entries must be:**

- ✓ Timely
- ✓ Factual
- ✓ Clear
- ✓ Professional

#### **Do not:**

- ✗ Use opinion or assumptions
- ✗ Delay recording
- ✗ Investigate independently

#### **Include:**

- Date, time, location
- Names of pupils involved
- Exact words (where possible)
- Actions taken

### TAEP Key Reminders

**Any pupil who leaves the site without permission or is not where expected is treated as a safeguarding incident. Immediate actions include site search, parent contact, DSL escalation and, where risk is identified, referral to police and/or Children's Social Care.**

- **Record missing / walkouts immediately**
- **Log patterns of concern (attendance, behaviour, mood)**
- **Include relevant context (e.g. vulnerability, ESBNA)**

#### **🔒 Confidentiality**

- **CPOMS is confidential**
- **Do not share information outside appropriate staff**

#### **DSL/ DDSL Responsibilities:**

- **Review all entries**
- **Maintain chronologies**
- **Identify patterns**
- **Share with agencies**

# CPOMS

– Safeguarding and Pastoral Monitoring System

## What to Report on CPOMS?



Record any concerns as soon as possible on CPOMS.

- Be factual and detailed in your report.
- Include any relevant quotes and information.
- Select the appropriate alert level for your concern.

DSLs and Pastoral Leaders will follow up and take appropriate action.



If in doubt, speak to a DSL or Pastoral Leader.

**Appendix 6 – Safeguarding Governor Audit**

**Termly Safeguarding Audit**

Area	RAG Rating	Evidence	Action Required
Safeguarding Policy updated			
DSL training up to date			
Staff training completed			
CPOMS monitoring effective			
Safer recruitment compliant			
Filtering & monitoring reviewed			
Attendance monitoring			
Contextual safeguarding risks identified			

**Outcome**

- Strengths:
- Areas for development:
- Actions agreed:

## Appendix 7- Trafford Level of Needs and Thresholds

Level		Description: At this level the child or family...	What Needs to happen next?	Assessment Required Referral Process
Universal	Level 1	...is thriving without requirement for additional support and all needs are being met by universal services, for example Health Visitor, School Nurse, Dentist or School.	Ensure that all families are aware of the Family Information Service and are registered with Education and Training providers, Health Services and Community Groups.	Use of Trafford Directory
Early Help / Prevention	Level 2	...may require or would benefit from additional input or support from an agency/agencies.	When a child begins to display emerging needs requiring additional support, services already working with the child should support the family by undertaking an assessment and develop an Outcome Plan. This will identify support from within the local community or a specific intervention.	Assessment required for example Early Help Assessment. Referral Form for specific agency
Intensive Family Support	Level 3	...are experiencing multiple and/or complex needs. The family is struggling to effect change without the support and intervention of services. There is a need for a greater level of support including regular home visits.	If a child or family's issues are more complex and cannot be managed within the community and the family consent, additional support can be sourced through Intensive Family Support. This would include support in the home, pulling in multi-agency partners who are, or need to be, involved with the child and family in order to achieve a positive outcome	Early Help Assessment; which will be required when referring for Intensive Family Support.
Child In Need	Level 4	...is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services. The child's health or development is likely to be significantly impaired, or further impaired without the provision of additional services; or the child is disabled.	As the child and family's issues continue to escalate or if interventions are not working and it is felt that the needs cannot be met without the intervention of social care.  There should be a sound record of interventions and support offered previously by services to highlight why social intervention is required.	Child and Family Assessment. Referring agency to complete referral.
Child Protection	Level 5	...is at risk of or suffering significant harm and is in need of help and protection. Has a high level of unmet and complex needs requiring statutory interventions.	These children require immediate social care intervention to ensure continued safety and positive development and to prevent significant harm. This may lead to them becoming subject to a Multi-Agency Child Protection (CP) Plan or becoming Looked After. Any child subject to a CP Plan or Looked After will have social care intervention already in place.	Child and Family Assessment. Referring agency to complete referral.

**Appendix 8- Operation Encompass Flowchart**



## Appendix 9– Summary of Working together to Safeguard Children 2026

Working Together to Safeguard Children (2026) is the latest statutory guidance setting national expectations for how organisations and agencies work together to safeguard and promote the welfare of children. Published in March 2026, it replaces previous versions and significantly strengthens multi-agency child protection practice.

