Reflections Training Academy
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POLICY FOR SAFEGUARDING CHILDREN, YOUNG PERSONS, VULNERABLE ADULTS & ADULTS

Building a Culture of Safety

Statutory
This policy is based on the statutory guidance from the Department of Education (DFE) issued under the Section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended); Further and Higher Education Act, 1992. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children.

This policy has been drawn up with close reference to The Children Act (1989 and 2004), The Education Act (2002 and 2011), The Prevent Duty for England and Wales (2015 and 2023) under section 26 of the Counterterrorism and Security Act 2015, Keeping Children Safe in Education 2026, Children's Social Care National Framework, (2023), Statutory guidance, Working Together to Safeguard Children(2026), Departmental advice: What to do if you're worried a child is being abused – advice for practitioners, Care Act (2014), Safeguarding Vulnerable Groups Act, 2006 and the requirements of Local Safeguarding Children and Adults partnerships.

<u>Additional Academy Polices which underpin this policy should be read including:</u>

- Prevent Policy
- Online Policy
- Domestic Abuse Statement
- Safer Recruitment
- GDPR
- Health and Safety
- Critical Incident
- Attendance and Punctuality
- Learner Behaviours and Expectations
- Mental Health
- SEN/D
- EDI
- Staff Safeguarding Code of Conduct
- Any appendices mentioned in the policy

<u>External Documents – to be read in conjunction with this Safeguarding Policy and KCSiE</u>

- Working Together to Safeguard Children, **2026**
- What to do if you're worried a child is being abused: **advice for practitioners, 2015**
- **Prevent Duty, 2024**
- KCSiE 2026: Annex A – important additional information about specific form of abuse, exploitation and safeguarding issues

In Keeping Children Safe in Education (KCSiE) 2026, reference is made to "children and young people". The term is used to mean those under the age of 18 years old or 25 if they are considered at risk; for example, learners with learning disabilities, those in Care or previously in care, those with an EHCP (Education, Health, Care Plan) and those with mental health concerns. Throughout this policy and safeguarding procedures, these will be identified as **learners.**

We all have a statutory duty to safeguard and promote the welfare of learners and to maintain the attitude of **'it could happen here'** where safeguarding is concerned and demonstrate professional curiosity to ascertain a learner's circumstances.
School and college staff are particularly important, as they can identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

Terms **"must"** and **"should"** are used throughout KCSIE, 2026. **"Must"** is used when the person in question is legally required to do something, and **"should"** when the advice set out should be followed unless there is good reason not to.

The policy and its appendices detail Reflection Training Academy's safeguarding process and procedures to ensure the safety and wellbeing of its learners.
In applying this policy, Reflections will apply its core values of Care, Passion, Professionalism, Quality and Image always.

- **Care** – for learner's safety and welfare
- **Passion** – to provide a safe and secure environment where learners can learn, flourish and succeed
- **Professionalism** – the way we conduct ourselves in meeting and exceeding learners' wellbeing and support needs
- **Quality** – of the welfare and support demonstrated to the learner at all times
- **Image** – clearly displaying welfare and support throughout academy buildings and learner friendly resources to support welfare.

Prevent / Safeguarding (DSL)
Reflections Training Academy

Suzanne Sewell

This policy was considered and adopted by the following Directors:

Clare Barrett
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Lucy Agnew
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Kate Sperring
Director of Next Level Training

Policy Owner	Director sign off	Details of update	Date of Update	Version number
Jason Timms	Lucy Agnew	Policy review & update	29/06/20	14
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Jason Timms	Lucy Agnew	Policy review & KCSiE 2021 Update	22/09/21	16

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Suzanne Sewell	Lucy Agnew	Policy review & KCSIE 2025 Update	06/08/25	21
Suzanne Sewell	Lucy Agnew	Policy review & KCSIE 2026 Update	03/08/26	22

Next review date: September **2027**

1. Introduction

Reflections *Training Academy* are passionate about safeguarding our learners. *"**Schools and Colleges and their staff form part of the wider safeguarding system for children**." **Working Together to Safeguard Children 2026***. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of learners at risk of harm under our duty of care, but also a moral duty, providing a safe environment where learners can learn, flourish and succeed.

Reflections Training Academy policy overarches safeguarding with subsequent appendices outlining safeguarding arrangements in key areas including safe recruitment, allegations and early help support for learners, promoting of welfare by:

- Clarifying standards of behaviour for staff and learners
- Promotion of an ethos that promotes mutual respect and shared values and a robust culture of vigilance
- Including safeguarding in a robust pastoral system to enable learners to keep themselves and others safe
- Preventing the impairment of learners mental and physical health or development
- Addressing concerns at the earliest possible stage to protect learners from maltreatment and/or abuse
- Supporting those who have been abused, are vulnerable to abuse or who have witnessed violence
- Enabling the development of knowledge and skills to understand risk with the provision of appropriate and effective care
- Ensuring all staff are aware of Academy safeguarding systems and processes
- Ensuring that everyone who meets learners understands their role in identifying concerns, sharing information and taking prompt action
- Ensuring that online safety is promoted within the Academy's infrastructure with the use of filters and monitoring systems and is an integral part of pastoral and training programmes through training and understanding of what must be followed

For ease of access, the policy has been organised under the following headings:

1. Governance Responsibilities
2. Management and Responsibilities for Safeguarding
3. Multi-agency Partnership
4. Data Sharing and Confidentiality
5. Online Safety - filtering and monitoring procedures

5b. Online Safety – Misinformation and Disinformation

6. Safe Recruitment and Selection Procedures
7. Staff Training including induction procedures
8. Safeguarding Learners including LGBTQ+ and gender questioning
9. Absent from education
10. Identifying Safeguarding Concerns
11. Reporting a concern about a learner
12. Managing concerns about learners
13. Allegations against other **learners** (child on child)
13b. Domestic Abuse and Operation Encompass
13c. Safeguarding allegations against **staff**
14. Safeguarding within the workplace - Employers Responsibilities
15. Safeguarding allegations within the workplace – employment and/or work experience
16. Whistleblowing
17. Universal Services and Community-based Early Help, including targeted Family Help
18. Glossary
19. Local Authority LADO contact details

Definition of Safeguarding (taken from Working Together to Safeguard Children, and in line with KCSIE, 2026

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

"Adults at risk". An adult at risk of abuse or neglect is defined as 'someone who has needs for care and support, who is experiencing or at risk of, abuse or neglect and because of their needs - is unable to protect themselves' (Care Act 2014)
All Reflections safeguarding procedures will be applied with appropriate adaptations to all learners.

1. Governance Responsibilities

The Reflections Training Governance board abide by their responsibilities as outlined in KCSiE, 2026. Governors have a strategic leadership responsibility for the academy's safeguarding arrangements and must ensure these comply with duties under legislation. Governors must have regard to this guidance, ensuring policies, procedures and training in the academy are effective and comply with the law at all times. Governors also have specific responsibility to provide strategic challenge for ensuring that the Academy monitors the impact of its work and learns lessons from its safeguarding concerns. As stated in KCSiE 2026, "Governing body ensures there are appropriate policies and procedures in place to provide strategic challenge. In practice this means the academy is:

- Provides a safe environment for learners at risk of harm to learn in.
- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- Take appropriate action to see that learners are kept safe at training and that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.

