



Pebbles
EDUCATION

Safeguarding and Child Protection Policy
2026-2027

Pebbles Connect
Operated by Pebbles Care Ltd

Policy details

Policy	Safeguarding and Child Protection Policy
Applies to	Pebbles Connect
Policy owner	Head Teacher
Approved by	Head of Education
Version	1.0
Approval date	26 August 2026
Effective date	1 September 2026
Next review	August 2027 (or earlier if required)



Key safeguarding contacts

Status of KCSIE 2026: Keeping Children Safe in Education 2026 comes into force on 1 September 2026. Pebbles Connect adopts it as its principal safeguarding framework for English provision and as organisational practice across the service, subject to the law and safeguarding procedures applicable in the nation and local authority area where the child is located.

Where a child is in immediate danger or a crime is in progress, staff should FIRST contact the emergency services on 999 and then inform the DSL or DDSL as soon as possible.

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Contents

Key safeguarding contacts	3
Contents	4
1. Policy aims and Pebbles Connect context	8
2. Scope, status and legal framework	9
3. Safeguarding principles and terminology	10
3.1 Terminology	10
4. Governance and safeguarding leadership	11
4.1 Organisational accountability	11
4.2 DSL and DDSL	11
4.3 Availability and cover	12
5. Shared responsibilities with commissioners and care teams	12
6. Admission, safeguarding information and learning arrangements	13
6.1 Required information	13
6.2 Learning location and adult availability	13
7. Recognising abuse, neglect, exploitation and other safeguarding concerns	14
7.1 Physical abuse	14
7.2 Emotional abuse	14
7.3 Sexual abuse	14
7.4 Neglect	14
7.5 Professional curiosity in an online setting	14
8. Equality, vulnerability and children who may face greater risk	15
8.1 Lesbian, gay and bisexual children and children questioning their gender	15
8.2 Discriminatory and prejudiced behaviour	15
9. Responding to concerns and disclosures	16
9.1 When a child discloses	16
9.2 Immediate danger during online contact	16
9.3 Direct referrals and escalation by staff	16
10. Safeguarding records, CPOMS, confidentiality and information sharing	17
10.1 CPOMS	17
10.2 CPOMS outage	17
10.3 Confidentiality and access	17
10.4 Verification of external requests	18
10.5 Information-sharing decisions	18
10.6 Data breaches and subject access	18
11. Community-based Early Help, Family Help and multi-agency working	19
12. Attendance, absence, children missing education and children missing from home or care	19
12.1 Attendance definition and daily responsibility	19
12.2 First unexplained absence	20
	4

12.3 Persistent and prolonged absence	20
12.4 Children missing from home or care	20
12.5 Health-related absence	20
13. Child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence	21
13.1 Continuum-based assessment	21
13.2 Response and support	21
14. Making and sharing nudes and semi-nudes, including AI-generated imagery	22
15. Online safety, remote education, filtering and monitoring	22
15.1 Microsoft Teams and accounts	22
15.2 Live teaching and recording	23
15.3 Cameras and online presentation	23
15.4 Staff working remotely	23
15.5 Filtering and monitoring	24
15.6 Mobile phones	24
15.7 Generative AI	24
16. Mental health, self-harm, suicide risk and bereavement	25
16.1 Self-harm and suicidal thoughts	25
16.2 Return to learning	25
16.3 Bereavement and traumatic loss	25
16.4 Staff support	26
17. Specific safeguarding issues	26
17.1 Child criminal exploitation and county lines	26
17.2 Child sexual exploitation	26
17.3 Serious violence, gangs and weapons	26
17.4 Modern slavery and trafficking	26
17.5 Domestic abuse and teenage relationship abuse	26
17.6 Child-to-parent or caregiver abuse	27
17.7 Female genital mutilation	27
17.8 Forced marriage and honour-based abuse	27
17.9 Prevent and radicalisation	27
17.10 Homelessness, housing insecurity and temporary accommodation	27
17.11 Private fostering	27
17.12 Family imprisonment and young carers	28
17.13 Fabricated or induced illness	28
17.14 Faith, belief and spiritual-practice abuse	28
17.15 Substance use	28
18. SEND, looked-after children, medical needs and adult safeguarding	28
18.1 SEND and communication needs	28
18.2 Looked-after and previously looked-after children	29