### 1. Stronger Multi-Agency Accountability

Clearer expectations for safeguarding partners—local authorities, police and health—to collaborate effectively.

Annual safeguarding reports must demonstrate improving impact on children and families, not just compliance. [gov.uk]

Greater emphasis on shared responsibility across education, health, social care and voluntary sector partners. [independen...ervice.org]

### 2. Early Help and the Family Help Model

Introduction of Family Help, combining targeted early help and Section 17 support into a unified offer.

Families should receive consistent practitioner relationships and multi-disciplinary support.

Designed to reduce fragmentation between early help and statutory child-in-need processes. [devonscp.org.uk]

### 3. Inclusive, Anti-Discriminatory Practice

Reinforced requirement for anti-racist, anti-discriminatory and culturally informed practice.

Practitioners must understand how discrimination and racism can affect engagement, trust and outcomes.

Leaders must embed inclusive cultures across all safeguarding practice. [gov.uk]

#### 4. Stronger Guidance on Specific Harms

Working Together (2026) strengthens expectations around:

child sexual abuse (including hidden harms and intra-familial abuse);

domestic abuse;

harmful sexual behaviour;

exploitation (criminal, sexual and online);

contextual safeguarding and harm outside the home;

risks to babies and unborn children. [gov.uk]

#### 5. Online Harms and Technology-Enabled Risks

Updated references to online grooming, deepfakes, group-based exploitation and harmful content.

Emphasis on coordinated responses across agencies. [gov.uk]

## 6. Multi-Agency Child Protection Processes

Stronger expectations for Section 47 enquiries.

High-quality multi-agency strategy discussions required, with direct work with the child emphasised.

Assessments must consider multiple and overlapping risks. [gov.uk]

## 7. Roles and Responsibilities Clarified

Clearer definitions of responsibilities across safeguarding partners, social care leaders, education settings and all practitioners.

Reinforcement that safeguarding applies to all children: those with birth families, in kinship care, adopted, looked-after or unborn children with identified vulnerabilities. [gov.uk]

## Appendix 10– Non School Alternative Provision – Joint Visit Feedback

TAEP maintains robust safeguarding oversight of all alternative provision placements, including pre-placement checks, written safeguarding assurances, regular communication and joint monitoring visits with the local authority where appropriate. Quality is assured through pre-placement checks, regular visits (including joint visits with Trafford Local Authority), and monitoring of attendance, behaviour and progress.

All providers follow Keeping Children Safe in Education and report safeguarding concerns immediately to TAEP, which retains overall safeguarding responsibility.

TAEP works in partnership with Trafford Local Authority to ensure provision is appropriate and meets statutory requirements.

The Executive Headteacher, DSL and Management Committee maintain oversight, and any concerns are acted on immediately, including ending placements where necessary.



### **Non School Alternative Provision – Joint Visit Feedback**

This review is based on [Non-school alternative provision: voluntary national standards](#) (August 2025) as well as local standards.

It should be noted that any urgent concerns (safeguarding/health and safety) identified on a visit will be escalated through appropriate processes immediately. Feedback from visits will be shared with schools via Trafford Alternative Provision Working Group and with Local Authority Officers through Trafford Alternative Provision Steering Group. Feedback forms will be made available to all relevant parties through Placements Northwest.

**Date of visit:**

**Visit conducted by:**

<b>Name of Alternative Provision</b>	
<b>Name of person responsible for leadership of provision</b>	
<b>Name of other staff in a leadership role</b>	

<b>Provision capacity</b>		<b>Number of pupils in the Provision</b>	
<b>Pupils with EHC Plans (please outline timetable for each child)</b>		<b>Pupils under EHCNA</b>	
<b>Pupils on SEN Support</b>		<b>CLA (please outline timetable for each child)</b>	

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Demographics of learners			
Male		Female	
KS1		KS2	
KS3		KS4	
Communication & interaction		Cognition and Learning	
Social, emotional and mental health		Physical and/or sensory	

### Overview of provision

	What age range does the provision cover?
Q1	What type of SEND need does the provision support? What profile of child would be suitable for this provision?