- Refer concerns that a learner at risk of significant harm or might be at risk of significant harm to the appropriate referral agencies.
- Work effectively with others as required by "Working Together to Safeguard Children".
- Compliant with safer recruitment expectations including enhanced DBS and update service subscription
- Secure with storage of safeguarding files including Child Protection
- Responding to learners who are absent from education; particularly those on repeat occasions and/or prolonged periods
- Listen to the voice of the learner and always act in the interest of the learner.
- Ensure that appropriate filtering and monitoring systems are in place and regularly review their effectiveness
- Oversight of staff training, including online safety is integrated, aligned and considered as part of the whole approach and wider staff training and curriculum planning
- Having due regard to Staff Safeguarding Code of Conduct which includes low-level concerns, allegations against staff and whistleblowing, plus acceptable use of technologies (including the use of mobile devices), staff/learner relationships and communications including the use of social media.
- Having oversight of Data Protection Laws

Governors receive suitable training to familiarise them with our safeguarding policies and procedures and their safeguarding roles and responsibilities. Governors will receive annual KCSiE and safeguarding policy training in line with updates.

A Nominated Governor for Safeguarding will be allocated. The role is strategic rather than operational – they will not be involved in concerns about individual learners. The nominated governor will receive training relevant to the governance role, and this will be updated as required.

2. The Management and Responsibilities for Safeguarding

'Safeguarding and promoting the welfare of children is **everyone's responsibility'**. Everyone who encounters children and their families and carers have a role to play.
To fulfil this responsibility effectively, all professionals should make sure their approach is child centred; identify concerns, share information and take prompt action. This means that they should consider, always, 'what is in the best interests of the child.' (KCSiE 2026)

Safeguarding Issues
All staff will have an awareness of safeguarding issues that often overlap and can put learners at risk of harm with, and not limited to, the following behaviours and indicators being a sign:

- Drug taking and/or alcohol misuse
- Unexplainable and/pr persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
- Consensual and non-consensual sharing of self-generated intimate images including those generated using AI such as deepfakes and/or videos

All staff have a responsibility to:

- Provide a safe environment in which everyone can learn and reduce permissive environments
- Pay due diligence to the Human Rights Act, 1998 and Equality Act, 2010
- All staff should be prepared to identify children who may benefit from Family Help which means providing support as soon as a problem emerges – refer to **section 17** for a description of what is meant by 'Family Help'

- Report concerns and recognises the importance of raising all concerns and not see any as insignificant; including accurate and detailed records of the concern and actions taken.
- Should not assume someone else will act and share information that might be critical in keeping learners safe. Be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate provision, whether when problems first emerge, or where a child is already known to the Local Authority Social Care (such as a Child in Need – CIN or Child Protection – CP).
- Staff should expect to support Children's Social Care and other agencies following a referral. This can be found In para. 54 – 60 (KCSiE) Appendix 2 – Reporting a Concern
- It needs to be understood that abuse and maltreatment can be complex and may not be evident in one concern but in a picture built up over time through the consistent reporting of concerns. This is particularly evident in cases of emotional abuse and neglect. It is crucial that information is passed on to the DSL/DSO without delay to enable support to be accessed at the earliest opportunity.
- Be aware of the indicators of abuse and neglect to enable the identification of those children who require help or protection
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside the training academy and/or can occur between learners outside of these environments
- Consider the risk to learners of abuse and exploitation in situations outside their families including child criminal exploitation, child sexual exploitation, and serious youth violence
- Be aware that safeguarding incidents and/or behaviours can be associated within their Apprenticeship employment and work placements if enrolled on a 16-19 Fulltime Programme/Learner Loan
- Staff are inducted and made aware of all systems, processes and procedures which support safeguarding and prevent, staff will then be updated within set times of the academic year.
- Staff conduct themselves in line with **Appendix 2 – Staff Safeguarding Code of Conduct (updated July 2026)**

Senior Manager Divisional Prevent / Safeguarding (DSL), Suzanne Sewell is the Designated Safeguarding Lead with lead responsibility for safeguarding and child protection (including online safety and understanding filtering and monitoring systems and processes in place); oversight of all divisional safeguarding arrangements, to keep all divisional Academy Safeguarding policies and procedures update and to keep Academy Personal up to date of changes to policies & procedures and safeguarding legislation via inductions, staff briefings and training sessions and within the Birmingham* Academy building with responsibilities for the examining of, and reporting of allegations of abuse to the relevant authority. The DSL will also act as the Bristol and Birmingham Designated person for looked after children and care leavers.

Further information can be found in KCSIE, 2026, Annex B

Pastoral Support/Safeguarding Officer is the **DSO,** Louise Forde with responsibilities for safeguarding arrangements, to keep Academy Safeguarding policies and procedures update and to keep Academy Personal up to date of changes to policies & procedures and safeguarding legislation via inductions, staff briefings and training sessions and within the Bristol* Academy building with responsibilities for the examining of and reporting of allegations of abuse to the relevant authority. The DSO will also act as the Birmingham Designated person for looked after children and care leavers, supported by DSL.

Directors are responsible for oversight of the DSL's and will monitor safeguarding performance, policy, procedures, processes and systems monthly.

Tutor / Assessors and Skills Support Tutors are responsible for reporting any disclosures or suspicions of abuse to the DSL in line with the academy reporting process in **appendix 1.** Conducting themselves in a manner to not give rise to an allegation of abuse, this includes but is not limited to socialising with learners, holding personal contact details of learners (e.g. mobile phone numbers) for own personal use, unnecessary physical contact, inappropriate language or conversation in line with **staff safeguarding code of conduct.** Tutor/Assessors are responsible for supporting the DSLs in the delivery, and monitoring support of safeguarding to the learners under their duty of care.

DSL Cover Arrangements
The DSL and DSO will deputise for each other when one is not on site (for example annual leave).
Information on raising safeguarding concerns can be found at www.reflectionstraining.co.uk where there is a dedicated safeguarding hub page with a shared email address: safeguarding@reflectionstraining.co.uk

3. Multi-Agency Working in Partnership

We work in partnership with other agencies to promote the best interests of our young people as a top priority in all decisions and actions that affect them. Reflections will, where necessary, liaise with these agencies and make requests for support from the applicable Local Authority first response teams (listed at the end of this policy). These requests will be made by the DSL. Where the young person already has a safeguarding Social Worker or Family Support Worker, the request for support should go immediately to the team involved, or in their absence to their team manager.

When invited the DSL will participate in any MASH strategy meeting, usually by conference phone, adding any held data and intelligence to the discussion so that the best interests of the young person are met.

We will co-operate with any Child Protection enquiries conducted by local authorities and will ensure representation at appropriate inter-agency meetings such as Our Family Plan, Children in Need, Initial and Review Child Protection Conferences, and Core Group meetings. We will provide reports as required for these meetings.

Where a learner is subject to an inter-agency Child Protection Plan or a multi-agency risk assessment conference (MARAC) meeting, we will contribute to the preparation, implementation and review of the plan as appropriate.
Reflections work in liaison with agencies that support learners who may have vulnerabilities due to SEND or LAC attending and contributing all required meetings in supporting the learner's needs and vulnerabilities.

Where the police are investigating a safeguarding concern, if requested Reflections Training will cooperate fully with the investigation.

Further information can be found within KCSIE, 2026 ***para 129 – 145 and Annex B***

4. Data Protection, GDPR and Data Act (data protection laws)

The academy will follow the guidance as set out in the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025. The Act outlines that “UK-GDPR regulations do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protection of learners.

Where a referral is made to an outside agency for support outside of the statutory requirements, then this will only be done with permission from the learner to carry out the referral and disclose their personal information.