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Q2	How is the day structured for children accessing the provision? Please include details of start/finish times and transport arrangements (if applicable)
Q3	What is the main structure and focus of the provision? For example, group / class sizes, number of adults / ratios, different approaches to different ages (if applicable)

Q4	What alternative or additional curriculum offer is provided by the provision? What external qualifications are available?
Q5	What are is the approach to discipline / behaviour? How many restrictive physical intervention incidents have taken place in the last year?
Q6	How do you communicate and share information with commissioners? E.g. sharing attendance, achievements, progress and other updates.

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### Safeguarding and the welfare of children

Standard	Current Position	Future Actions
<p><b>1.1 All staff, including proprietors, should undergo recruitment checks including an enhanced Disclosure and Barring Service (DBS) with barred list check where appropriate. Checks should be recorded on a single central record and persons who fail to meet those checks should not be employed</b></p> <p>When recruiting staff, proprietors should ensure that all offers of appointment are conditional and that the following pre-employment checks are completed before a person's appointment to a role. Proprietors should:</p> <ul style="list-style-type: none"> <li>• verify the candidate's identity.</li> <li>• verify the candidate's mental and physical medical fitness to carry out their work responsibilities</li> <li>• verify the candidate's professional qualifications, as appropriate (though teaching staff are not required to have qualified teacher status (QTS), proprietors should be satisfied they have necessary qualifications and experience of working with children)</li> <li>• verify the candidate's right to work in the UK.</li> </ul>		

<ul style="list-style-type: none"> <li>• verify that the candidate is not subject to a section 128 direction by the Secretary of State</li> <li>• verify that the candidate is not working in contravention of a teaching prohibition order (or an interim prohibition order or a direction made under section 142 of the Education Act 2002)</li> </ul> <p>Providers should maintain a single central record of the above checks made on proprietors, staff, supply staff and any others engaged in regulated activity. This can be kept in paper or electronic form. Appropriate levels of security protection procedures should be in place to safeguard their systems, staff, and children.</p>		
<p><b>1.2 Appropriate policies and procedures are in place to safeguard and promote the welfare of all children attending the provision</b></p> <p>Providers should have policies and procedures in place which allow appropriate and timely actions to be taken to safeguard and promote children’s welfare. These policies should be written in plain English so that they can be easily understood, well organised, and reflective of the nature of the provision. The policies should include clear instructions on the actions to be taken and include appropriate contacts for external referrals. Proprietors should ensure that all policies are reviewed annually, and that they are accessible to alternative provision commissioners, parents and the wider public. All providers should have:</p> <ul style="list-style-type: none"> <li>• a child protection policy including sections relating to child-on-child abuse, online safeguarding and how to escalate child safeguarding concerns</li> <li>• a behaviour policy for children attending the setting including measures to prevent bullying (such as cyberbullying and prejudice based or discriminatory bullying), and the policy on the use of reasonable force</li> <li>• a staff behaviour policy including processes for dealing with low level concerns, allegations against staff and whistleblowing procedures</li> </ul> <p>To support the development of these policies, providers should refer to the government’s statutory guidance on safeguarding children: Keeping children safe in education and Working together to safeguard children which provides multi-agency guidance that applies to all organisations and agencies who have functions relating to children. Providers will probably need to develop other policies to ensure compliance with other relevant legal duties such as,</p>		

<p>for example, data protection laws. It is important that proprietors are aware that, among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulations (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.</p>		
<p><b>1.3 Robust procedures are in place outlining how to respond when a safeguarding or welfare concern arises</b></p> <p>Providers play a vital role in sharing and contributing to key information about safeguarding. This can include concerns about abuse, neglect, exploitation, and wider social and environmental factors, and about the places, spaces and relationships outside the family home in which harm can occur, including online and extra-familial contexts. The child protection policy should set out how staff should respond when faced with concerns about a child's welfare. This should include instructions on the processes for sharing all relevant information with the named safeguarding lead immediately upon becoming aware of a concern, so that the safeguarding lead can decide on the next steps. A provider should then take one or more appropriate actions depending on their assessment of the concerns which factor in any risks that may exist to a child, other children or staff. They should begin by sharing and discussing the concern with the commissioning school's designated safeguarding lead and/or the local authority's commissioning lead. If it is agreed that the setting is best placed to take forward the safeguarding referral, for example, because the provider has built a strong trust with the child, then this should be done in a timely fashion with the commissioner routinely updated. The options should include:</p> <ul style="list-style-type: none"> <li>• managing any support for the child internally via their own pastoral support processes</li> <li>• undertaking an early help assessment with the assistance of the local authority</li> <li>• making a referral to statutory services (local authority children's social care) if there are concerns about a child's welfare. If a child is not at immediate risk of significant harm, staff must still report concerns to the DSL without delay so that appropriate action, including Early Help or referral, can be considered.</li> </ul>		