The DSL will ensure that a learner's Safeguarding file is transferred to a different educational setting should they move on and the process for doing this is either by electronic My Concern transfer to the educational settings My Concern system or print out of My Concern audit trail and uploaded evidence and post by recorded delivery marked Private & Confidential FAO the settings DSL

5. Online Safety - Filtering and Monitoring Procedures

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, Reflections Training Academy ensure that we do all that we reasonably can to limit learner's exposure to the above risks from the Academy IT systems. We use content filtering that meets or exceeds the DfE Filtering & Monitoring Standards on all in-house learner accessible IT systems which are in place for the safety of all learners. This monitors, flags, and blocks access to websites that are blacklisted or considered to be dangerous, harmful or contain inappropriate content.

Lanschool monitoring software is in place on learner servers, alerting to keystrokes, keywords and inappropriate access. The monitoring and content filtering systems are monitored by the DSL/DSO with support from the IT team who alert the safeguarding team to any alerts. These are then dealt with under normal safeguarding processes and logged via My Concern. Any misuse of AI or social media will be reported to the DSL/DSO and the Digital Concerns/Incident Reporting form will be used to capture the investigation.

Biannual testing of the in-house learner accessible IT systems and servers is carried out using the SWGfL Test Filtering online utility ~~which test against the IWF URL list,~~ UK terrorist content (CTIRU) list and checks whether filters are blocking certain types of harmful or illegal content. Specifically, child sexual abuse material, terrorist related content, pornographic content and pages that contain profanity

There is a recognition that most learners are using data on their phones, this means that not only must staff think about filtering and monitoring within the Academy IT infrastructure, but they also need to be vigilant to Learners accessing the internet whilst they're at Academy locations.

Our Learner Acceptable Use of Technology Policy Agreement states the importance of being safe online, our fulfilment to the Prevent Duty, what our IT equipment is allowed to be used for and what is unacceptable. Any unacceptable use of IT will be handled in line with the conduct and behaviour policies.

The use of technologies impacting safeguarding are monitored and risky or inappropriate behaviours with technology are raised as safeguarding concerns.

For all remote and online delivery, all staff & Learners are required to follow Learner Acceptable Use Agreement **(appendix 5)** and requirements set out within the Online Safety Policy.

All team members and learners are inducted to online safety and the online dangers of content, conduct, contact and commerce. Further information can be found within the Online Safety Policy, July 2026.

Further information can be found at KCSIE, 2026 ***para 157-175***

5b. Online Safety Misinformation, Disinformation and Conspiracy Theories
As part of our statutory duty under KCSiE, we recognise the growing safeguarding risk posed by online spread of misinformation (false or misleading information shared without harmful intent) and disinformation (false information shared with intent to deceive). We are committed to helping learners develop digital resilience, critical thinking, and the ability to safely navigate online spaces.

This includes:

- Educating learners, through the curriculum, on how to identify, question and challenge misinformation and disinformation.
- Training all staff to recognise the safeguarding risks linked to harmful or radicalising content shared online, including health-related misinformation, extremist narratives, and conspiracy theories.
- Ensuring our filtering and monitoring systems are regularly reviewed and updated to reflect emerging online risks
- Acting promptly when pupils are found to be sharing, influenced by, or harmed by false online content that may affect their safety, wellbeing, or the safety of others
- Raising awareness of online risks and promotion of safe, informed use of digital media within the home or workplace.

Where concerns are linked to misinformation, disinformation, or harmful content, these will be managed in line with our safeguarding procedures and, where necessary, referred to the Designated Safeguarding Lead/Officer (DSL/DSO), external agencies or prevent.

6. Safe Recruitment & Selection

Reflections pay full regard to KCSiE 2026, and all staff recruitment will include reference to Reflections commitment to safeguarding and promoting the wellbeing of learners. All staff employed by Reflections Training Academies who have direct access to learners and are fully competent within sector areas and required professional qualifications go through a rigorous recruitment procedure as detailed in **The Staff Safe Recruitment Procedure - Appendix 3**, which includes an Enhanced Level Disclosure and Barring Service (DBS) check, an online digital footprint check and two satisfactory references. Evidence of these checks are recorded on our electronic Single Central Record SENTRY.

Other safe recruitment areas recorded and evidenced within SENTRY include the right to work in the UK (United Kingdom), identity, Overseas Checks, DBS update service status change, online digital footprint search and fitness to carry out role checks.

Any adult (not an existing member of staff) such as contractors or visiting employers/speakers who will have access to learners or learner information will be subject to a risk assessment process to determine the need to provide evidence of, or requirement to carry out DBS check before carrying out any activity/contract with the training academy. Any visiting tutor will be subject to a Visiting tutor / external speaker process and will be required to sign and commit to the visiting tutor / external speaker agreement.

Governors are inducted and agree to terms of reference on being appointed to the Governance board inclusive of safeguarding commitments to the role.

Further information can be found in KCSIE, 2026 Part 3 ***para 276 – 424***

7. Staff Training including Induction

'Receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction.In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, via emails, e-bulletins and staff meetings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively.' Further information can be found in: ***Part 1, para 166 – 169***

We have robust safeguarding training for all staff.

- There are comprehensive induction processes and schedules for all team members where all required safeguarding and online safety documents, policies and processes including Part 1 KCSIE are provided both at induction of new staff, and on a yearly refresher basis or as incident or change dictates for current staff. To ensure Team members have fully read and understood these documents and policies team members will confirm receipt and understanding of documents and policies via My Concern.
- All staff receive safeguarding CPD training to meet and exceed and receive regular updates through team meetings, to develop and support effective safeguarding practice.
- Staff CPD training will be delivered refreshed in response to any serious safeguarding incident and / or arising or identified risks to ensure all aware and vigilant to identify.
- Both DSL's have undergone external DSL training which is refreshed every 2 years. DSL's continually attend safeguarding and pastoral support CPD workshops throughout the year and both DSLs are subscribed to several relevant support services and attend a wide range of local authority safeguarding development workshops to ensure the knowledge base is current with local safeguarding. Further knowledge and understanding are gained from sector-specific workshops with external agencies, regular email newsletters from specialist safeguarding organisations and experts and My Concern webinars. DSLs have selected a pertinent number of website materials which are used with both learners and staff.

8. Safeguarding Learners – Support before Statutory Intervention

Reflections Training believe that ***"Safeguarding professionals should work closely with education and childcare settings to share information, identify and understand risks of harm, and ensure children and families receive timely support"*** (KCSiE, 2026)

- All Learners have the right to be protected from harm, abuse and neglect;
- Every learner has the right to an education and learners need to be safe and feel safe in training and their apprenticeship or work experience workplace;
- Learners need support that meets their individual needs, including those who may have experienced abuse;
- All learners have the right to express their views, feelings and wishes and voice their own values and beliefs;
- All learners should be encouraged to respect each other's values and support each other in line with the Academy Expectations and behaviours;
- All learners have the right to be supported to meet their emotional and social needs as well as their educational needs as this will promote educational achievement;

This Policy will contribute to **learner support** by;

- Identifying and protecting vulnerable learners
- **Early identification of heightened vulnerabilities** and needs and planning to address those needs which may include:
    - The fact that a child or young person may be LGBTQI+ is not in itself a risk factor for harm. However, LBGTQI+ learners can be targeted by others, and in some cases a learner who is perceived to be LGBTQI+ (whether they are or not) can just as vulnerable at those who identify as LGBTQI+
    - Support for gender questioning young people
    - Child in Care or a Previously Looked After Child
    - Care Leaver
    - SEND or certain medical or physical health conditions which may entail additional safeguarding challenges both online and offline.
    - Complex mental health
    - Young Carer
    - History of one or more ACEs