<p>This should be done immediately if there is a concern that the child is suffering significant harm or is likely to do so. If there are concerns that a child is at immediate risk of harm, it may be appropriate to call the police. Children, parents or carers, staff or other concerned parties should also be made aware of other routes available, including going to the commissioner or the local authority's children's social care team, if they have reason to believe a concern is not being, or will not be, acted on. Policies should allow for concerns to be raised anonymously. However, written records must be kept of every concern that has been raised, even when concerns were resolved or no action was taken. All concerns should be shared with school or local authority commissioners, the child's family, and any other appropriate local or national authorities. Information of a sensitive or personal nature related to these policies such as pupil files, individual risk assessments or complaints should be safe and secure.</p>		
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<p><b>1.3 All staff should be familiar with the provider’s arrangements to safeguard and promote the welfare of children</b></p> <p>Providers will need to ensure that all members of staff understand and know how to implement the policies and procedures set out in standard 1.2:</p> <ul style="list-style-type: none"> <li>• all permanent staff should be made aware of these arrangements when appointed to their roles</li> <li>• all permanent staff should be aware of the referrals process including how and when to engage the provider’s child safeguarding lead, as set out in standards 1.3 and 1.5</li> <li>• all permanent staff should undertake child protection training on an annual basis</li> <li>• there should be a proportionate, risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.</li> </ul>		
<p><b>1.4 Providers should have a named child safeguarding lead who has received appropriate, documented training</b></p> <p>Providers should have a named child safeguarding lead to pursue concerns and protect children. The role of the child safeguarding lead can be held by any member of a provider’s teaching or leadership staff. The role carries a significant level of responsibility, as they should lead on all safeguarding and child protection duties at the provision. This includes:</p> <ul style="list-style-type: none"> <li>• working with designated safeguarding leads in commissioning schools, and with relevant members in local authority commissioning teams to understand all relevant safeguarding information and if necessary, conduct risk assessments before each child starts their placement</li> <li>• recording of safeguarding incidents and concerns and sharing these concerns with school or local authority commissioners (and other relevant statutory bodies as necessary) when they arise</li> <li>• working with the case manager (the person leading any investigations) and the local authority designated officer (LADO) responsible for child safeguarding, where identified</li> </ul>		

<ul style="list-style-type: none"> <li>• where a safeguarding concern involves the commissioner, or there is a situation where there is a conflict of interest in reporting the matter to the commissioner or another member of staff, the safeguarding lead should share the concerns with the LADO</li> <li>• when it is agreed with the commissioner or LADO that it is more appropriate for the setting to take forward safeguarding actions, making referrals to and working in partnership with local safeguarding partners to investigate safeguarding complaints, including complaints involving proprietors and staff</li> <li>• taking steps to support other staff and advise them on child welfare, safeguarding and child protection matters and ensure that other staff understand the arrangements and their role within that. The safeguarding lead will also be responsible for arranging additional training for other staff where necessary</li> <li>• taking part in discussions and meetings with school and local authority commissioners, local safeguarding partners and other stakeholders and contributing to the assessment of children attending the provision</li> <li>• drafting and reviewing the provider's child protection and other safeguarding policies and procedures • familiarising themselves with all relevant government guidance on safeguarding children, including the statutory guidance on Keeping children safe in education and Working together to safeguard children</li> <li>• understanding the risks of extremism and radicalisation and accessing the government's prevent duty training The named child safeguarding lead should undergo training to provide them with the knowledge and skills required to carry out the role and should renew their training at least every two years. It is considered best practice where possible for providers to have a named deputy safeguarding lead to supplement the primary safeguarding lead in case of absence. The deputy safeguarding lead should receive the same training as the primary safeguarding lead.</li> </ul>		
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**1.5 Site access should be restricted to children receiving provision, the provider's own staff, and supervised visitors**