- Reviewing and assessing the effectiveness of any plans of support agreed and amended to meet changing needs

This policy will contribute to the **protection** of learners by;

- Implementing Safeguarding policies and procedures and working in full and transparent partnership with learners, employers, parents/carers and other agencies
- Raising staff knowledge and understanding of the risks and vulnerabilities faced by learners, embedding safeguarding through effective communication and following continuous professional development policy to promote understanding that no single professional can have the full understanding of young persons or vulnerable adult's needs and circumstances.
- Robust monitoring and filtering systems
- Opportunities to teach Safeguarding: Developing learner awareness of safeguarding risks and vulnerabilities by supporting the prevention of abuse, sexual harassment and violence, victimization, bullying (including homophobic, bi-phobic, trans-phobic and cyberbullying), exploitation, serious youth violence, radicalisation, extreme behaviours, discriminatory views and risk-taking behaviours with its learners through awareness-raising workshops, dedicated safeguarding Padlet, Smart Assessor safeguarding resource section, robust concern reporting system as well as pastoral and wellbeing support.
- Encouraging learners to participate within an ethos of transparency and to have a voice and feel listened to inclusive of pre-review, learner forums and surveys carried out.

9. Absent from education

Attendance to training is closely monitored at all times. Any learners that persistently go missing from training or have been missing from training for an extended period will be actioned in line with the 4-step process within the Attendance & Punctuality Policy. If any safeguarding area of concern is identified during this process a My Concern report will be raised and managed in line with **sections 11 and 12** (Reporting and Managing a Concern)

Any learners who are on the Safeguarding Risk register who are persistently absent from training or have been missing from training for an extended period will be contacted and followed up by the safeguarding team working alongside side the learner's personal tutor. If contact is difficult to make, then the individual's employer or emergency contacts recorded within the learner pen portrait will be contacted to establish whereabouts and wellbeing of learner. 'Persistent absence can be an indicator of exploitation risks – refer to **section 17** for further explanation and indicators.

10.Identifying Safeguarding Concerns

There are several stages where a safeguarding concern can be identified during the learner journey

- During the recruitment process – CRM application form question and verbal questioning over any existing safeguarding needs. Disclosure on the Individual Learner Record LLDD field, Disclosure of or receipt of EHCP, referrals from external agencies such Youth offending, social workers, SENAR, care home etc.
- Induction Processes – all learners undergo a private & confidential 1-2-1 pen portrait inclusive of Safeguarding / medical / pastoral support needs and barriers to learning.
- Liaison with prior education provider DSL team over historic Safeguarding files
- Receipt of transferred safeguarding file from prior Education provider
- Individual support plan meetings with learner and parent/carer (16-19 Fulltime programmes)
- Disclosure by a learner or employer via website concern form or safeguarding email
- On programme by staff identification or learner/employer /parent / carer disclosure.
- Regular 10–12 week on-programme reviews inclusive of confidential pre-review with safeguarding support questioning (Apprenticeships) and every 8 weeks (16-19 Fulltime Programmes)
- Learners exiting programme inclusive of exit questionnaire with safeguarding section.

11. Reporting a concern about a learner

All staff have equal responsibility to report their concerns about a learner or the behaviour of any learner or adult without delay to the DSL via My Concern as detailed in **Appendix 1.** Whilst the DSL or deputies will normally make external referrals, any staff member can refer their concerns to relevant agencies directly in emergencies. In all cases, if staff are unsure, they should always speak with the DSL.

Learners, parent/carers and employers can report a concern directly to the safeguarding team via phone, email to safeguarding@reflectionstraining.co.uk or via the concern contact form at https://www.reflectionstraining.co.uk/safeguarding/

Everyone has a responsibility to escalate their concerns and 'press for reconsideration if they believe a Learner needs further exploration.

If staff have a concern, they should follow their own organisation's policy and procedure and speak to the designated safeguarding lead or designated safeguarding officer.

Options will then include:

- managing any support for the child internally via academy systems
- undertaking an early help assessment or;
- making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm – refer to **section 19** for contact details

Key Staff will work in partnership with other agencies to promote the welfare of young people and protect them from harm, including the need to share information to safeguard them in line with information sharing guidelines.

12. Managing Concerns about learners

On receipt of My Concern email alert of concern received the DSL/DSO will review the concern and allocate the appropriate Level of Need to the learner Profile on My Concern in line with **Appendix 1.** Alongside being categorised with the above level of need each concern will be given an appropriate level risk band, and depending on the level given, the DSL will contact the learner as soon as possible (but not to exceed 24 hours) to ensure concern and support

mechanisms are instigated timely with one of the following actions. This would generally be for a concern considered **Level 3 – medium risk of Level 4 – High risk.**

All concerns of sexual violence referred to the Local Authority and/or the police or Prevent referrals to Chanel must also be notified to the DfE via the Contact Form: General enquires at https://form.education.gov.uk/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-f9f4f5a1-936f-448b-bbeb-9dcdd595f468/AF-Stage-8aa41278-3cdd-45a3-ad87-80cbffb8b992/definition.json&redirectlink=%2Fen&cancelRedirectLink=%2Fen&consentMessage=yes

DSL will monitor and remain in contact with the learner whilst the concern remains open.

13. Allegations against other Learners (Child on Child)

'All staff should recognise that children can abuse other children (including online). All staff should be clear on the academy's policies and procedures, regarding child-on-child abuse' KCSIE 2026 **para 156-157**

All Learners have the right to be protected from harm and abuse including from other children. Child on Child abuse can take many forms as detailed in **section 17** but includes sexual violence or sexual harassment.

Reflections Training Academy has a Zero Tolerance approach to sexual violence and sexual harassment, and it is not tolerated or acceptable. It should never be passed off as "banter", "just having a laugh" "flirting" or "boys being boys" and all must be vigilant to identifying it and adopt a 'it could happen here' attitude both in academy buildings but also apprenticeship employer workplaces.

All instances identified must be reported via the My Concern reporting process detailed in section 11. Any disclosures will be recorded on My Concern.
Learners can privately and confidentially disclose any form of abuse via the Academy 'If in Doubt Shout' reporting system directly to the safeguarding team either in person, by call, text message or WhatsApp to the DSL's mobile or via the concern contact form at https://www.reflectionstraining.co.uk/safeguarding/ or by emailing safeguarding@reflectionstraining.co.uk

All instances of Child-on-Child abuse must be taken seriously will be investigated fully and sensitively by the DSL considering the wishes of the victim viewing all available evidence. The investigation will consider:

- The nature of the alleged abuse including whether an alleged crime has been committed
- Any power imbalance, for example is alleged perpetrator older, in a position of authority or victim have a vulnerability
- Are there any ongoing risk to the victim or others (learners, team members, siblings)
- Any links to other issues such as CSE, gangs, drug usage etc.

The victim will be interviewed, and a statement taken along with any witnesses. Statements along with any other evidence (**photos*,** Body Map, text messages, emails etc) will be logged on My Concern (as a separate file and not within the main chronology section)

Any youth-produced sexual imagery or any media that may include illegal images of an under 18-year-old are not to viewed by team members or forwarded or uploaded to My Concern. Any images of this type must only be viewed by the police.

Victims of sexual Violence or harassment

The internal investigation may lead to several conclusions:

- There are grounds that the allegation may be or is true. The appropriate proportional action to be taken (as listed below)
- The alleged perpetrator has acted inappropriately but it does not require social care or police action. The action was in breach of Academy rules and to be either managed internally with the academy disciplinary process or identified early help.
- The alleged perpetrator has acted outside expected Academy standards of conduct, but it is not a safeguarding issue. The action lay outside the bounds of Academy rules so the perpetrator will be managed internally with the Academy disciplinary process
- There is no basis for the allegation or suspicion. No further action is to be taken under these procedures. If a report or accusation is determined to be unsubstantiated, unfounded, false or malicious then consideration should be given whether the person who made the allegation needs early help or managed internally with the Academy disciplinary process

Actions to be taken

- **Manage internally** – for incidents not meeting reporting thresholds
- **Early Help –** where referral to statutory services not required but learners involved may benefit from early help
- **Referral to Children's services –** when an under 18 has been harmed, at risk of harm or is in immediate danger
- **Referral to police –** usually in parallel with above referral or if over 18 has been harmed, at risk of harm or is in immediate danger

All outcomes and conclusions will be recorded within the My Concern report of the incident, and where identified case closed. DSL with support from DSO or Director will complete: **Learner Incident Reporting Form and Learner Declaration Form (June 2026 V1)**

A dedicated **NSPCC helpline 0800 136 663** is also available to support anyone who has experienced sexual abuse in educational settings or has concerns about someone.

13b. Domestic Abuse: The Reflections team understand the statutory definition of domestic abuse (Act 2021) understanding that different types of relationships are captured, including ex-partners and family members and recognises the impact of domestic abuse on children, as victims (in their own right), if they see, hear or experience the effects of abuse. Active discussion around a range of different abusive behaviours, including physical, emotional, economic, and coercive and controlling behaviour formulate ongoing staff and learner CPD and wider skills curriculum delivery.

13b. Operation Encompass: Both the DSL and DSO are linked with Operation Encompass and where necessary will receive notification if a learner has been in a household who have experienced domestic abuse. Support will be provided as appropriate to each learner following the Reporting of a concern process and procedure.

13c. Safeguarding Allegations against staff

When examining an allegation, care must be taken to ask only enough questions to get the basic facts and not to form any sort of investigation that may prejudice the investigating authority, taking care to avoid any leading questions. It must be established if the allegation / concern meets the harm threshold, and the team member has

- Behaved in a way that has harmed a child / learner, or may have harmed a child/ learner and / or;
- Possibly committed a criminal offence against or related to a child / learner and / or;
- Behave towards a child / learner or children in a way that indicates he or she may pose a risk of harm to children / learners and /or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children / learners (inclusive of behaviour that may have happened outside of training that might make an individual unsuitable to work with children also known as a transferable risk)

The DSL or investigating officer should discuss the case with the LADO, the nature, content and context of the allegation / concern, providing as much evidence as they have at the time and agree a course of action ***(it is for the LADO to make the decision as to what needs to happen next and not the academy as we are information providers but not decision makers). However, it is in the remit of the academy to follow established HR procedures as outlined in this policy and Staff Code of Conduct.***

This examination may lead to several conclusions:

- There are grounds that the allegation / concern may be true and meet the harms threshold. This must be reported to the local safeguarding team and/or social services department within one working day.
- There are grounds that the allegation / concern may be true and **does not meet*** the harms threshold. The allegation will be investigated internally and managed via company policies
- A staff member has acted inappropriately but it is not a safeguarding issue. The action was in breach of company rules and disciplinary action and/or training may be needed.
- A staff member has acted inappropriately **but it is not a safeguarding issue.** The action taken lays within the bounds of company rules and therefore there is a need to review policies and procedures.
- There is no basis for the allegation or suspicion. No further action is to be taken under these procedures. The decision and justification for it must be recorded on the case report. If a report or accusation is determined to be unsubstantiated, unfounded, false or malicious then consideration should be given whether the person who made the allegation needs early help or managed internally with the Academy disciplinary process

*'Does not meet are indicated as Low-level concerns but in themselves are not insignificant – a concern is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt', **KCSiE Para 430 - 433**

All allegations of abuse made against a staff member must be notified to the ESFA via the Contact Form: **General enquires hyperlinked in section 12**

In instances where a staff is under investigation for a safeguarding concern and leaves, resigns or ceases to provide their services, then ever effort must be made for the investigation to be reach its conclusion including in which the person concerns refuse to cooperate.

Where a staff member is removed from regulated activity (or would have been removed had they not left) and the individual and meets the DBS referral criteria at https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs then the referral must be made and documented and recorded on My Concern

Further information can be found within **KCSiE, 2026 Part 4**

14. Safeguarding at Work Placements – Employer Responsibility

All employer partners will be inducted to the Safeguarding procedures and requirements during initial set up* meetings and annual H&S checks taken by both the H&S and DSL/O team. Placement employers will be fully inducted on the requirements and sign to agree their commitment to the safeguarding statement for work placements, employers will be issued clear guidance alongside the 'If in Doubt, Shout' contacts.

Where a learner attends a work experience placement as part of their programme ~~(such as Study Programme/Learner Loan)~~ then the work placement will be subject to an additional Health & Safety vetting visit that includes additional Safeguarding elements. Safeguarding issues and procedures will be discussed with placement owners/supervisors and information handed out. A contract for training is then discussed and signed by the work placement and a Reflections representative. The contract contains clauses for safeguarding including the procedure for how employers can report any safeguarding issue that should arise.

All apprentices undergo 3-way review process every 10-12 weeks (assessor, employer and learner) face to face or virtual review process which includes safeguarding/welfare.
All 16-19 Fulltime learners undergo the same review process but every 8 weeks (length of programme is shorter)

*Where changes to ownership or additional services then a new assessment is to be carried out and tracked as a new employer.

15. Safeguarding Allegations within Work Placements

All Learners have the right to be protected from harm and abuse including within their apprenticeship and learner loans workplaces and 16-19 fulltime work experience placements. Learners can privately and confidentially disclose any form of abuse via the Academy 'If in Doubt Shout' reporting system directly to the safeguarding team or by emailing safeguarding@reflectionstraining.co.uk . Any disclosures will be recorded on My Concern.

All allegations of safeguarding incidents within apprenticeship workplaces or work experience placements will be investigated fully and sensitively by the DSL's considering the wishes of the victim viewing all available evidence. The investigation will be recorded on **SG Policy Document 17 - Incident Allegation Report Form.** The investigation will consider:

- The nature of the alleged abuse including whether a crime has been committed
- Any power imbalance, for example is alleged perpetrator older, in a position of authority or the victim has a vulnerability.
- Are there any ongoing risk to the victim or other learners employed within the workplace.
- Any links to other issues such as CSE, gangs, drug usage etc.

Where the allegation is of a safeguarding issue that meets any of the above or is of a nature that puts the accuser and any other apprentices or work experience attendee at risk of potential harm then all attendance by learners to the work placement will be **suspended with immediate effect** pending the investigation outcome. When suspension is put in place then the relevant academy and programme directors must be informed immediately so that their relevant teams can be informed of suspension and any planned site visits cancelled.

The victim will be interviewed, and a statement taken along with any witnesses. Statements along with any other evidence (SG Policy Document 17 - Incident Allegation Report Form, photos*, Body Map, text messages, emails etc) will be logged on My Concern.

Statements will be taken from the employer regarding the allegation

Any youth-produced sexual imagery or any media that may include illegal images of an under 18-year-old are not to viewed by team members or forwarded or uploaded to My Concern. Any images of this type must only be viewed by the police.