Non-school alternative provision can take place in a wide variety of settings or environments, including places where children may encounter individuals who are not staff or who have not received any safeguarding checks. As a result, providers should take the following steps. Where provision takes place at a site or across sites operated exclusively by a provider, access to the site should be restricted to children receiving the provision, the provider's own staff, and supervised visitors. This can be supported by the following measures:

- controlled access to the site(s)
- sign in procedures
- supervision of children at arrival, departure, and social times
- visitors' procedures
- contractors have appropriate checks and/or supervision
- shared site arrangements if appropriate Where a site is shared with the public, or where the provision takes place outside, in the community (for example, in a library or council office), or at home, risk assessments must be undertaken which consider the needs of individual children, and any local factors relating to the location of the provision. When the provision takes place in a non-secure 12 environment, except in circumstances where privacy is needed, children should be supervised by a member of staff who has passed all recruitment checks.

## Health and safety

### **2.1 An appropriate health and safety policy is in place and implemented effectively**

Providers must comply with all relevant health and safety legal obligations. To achieve this, they must have a health and safety policy to help them consider and manage any risks in relation to all activities on- or off-site which could place the health and safety of children at risk. This should include:

- a general statement of the policy
- delegation of tasks: a summary of all staff members with delegated health and safety responsibilities, which should be updated whenever there are changes to the responsibilities
- arrangements for risk assessments, including:
  - o environmental or site assessments or assessment of specialist equipment
- assessments relating to individual children with additional needs, lone working arrangements, and individual activities that are carried out by children
- arrangements to support children with medical conditions including the administration of medicines • practical control measures to reduce risk
- the process for recording and reporting injuries or accidents
- the process for establishing, monitoring and reviewing its policies and procedures to ensure they meet established and revised health and safety requirements The health and safety policy should also include consideration of children's individual health needs. If a child requires supervision when taking medication while attending a setting, the commissioning agreement and individual healthcare plan should include written permission from their parents or carers and their headteacher or local authority officer for their medication to be administered by a member of staff, or self-administered by the child. Effective implementation of a health and safety policy involves proactively identifying potential health and safety risks and taking swift, preventative measures to address them in accordance with the policy. To support effective implementation, providers must

<p>ensure that staff receive information, instruction, and training about health and safety. This should include:</p> <ul style="list-style-type: none"> <li>• how to assess risks specific for their job. Risk assessments should be undertaken by staff members with sufficient training, experience or knowledge. Providers have a duty to assess risk, but all staff members should be consulted about risks which affect them</li> <li>• meeting their roles and responsibilities identified within the health and safety policy</li> </ul> <p>Providers can do this in different ways depending on individual or specific need relative to their setting. For example, providing staff with written guidance may be appropriate in some cases, while attending a training course may be more appropriate in others. Staff whose work involves a greater element of risk will need extra or specific training.</p>		
<p><b>2.2 First aid equipment and/or facilities are readily available and there are arrangements for access to a qualified first aider</b></p> <p>Providers should ensure that first aid is administered in a timely and competent manner by suitably trained staff. This should be assisted by the drawing up and effective implementation of a written first aid policy. To support this, providers should have, on each site:</p> <ul style="list-style-type: none"> <li>• a designated, qualified first aider(s) to take charge of first aid arrangements</li> <li>• a suitable first aid container stocked in accordance with the findings of the first aid needs assessment and holding at least the minimum requirements suggested by HSE</li> <li>• information for staff detailing the location of equipment, facilities, and personnel</li> </ul> <p>To qualify as a first aider, an individual should undergo appropriate training delivered by a competent training provider and hold a valid first aid certificate. Some provision may take place in the community (for example in a library or council office), or in a family home or another private residence. In such instances, the provider's first aid needs assessment may identify that a designated first aider is not required. In these circumstances, the provider should agree with the host on a designated person with responsibility for any first aid arrangements, including calling the emergency services, when required. Arrangements should be made for the designated person to be available to undertake these duties at all times. HSE first aid at work guidance is available. In developing an approach to first aid, providers may want to refer to DfE's guidance on first aid in schools.</p>		