The internal investigation may lead to several conclusions:

- There are grounds that the allegation may be or is true. The appropriate proportional action to be taken (as listed below)
- The alleged perpetrator has acted inappropriately but it does not require social care or police action. The action was in breach of the Academy / Employer agreement
- There is no basis for the allegation or suspicion. No further action is to be taken under these procedures. The suspension of apprentices attending the employer to be lifted. If a report or accusation is determined to be unsubstantiated, unfounded, false or malicious then consideration should be given whether the person who made the allegation needs early help

Actions to be taken:

- **Manage internally** – for incidents not meeting reporting thresholds and the employer agreeing to corrective actions. Action plan to be agreed with all parties (employer, learner and parent / carers) and suspension lifted. Continue to monitor and agree follow up risk assessment visit to employer
- **Referral to Children's services –** when an under 18 has been harmed, at risk of harm or is in immediate danger. Employer relationship to be suspended / terminated as appropriate with immediate effect.
- **Referral to police –** usually in parallel with above referral or if over 18 has been harmed, at risk of harm or is in immediate danger. Employer relationship to be suspended / terminated as appropriate with immediate effect
- **Termination of Working Relationship with Employer –** it has been identified that learners have been harmed, are at risk of harm or are in immediate danger within an employer then the Academy will terminate its working relationship with the employer and support any apprentice or work experience learner sourcing alternative

All outcomes and conclusions will be recorded on **SG Policy Document 17 - Incident Allegation Report Form and** within the My Concern report of the incident and where identified the case will be closed.

16.Whistleblowing

All staff should be aware as well as their duty to raise and report safeguarding concerns, there is also the duty to report where concerns are present about the attitude, conduct or actions of colleagues who abuse their position of trust in line with the Staff Safeguarding Code of Conduct **(Appendix 2).**

Any such Safeguarding concerns should be raised in the strictest confidence to the DSL in person, by phone **07425607820** or email safeguarding@reflectionstraining.co.uk. Whistleblowing concerns about Safeguarding Leads should be raised to the relevant academy Director and concerns about Directors should be raised with the Divisional Director who will liaise with the Company Managing Director.
This procedure is designed to encourage openness and aims to allow staff and learners to report any safeguarding wrongdoing or raise issues that concern them that affect the welfare and safety of young people without fear of possible consequences or victimisation. There is a statutory duty of an employee to raise such concerns, and no detriment will be suffered provided that the employee is acting in good faith. Concerns raised will be follow the process as detailed in section 10.

For circumstances where these normal reporting lines cannot be followed then, concerns can be reported to the **NSPCC whistleblowing advice line on 0800 028 0285 or help@nspcc.org.uk**

17. Support before Statutory Intervention and Types of Abuse and Neglect

To ensure that our learners are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. All Academy staff should be aware that abuse, neglect, exploitation, modern slavery and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should be aware of the indicators of abuse, neglect and exploitation including modern slavery (see below), understanding that learners can be at risk of harm inside and outside of the academy, inside and outside of the home/place of residency, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of learners who may need help or protection.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether learners are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), physical, sexual, emotional, stalking, and criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Learners are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Learners can also abuse other learners online this can take the form of abusive, harassing, and misogynistic/misandrist messages, self-generated intimate images and/or videos especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL, Suzanne and/or DSO, Louise. If neither are available, one of the Director team must be located and information communicated.

KCSiE, 2026, states: Any child may benefit from support before statutory intervention, including from universal services and community-based Early help, or the targeted early level of Family Help. All school and college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether they have a statutory Education, Health and Care Plan or not)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care

- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, has been at risk of being permanently excluded from schools, colleges or alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the learner, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- Is privately fostered learner

Indicators of Abuse

Abuse: a form of maltreatment of a learner. Somebody may abuse or neglect a learner by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant for example in relation to the impact on learners of all forms of domestic abuse, including where they see, hear or experience it effects. Learners may be abused in a family or institutional or community setting by those known to them or, more rarely by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Learners may be abused by an adult or adults, or by another learner or learners.

Physical Abuse: a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a learner. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a learner.

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a learner or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on learners. These may include interactions that are beyond the learner's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing learners frequently to feel frightened or in danger or the exploitation or corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a learner, though it may occur alone.

Sexual Abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not, the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in a sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (see child on child abuse).

The sexual abuse of learners by other learners (child on child) is a specific safeguarding issue in education and all staff should be aware of it and the academy's process and procedure for dealing with this.

Neglect: Neglect 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. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

It may also be neglect of or unresponsiveness to a child's basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under-reported or unchallenged concern.

Financial and Material Abuse: This applies l to anyone at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.

Child Abduction and Community Safety Incidents: Staff are not permitted to remove or retain a learner without permission from the parent or anyone with legal responsibility. Staff also need to be aware that child abduction can be committed by people who are known to but not related to the learner such as neighbour, friend or acquaintance; and by strangers.

Community safety incidents would be in the vicinity of the academy which raise concerns such as adults loitering or engaging learners in conversation.

Substantial changed to CCE and CSE (easier to rewrite this section than amend)

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whichever form it takes, this is child abuse and relevant child protection procedures must be taken if modern slavery or trafficking is suspected as per ***Modern Slavery Act, 2015.***

It is known that different types of harm overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, it will be in exchange for:

- Something the victim wants or needs such as gifts, money, affection
- Will be of financial benefit or
- Other advantage, such as increased status, of the perpetrator or facilitator.

Exploitation can occur by both males and females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both CCE and CSE where children:

- Appear with unexplained gifts, money or new possessions which could also indicate that children have been approached by, or involved with, individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation
- Associate with other children involved in exploitation
- Suffer from changes in emotional well-being
- Misuse alcohol and other drugs
- Go missing for periods of time or regularly come home late, and
- Regularly miss school or education or do not take part in education

Any exploited learner will need additional support to help them remain in education.

CSE can be a ***one-off occurrence*** or a ***series of incidents*** over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Additional indicators that may be present in CSE are learners who:

. Have older boyfriends or girlfriends, or
. Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant

For further information, refer to: ***DfE guidance: Child sexual exploitation guide for practitioners***

County Lines (form of exploitation)

This is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of 'deal line'. This can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to move, sell (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are increasingly being targeted and recruited online using social media. They can become easily trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Some additional specific indicators that may be present where a learner is criminally exploited through the involvement in county lines are learners who may:

- Go missing from Reflections Training Academy, employment or home/supported living and are subsequently found in areas away from their home
- Have been the victim, perpetrator or alleged perpetrator of serious violence such as knife crime

- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs or exposed to techniques concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a **'trap house or cuckooing'** or hotel room where there is drug activity
- Owe a **'debt bond'** to their exploiters
- Have their bank accounts use to facilitate drug dealing **(money mulling)**

Any concerns regarding the above will be reported in line with local authority procedures and staff will recognise that learners are victims and should be supported as such.

Further information on the signs of a child's involvement in county lines is available in guidance published by the ***Home Office and The Children's Society County Lines Toolkit for Professionals***

Children and the Court System: At Reflections, we are aware that learners are sometimes required to give evidence in criminal court either for crimes committed against them or for crimes they have witnessed. Support will be provided by the DSL or DSO in agreement with the learner.

Honour or Faith-based Abuse (including female genital mutilation and forced marriage)

Encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Forced Marriage: Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both partied and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties). Some perpetrators use perceived cultural practices to coerce a person into marriage.

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at **The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)** School and college staff can contact the Forced Marriage Unit if they need advice or information: **Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.**

Female Genital Mutilation: This comprises all procedures that involve partial or removal of the external female genitalia or other injuries to female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon staff to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for staff to see visual evidence and they should not be examining learners, but the same definition of what is meant by "discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

We will follow our mandatory duty to report disclosures on FGM about a female under the age of 18 to the police.

Information on when and how to make a report can be found at: https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Domestic Abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Under the **statutory definition**, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Reflections recognise that exposure to domestic abuse and/or violence can have serious long term emotional and psychological impacts upon learners. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Reflections Training Academy understand learners can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young person, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both of the parties are under 16). However, as with any child under 18, where there are concerns about safety and welfare, child safeguarding procedures should be followed and both young victims and perpetrators should be offered support.

We will work with key partners and share information where there are concerns that domestic abuse may be an issue for a learner or be placing a learner at risk of harm

The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

National Domestic Abuse Helpline: Refuge runs the National Domestic Abuse Helpline, which can be called in confidence, 24/7 on **0808 2000 247.** Website provides guidance and support for potential victims, as well as anyone who is concerned. Form can be completed through which a safe time from the team for a call can be booked.

Operation Encompass: Operates in all police forces across England. It ensures when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key lead and in this case DSL for Bristol and DSO for Birmingham before the children are due to arrive the following day. This notification will inform us about the context of the incident and will include the voice of the child. The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information. We are aware that we must not do anything that puts the child or the non-abusing adult at risk.

Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents. Where appropriate, the police and/or academy should make a referral to local authority children's social care if there are concerns about a learner's welfare.

Advice and support line available for all staff members who are concerned about a child – available 8am – 1pm, Monday – Friday on 0204 513 9990

Child-on-Child Abuse (including harassment and violence)

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of the academy and online.

Staff should be clear on academy policy and procedure and the important role they play in preventing it and responding where they believe a learner may be at risk. It may be the case that just because there are no reported concerns, it does not mean that it is happening. Any concerns (whether they have taken place on or off site) should speak to the DSL/DSO.

It is essential that all staff understand the importance of challenging inappropriate behaviours between learners that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of just growing up" or "boys being boys" can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for learners and in worst case scenarios a culture that normalises abuse leading to learners accepting it as normal and not coming forward to report it.

All staff should be aware that child-on-child abuse is a safeguarding issue for both victim and perpetrator. As well as knowing how to respond to concerns, all staff should know that it is preventable. Knowing how to recognise behaviours and indicators of risk early, knowing that timely, evidence-based support can be key to preventing learners going on to commit abuse or violence.

Child-on-Child Abuse is most likely, but not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; this could include an online element which facilitates, threatens and/or encourages physical abuse.
- Serious physical assault and harm, or threat of harm with a weapon
- Sexual violence, such as rape, assault by penetration and sexual assault;

(this may include an online element that facilitates, threatens and/or encourages sexual violence)

- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent such as forcing some to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals, ŧ or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
  Consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated by AI such as deepfakes
- Initiation/hazing type violence and rituals which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

Further guidance can be found in Part 5, KCSIE and Annex A and via *UKCIS – Sharing* ***nudes and semi-nudes' advice for education settings.***

Further guidance and expert support in tackling harmful sexual behaviours for professionals can be accessed at https://swgfl.org.uk/harmful-sexual-behaviour-support-service/

Sexual violence and sexual harassment can occur between two **or more** children of any age and sex. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- **Harassment, Banter and Bullying:** While bullying between learners is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a learner's wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as the Academy operates a zero-tolerance approach. Misogynistic and Misandrist conversations: dismissing sexist or misogynistic behaviour between children as banter normalises abuse and can escalate to sexual harassment and violence. It can be an underlying driver for harmful sexual behaviour and child on child abuse. It is a specific online safety risk. Bullying can take many forms and includes:

- **Emotional**: Being excluded, tormented (e.g. hiding things, threatening gestures)
- **Physical**: Pushing kicking, punching or any use of aggression and intimidation.
- **Racial:** Racial taunts, use of racial symbols, graffiti, gestures.
- **Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.

- **Verbal:** Name-calling, spreading rumours, teasing.
- **Cyber:** All areas on the internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.

Cybercrime: Criminal activity committed using computers and/or the internet. It is broadly catergorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber-dependent' (crimes that can be committed only by using a computer).

Additional advice can be found at: https://www.ncsc.gov.uk/ and http://www.cyberchoices.uk/ https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf

Mental Health: This section has been substantially updated so needed a rewrite.
All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are well placed to observe learners' day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one; can identify learners who may be struggling with their mental health and contemplating suicide and offer support with vital early intervention. If a learner is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs.

These could include:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like, and
- Physical signs of self-harm or neglecting themselves

Not every learner who exhibits these behaviours is suicidal or has a mental health concern.

All staff should be aware of the actions required if a learner needs:

- Help urgently and is in danger – **call 999** or take them to A&E immediately
- Help but is not an emergency – **NHS 111 online** or call **111** and select mental health option

Adverse Childhood Trauma: Where children have suffered abuse and neglect, or other potentially traumatic childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key staff understand the impact this can have on day-to-day mental health, behaviour, attendance and progress. All staff at the point of induction, are asked to complete ACES training.

Homelessness: being homeless or at risk of homelessness presents a real risk to welfare. DSLs and DSOs should be aware of contact details and referral routes in Local Authority Housing so they can raise/progress concerns timely. Homelessness Reduction Act, 2017 places a new legal duty on councils so that anyone at risk of or homeless will have access to meaningful help including an assessment of their needs and circumstances, the development

of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The new duties shift the focus to early intervention and encourage those at risk to seek support as soon as possible, before facing a homelessness crisis. Recognition should be given that 16–17-year-olds could be living independently from parents or guardians, for example through exclusion from the family home and will require a different level of intervention and support.

The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation who may be homeless and/or require accommodation: https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets

The Prevent Duty and Channel

Reflections utilise the opportunity to have an **appendix** to the safeguarding policy to set out the **process and procedure for Prevent Duty.** Therefore, an expanded version of the information below can be found within this document.
Children may be susceptible to radicalisation into terrorism. Like protecting children from other forms of harms and abuse, protecting children from this risk is a key element of our all-round approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Extremism goes beyond terrorism and is defined in the Government Counter-Extremism Strategy as vocal or active opposition to fundamental British values including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. The calls for the death of armed forces are also considered extremism. Staff will be alert to changes in behaviour which may indicate that they require protection.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel that offer guidance and support with the aim of preventing activity that could be deemed as criminal. Terrorism is an action that endangers or causes serious violence to a person /people; causes serious property damage or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism.

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead or officer or a referral to prevent.

Channel: Voluntary, confidential support programme which focuses on providing support at an early stage to people who are susceptible to being drawn into terrorism. Prevent referrals are submitted and assessed through multi-agency panel and determine if the child is at risk of being drawn into terrorism and if support is needed.