<p><b>2.3 A system should be in place and in use for recording and reporting health and safety and first aid incidents</b></p> <p>The reporting of injuries, diseases and dangerous occurrences regulations (RIDDOR6) require that all workplaces, including providers of non-school alternative provision, must record and report certain work-related injuries incurred by a child or a member of staff. HSE explain when, how, and where to report incidents in their education information sheet: incident reporting in schools. While the document specifically references schools, the information is applicable to non-school alternative provision settings. Providers should keep a written record of all incidents and report them to relevant parties or authorities. Minor incidents should be reported to commissioners and parents, but significant or major incidents or emergencies should also be reported to HSE. Where an incident takes place in the home or in the community, providers should make an assessment of the safety of the child and update the risk assessment if required (for example by making changes to travel arrangements).</p>		
<p><b>2.4 All specialist equipment used by the provider should have undergone relevant inspection and safety checks consistent with industry standards</b></p> <p>Providers should ensure that any specialist equipment is safe when children are using it, or if they are present when others are using it. Competent staff with the appropriate qualifications, skills or training should carry out regular inspections of this equipment, in line with the provider's own risk assessments and in accordance with industry standards. Providers may also wish to refer to HSE's guidance on risk assessments; its industry specific guidance; and its guidance on equipment and machinery.</p>		
<p><b>2.5 Staff should hold appropriate qualifications and be suitably trained in the use of specialised equipment</b></p> <p>All staff who are responsible for instructing or supervising children should possess appropriate qualifications, training, and experience in operating any specialist equipment. The training and experience should include supervising or instructing children in the use of this equipment where appropriate.</p>		

**2.6 An appropriate fire safety policy should be in place**

The government has produced guidance for all employers, head teachers, governors, vice-chancellors, occupiers, and owners of premises where the main use of the building (or part of the building) is for educational purposes. DfE's guidance on fire safety risk assessments in educational premises sets out the key requirements that providers must meet. While not specified by name, non-school alternative provision settings must comply with these requirements. As set out in the guidance providers should:

- ensure procedures are in place to reduce the likelihood of fire
- maintain fire detection and alarm systems
- ensure that staff and children are familiar with the emergency evacuation procedures

If the provision is taking place in a public place (for example, a library or council office), the provider should ensure that a fire safety management policy and evacuation plan is included in the health and safety policy of the organisation hosting the activity<sup>7</sup>. In addition, providers must:

<sup>7</sup>The Regulatory Reform (Fire Safety) Order 2005 17

- undertake a fire risk assessment (as outlined in government guidance on what a fire risk assessment should cover)
- consider the needs of all individuals who may be at risk
- reduce the risk of fire as much as is reasonably possible
- provide general fire precautions to mitigate against any possible risks
- take further measures to make sure there is adequate protection when using or storing flammable or explosive materials
- create an evacuation plan, tailored to the premises, to respond to any emergencies (including clearly marked escape routes and exits, and a safe meeting point)
- ensure that all fire-risk assessment findings are recorded and retained

Children should be familiarised with the fire safety plan through planned evacuation drills and staff should consider whether individual risk assessments are required for children with individual needs. The fire risk assessment must be kept up to date and should be reviewed whenever a change at the setting may require a new assessment. Changes may include, for example, increased numbers of staff or children, admission of children with specific needs, or changes in the design of the premises in which the provision takes place.

**Admissions, support and guidance**

<p><b>3.1 Admissions policies and referral processes should be clearly documented and well supported</b></p> <p>Providers should have fair, clear and transparent admissions policies and referral processes in place. They should include an overview of the provision, its aims and objectives, examples of the education provision or support being offered and other 19 information relevant to deciding whether settings are suitable to children’s individual needs. Parents and commissioners should be provided with a named contact in the setting to support the admissions process. While providers have autonomy over their own admissions arrangements, they must not, under the Equality Act 2010, discriminate on the grounds of disability or other criteria such as race, religion, or gender. Admissions policies must consider reasonable adjustments for children with disabilities.</p>		
<p><b>3.2 Providers should maintain records, including information supplied by commissioners, for all children placed in their settings</b></p> <p>Providers should work with commissioners to ensure that both parties have access to key relevant information to help understand and meet children’s needs. Information sharing will help commissioners and providers to work together to agree on the support needed, and on arrangements when concerns arise, for example around safeguarding or attendance. The relevant information that should be provided by commissioners when placements commence includes: • emergency contact details • previous school admissions and attendance history • academic performance reports • personal education plans, EHC plans, individual healthcare plans, or other learning plans • records of additional health needs • any records relating to exclusions, including behaviour reports and risk assessments • any information pertinent to child safeguarding</p>		
<p><b>3.3 Providers should have an induction process to help children to understand the intended outcomes of their placements and their setting’s safeguarding and health and safety policies</b></p> <p>All non-school alternative provision settings should be inclusive and welcoming, so that children feel welcome and supported when starting their placements. They should also know what they should do if they have any concerns or do not feel safe, and understand how the placement will help their learning journey, and the learning outcomes they will be expected to achieve. All providers should have an induction process, which should be outlined in a written integration or</p>		

<p>induction policy, and which should be shared with children. Providers should use this as a means of building on the information provided by commissioners and to gain further understanding of children's individual education and welfare needs. To support this, setting staff should conduct and produce:</p> <ul style="list-style-type: none"> <li>• baseline evaluations, including those to understand children's individual needs</li> <li>• individual learning plans which should include timetables together with attendance and behaviour expectations</li> <li>• a risk assessment if the information from placement commissioners identifies significant safeguarding concerns</li> </ul> <p>Providers should ensure that commissioners and parents or carers also receive information about the induction process and the child's educational offer so they can support children's learning.</p>		
<p><b>3.4 Providers should record children's attendance for each session and share information promptly with commissioners. Processes should be in place for checking on the health and welfare of absent children, and to agree strategies to improve attendance</b></p> <p>Providers should record attendance or absence for each session and report that information to the commissioners as soon as is possible, ideally within 30 minutes of the start of the session. Recording and reviewing attendance data can help shape the setting's strategy for supporting children's regular attendance. Timely sharing of information also supports school commissioners to fulfil their legal duties in completing school attendance registers. Absences should be followed up urgently to ascertain the reason, identify whether the absence is approved or not and where necessary ensure proper safeguarding action is taken. Providers should have agreements in place with commissioners to decide who is best placed to take forward any actions. When it has been agreed that a provider follows up an absence, it should contact the child's parents or carers and where necessary and if agreed with the commissioner, other professionals who are working with the child and their family, to understand why and when the child will return. Providers should also collaborate with the commissioner, the child and their parents to ensure that any provider level barriers to non-attendance are addressed. Where any barriers fall outside of the provider's control, all partners should work together to support the child and their parents to access any support they may need. Providers should exchange information with commissioners to inform and support the respective settings' attendance management approach. Attendance should be discussed with</p>		

<p>commissioners at least every six weeks, and if required, different levels or types of support proposed.</p>		
<p><b>3.5 All providers should have a strategy to support good behaviour for learning, to record children’s behaviour and progress, and to share information about behaviour routinely with commissioners and parents</b>  As specified in standard 1.2, all providers should have a behaviour policy. Staff should put their policy into practice from day to day and in a consistent manner. Support should be provided to all learners to help them meet behaviour expectations, with reasonable adjustments and adaptations in place for children who have specific identified needs. Staff should be provided with regular training to enable the management of children’s behaviour, including de-escalation of confrontations or potentially challenging behaviour, and the avoidance of physical restraint and other restrictive interventions. Providers should maintain up to date records of children’s behaviour. Significant behaviour incidents should be reported to commissioners and parents promptly, ideally on the same day that incidents take place. Where plans are in place to address behavioural concerns, progress should be reviewed with the commissioner at least every six weeks, and if required, different levels or types of support proposed.</p>		

**Quality of education**

<p><b>4.1 Teaching staff and instructors should have the appropriate skills, knowledge and qualifications to deliver programmes</b> Teachers in non-school alternative provision are not required to have qualified teacher status (QTS) or any particular subject qualifications. However, providers should ensure that teaching staff and instructors should have a good understanding, skills and knowledge of the subject(s) they are delivering.</p>		
<p><b>4.2 Planning for learning shows lesson/session plans identify the knowledge, skills and understanding that all children attending their settings will aim to achieve</b> Providers should draw up and maintain curriculum documentation covering the following areas: • the setting’s overall approach to its curriculum (i.e. the programmes it delivers) • proposals for how that written policy</p>		