18. Glossary of Terms

Care Act 2014 - This is a reformed law that related to the support and care for carers and adults. This act came into force in April 2015. Clauses 42-45 of this Act gives the statutory framework for protecting adults from abuse and neglect.
CIC – Child in care
CP – Child protection
CIN – Child in need
DBS - Disclosure and Barring Service. The DBS is a governmental body that was established in 2012 that carry Criminal records checks
DfE – Department for Education
DSL - Designated Safeguarding Lead
DSO – Designated Safeguarding Officer
UK-GDPR – United Kingdom -General Data Protection Regulation. Post Brexit UK adoption of EU Law on data protection and privacy for all individuals
HBV – Honour Based Violence
KCSiE – Keeping Children Safe in Education – DfE publication updated annually, 2026 most recent update
LAC – Looked after Child
LADO –Local Authority Designated Officer works within Children's Services and gives advice and guidance to employers, organisations and other individuals who have concerns about children and young people.
LSA – Local Safeguarding Arrangements
MARAC - is short for Multi-Agency Risk Assessment Conference and is a multi-agency forum of organisations. These organisations manage high-risk cases of honour-based violence, stalking and domestic abuse.
MASH –Multi-Agency Safeguarding Hub. This service is made up of Police, Adult Services, NHS and other organisations. MASH helps agencies to act quickly in a coordinated and consistent way. This means that the person at risk is kept safe
SCB – Safeguarding Children Board. Every local authority has its own Safeguarding Children Board. The Safeguarding Children Board operates on a multi-agency level and is often the first point of contact for any non-emergency safeguarding concerns
SEND – Special Education Need or Disability
WTSC – Working Together to Safeguarding Children

19. Local Authority LADO's

West Midlands

AUTHORITY NAME	LADO NAME	CONTACT NUMBER	CONTACT EMAIL	ADDRESS
Birmingham	LADO Team	0121 675 1669	Ladoteam@birminghamchildrenstrust.co.uk https://lscpbirmingham.org.uk/working-with-children/lado - New referral and advice form	PO Box 17340 BIRMINGHAM B2 2DR
Solihull	Kate Davies	07795128638	Lado@solihull.gov.uk Put LADO referral into the subject line https://westmidlands.procedures.org.uk/local-content/ygjN/lado-managing-allegations/?b=Solihull They should have a 'position of trust' form on the website	Solihull Local Safeguarding Child Protection and Review Unit Bluebell Centre Chelmsley Wood B37 5TN
Walsall	Belinda Crowshaw – LADO	07432 422 205 or 0300 555 2866 option 2 Evenings, weekends, bank holidays (out of hours) 0300 555 2922 or 0300 552 836	MASH@walsall.gov.uk Lado@walsall.gov.uk	Civic Centre 2nd Floor, Darnell Street Walsall, WS1 1TP
Walsall	Seona Baker – SG Education Coordinator	07951 819 648	Seona.baker@walsall.gov.uk	Civic Centre 2nd Floor, Darnell Street Walsall, WS1 1TP
Worcestershire	Family Front Door Team	01905 846 221	LADO@worcschildrenfirst.org.uk https://lcsportal.worcschildrenfirst.org.uk/web/portal/pages/lado - referral form	Social Services, PO Box 585, Worcester WR4 4AD
Sandwell	Lisa Burn	0121 569 4800	sandwell_lado@sandwellchildrenstrust.org SCSP_business@sandwell.gov.uk https://www.sandwellcsp.org.uk/key-safeguarding-issues/guidance/allegations-against-stafflado/ - referral form	Metsec Buildings, Broadwell Road, Oldbury, B69 4HE
Dudley	Yvonne Nelson-Brown or Sukhchadan Kaur	01384 813110 01384 813 006 General line: 01384 813 061 Out of office hours 0300 555 8574	allegations@dudley.gov.uk https://dudleysafeguarding.org.uk/children/professionals-working-with-children/management-of-allegations/ - referral form	

Coventry	MASH team	024 7678 8555 during office hours Monday – Friday (8:30am – 5pm Mon-Thurs and 8:30am – 4:30pm Fridays)	lado@coventry.gov.uk Coventry Safeguarding Children Partnership via email at cscptraining@coventry.gov.uk https://www.coventry.gov.uk/ladoreferral Please contact the Emergency Duty Team: 024 7683 2222 outside of these hours	Broadgate House Broadgate, Coventry CV1 1FS
Herefordshire	Terry Pilliner	01432 261739 or tpilliner@herefordshire.gov.uk	LADO@herefordshire.gov.uk - send referrals to this address https://westmidlands.procedures.org.uk/local-content/ygjN/lado-managing-allegations/?b=Herefordshire - referral form	Council Offices, Plough Lane Hereford, HR4 0LE
Shropshire	First point of contact	0345 678 9021. Out of office hours: 0345 6789040.	Further information is available on the Managing Allegations page of the SSCP website.	Shropshire Council Room GN94, Ground Floor Shirehall Abbey Foregate Shrewsbury SY2 6ND
Telford & Wrekin	Glen Harrison	01952 385385 option 1 01952 676500 (out of hours)	Glenn.Ashbrooke@telford.gov.uk https://webforms.telford.gov.uk/form/198	Addenbrooke House, Ironmasters Way, Telford, TF3 4NT
Wolverhampton	Paul Cooper	01902 550661 Children Safeguarding concerns - Tel: 01902 555392 (Mon-Thurs 8:30am - 5pm {4:30pm on Fridays}) or 01902 552999 (out of hours)	lado@wolverhampton.gov.uk Secure Email - cooper@wolverhampton.gcsx.gov.uk Non-secure Email - Cooper@wolverhampton.gov.uk http://www.wolverhamptonsafeguarding.org.uk/images/adults-and-children-shared-docs/Referral-Form-LADO--adult-safeguarding-April-2016.doc	Priory Green Building Whitburn Close Pendeford Wolverhampton WV9 5NJ
Staffordshire	First Response Team	Freephone: 0800 1313 126 (Monday to Thursday, 8.30am to 5pm and Friday 8.30am to 4.30pm) In an emergency outside office hours telephone 0845 6042 886	FirstR@staffordshire.gov.uk	Staffordshire Safeguarding Children Board Wedgwood Building Tipping Street Stafford ST16 2DH

Southwest Area

AUTHORITY NAME	LADO NAME	CONTACT NUMBER	CONTACT EMAIL	ADDRESS
Bristol	LADO	0117 903 7795 Emergency response team 01454 615 165 Text phone: 60066	https://bristolsafeguarding.org/children/lado-concerns-about-professionals lado@bristol.gov.uk	BSCB Safeguarding (CH) PO Box 3176 Bristol, BS3 9FS
Bath and Northeast Somerset (BAINES)	Victoria Harlin	01225 396810	https://bcssp.org.uk/assets/7a7eb990/managing_allegations_referral_form_lado.doc Email: LADO@bathnes.gov.uk	Child Protection Unit Bath & Northeast Somerset Council, Lewis House, Manvers Street, Bath, BA1 1JG
South Gloucestershire	Tina Wilson	01454 868508 For child concerns: 01454 866000 - Monday to Friday 01454 615165 - Out of hours/Weekends	LADO@southglos.gov.uk LADO hours are 10am –3pm Monday to Friday	South Gloucestershire Council
Somerset (Taunton learners)	Antony Goble and Stacey Davis and assistant, Julian Flack	sdinputters@somerset.gov.uk 0300 123 2224.	https://somersetsafeguardingchildren.org.uk/document/allegations-reporting-form/ (referral form for the LADO)	County Hall, The Crescent, Taunton, Somerset TA1 4DY
North Somerset	James McMillian	07795 092 692	lado@n-somerset.gov.uk https://nsscp.co.uk/professionals-practitioners/reporting-concerns-about-adult	North Somerset Council
Wiltshire (Trowbridge learners)	Wiltshire Multi-Agency Safeguarding Hub (Mash)	0300 4560108 option 6	LADO@wiltshire.gov.uk	Wiltshire Council