<p>on curriculum will be implemented ('plans') • detailed specifications of what programmes are delivered to children ('schemes of work') and how this should be shared with schools; and • intended outcomes of the curriculum e.g. external qualifications, regulation strategies The curriculum should be relevant to the age, aptitude and individual needs of all children placed within non-school alternative provision settings, including those with SEND. Providers should be aware of any adaptations or additional needs when planning the curriculum and the sequence of learning, and adapt the approach based on these needs. Where providers offer qualifications or other accreditations they should provide commissioners with details of compliance with awarding bodies in terms of staff training, record keeping or exams. 23 Providers should ensure their programmes allow children to develop speaking and listening skills. In cases where providers are delivering all of a child's education, they should ensure that the child is able to develop their literacy and numeracy when attending the provision.</p>		
<p><b>4.3 There is a clear process for setting targets and monitoring learning progress, supporting re-integration and transition where appropriate, and for taking actions if progress is not on track</b> Providers should record and assess a child's individual learning performance so they can track the child's progress against their planned learning outcomes and targets (as established during the induction process outlines in standard 3.3). This information should be used to direct teaching and instruction. Assessments of children's progress should be easily understood by commissioners and reviewed at least every six weeks. Providers should also provide regular updates to parents and carers. If at any time throughout the placement, a child is not making the expected progress, the setting should raise any potential under performance at the earliest opportunity with the commissioner. If necessary, an early review of the placement can be organised to address the issues and identify whether more or different support is needed.</p>		
<p><b>4.4 Providers should have processes in place to self-evaluate whether they are effective in delivering the commissioned services</b> Providers are responsible for demonstrating that they can offer and deliver good educational provision and support for children. To help ensure this, providers should continuously evaluate their own practices so that they can be confident their setting continues to be high quality and support the needs of children and commissioners. There is no set way of doing this. However, providers can demonstrate their commitment to best practice</p>		

through the following: • internal improvement and development plans • self-assessment of staff and child progress • child, parent or carer, commissioner feedback, including satisfaction surveys • up to date audit reports and annual accounts • actions taken in response to local area quality assurance visits

## Standards required

### Safeguarding and Welfare

- Enhanced DBS checks are carried out on all staff. DBS certificates were checked and were all issued within 3 years and name the provider visited.
- A single central record (SCR) is maintained. The SCR was checked at the visit and lists all adults who come into regular contact with children at the provision.
- Clear policies are in place covering child protection, behaviour, and staff conduct and are reviewed annually.
- A safeguarding lead is appointed with responsibility for referrals and liaison with services. Date of certificates for safeguarding training must be checked on the visit (must be reviewed every 2 years, at least).
- The setting is secure, with access appropriately restricted. [\[ap.dcpco.co.uk\]](http://ap.dcpco.co.uk)

### Health & Safety

- A robust health and safety policy is in place and is reviewed annually, including risk assessments and support for medical needs.
- First aid provision is adequate and all incidents are reported. Check First Aid kits and accident log on visit.
- Specialist equipment is regularly inspected and used safely. Check fire extinguishers and blankets on visit.
- A fire safety policy, evacuation plan, and up-to-date risk assessments are in place and are reviewed annually. [\[ap.dcpco.co.uk\]](http://ap.dcpco.co.uk)
- Medication is stored securely and administered according to health advice.

### **Admissions, Support & Guidance**

- A clear admissions policy and referral process are in place.
- Detailed records are kept (e.g., EHCPs, PEPs, safeguarding info).
- A thorough induction is provided so children understand expectations and available support.
- Attendance is recorded and reported promptly, with follow-up on absences.
- Behaviour strategies are implemented and updates shared with commissioners and parents. [\[ap.dcprouk.co.uk\]](http://ap.dcprouk.co.uk)

### **Quality of Education**

- Staff have the right skills and knowledge to deliver programmes.
- The curriculum is planned to suit children's age, ability and needs, with literacy and numeracy embedded.
- Progress is assessed and reviewed regularly, with reports shared with commissioners and families.
- The provider undertakes continuous self-evaluation and reflection to improve.

Does the provider meet all required standards? Yes  No

### **Visit Summary**

<b>Areas for consideration</b>

DRAFT