18.3 Medical conditions	29
18.4 Learners aged 18 and over	29
19. Clinical and therapeutic services and confidentiality	29
19.1 Confidentiality	29
20. In-person activity, educational visits, sport and residential experiences	30
20.1 External providers and venues	30
20.2 Sport	30
20.3 One-to-one contact	30
20.4 Transport	30
20.5 Restrictive intervention and reasonable force	30
20.6 Searching bags and confiscation	31
20.7 Personal and intimate care	31
20.8 Medication and first aid	31
20.9 Residential experiences	32
21. Visitors, guest speakers and external professionals	32
22. Allegations and safeguarding concerns about adults	32
22.1 Harm threshold	32
22.2 Case managers and LADO contact	33
22.3 External professionals and adults in other Pebbles services	33
22.4 Managing the investigation	33
23. Low-level concerns, professional boundaries and whistleblowing	34
23.1 Low-level concerns	34
23.2 Professional boundaries	35
23.3 Whistleblowing	35
24. Safer recruitment and the Single Central Record	35
25. Training, safeguarding education and student voice	36
25.1 Staff induction and training	36
25.2 Student safeguarding education	36
25.3 Parent, carer and supervising-adult information	36
25.4 Student voice	37
26. Complaints and safeguarding	37
27. Quality assurance, governance reporting and policy review	37
28. Records retention and transfer	38
29. Related policies	39
References and government guidance	40
Appendix A. Safeguarding reporting flowchart	41
Appendix B. Allegations and low-level concern escalation routes	42
B1. Allegations or concerns that may meet the harm threshold	42
B2. Low-level concerns	42

Appendix C. Core indicators of abuse and neglect	43
Physical abuse	43
Emotional abuse	43
Neglect	43
Sexual abuse	43
Indicators involving parents, carers and the home environment	43
Revision history	44

1. Policy aims and Pebbles Connect context

Pebbles Connect is an online education provision operated by Pebbles Care Ltd. The service provides commissioned education for children and young people who may be unable to attend a physical, mainstream or conventional education setting. During 2026-27, provision is primarily for secondary-age learners from Year 7/S1 to Year 13/S6. Future provision may include younger learners.

Students normally remain on roll with a local authority, school or other commissioning organisation. Pebbles Connect therefore works within a shared safeguarding arrangement. The commissioner retains its own safeguarding duties, while Pebbles Connect has direct responsibility for safeguarding during its provision and for acting on concerns that come to its attention. The arrangements in this policy apply to online teaching, pastoral work, therapeutic work arranged through the service, in-person activities, visits, residential experiences and contact with external providers.

The policy aims to provide a child-centred, trauma-informed and relational approach in which staff recognise that adversity, disrupted education, disability, additional needs and previous experiences of services can affect communication, engagement and help-seeking. The welfare of the child remains central to decision-making. Safeguarding and promoting the welfare of children includes early help and support, protection from maltreatment inside or outside the home and online, prevention of impairment to health or development, safe and effective care, and action to support positive outcomes. (Department for Education, 2026a; Department for Education, 2026b).

Within this context, this policy aims to:

- provide clear routes for reporting and responding to concerns without delay;
- ensure safeguarding responsibility is understood across Pebbles Connect and Pebbles Care Ltd;
- set expectations for joint working with commissioners, parents, carers, care teams and statutory agencies;
- recognise risks that can be harder to observe in online education and use professional curiosity when patterns or changes emerge;
- provide clear arrangements for online safety, safeguarding records, information sharing, attendance and case review;
- support safe practice during face-to-face activities and work with external professionals; and
- maintain effective oversight, training, review and accountability.

Throughout this policy, the term “parent or carer” is used to refer to any person who has a significant caring responsibility for a child or young person, regardless of their formal title or relationship to the child.

2. Scope, status and legal framework

This policy applies to all Pebbles Connect employees, leaders, agency staff, contractors, consultants, therapeutic professionals, visitors and other adults who have contact with Pebbles Connect students or access to safeguarding information. Staff must follow this policy across online and in-person activity.

For safeguarding purposes, a child is anyone under the age of 18. Where a Pebbles Connect learner is aged 18 or over, adult safeguarding arrangements apply alongside this policy and relevant Pebbles Care procedures. The DSL or DDSL will coordinate with the local authority adult safeguarding service and other professionals for the learner's location. A learner who turns 18 during a placement will have safeguarding, consent and information-sharing arrangements reviewed.

Keeping Children Safe in Education 2026 (KCSIE 2026) is statutory guidance for schools and colleges in England and comes into force on 1 September 2026. Pebbles Connect is operated by Pebbles Care Ltd and is not described in this policy as a separately registered school. Pebbles Connect adopts KCSIE 2026 as its principal safeguarding framework for English provision and applies its principles across the service where suitable. Legal duties and national or local safeguarding procedures applicable to the child's physical location take precedence where they differ. (Department for Education, 2026a).

For children in England, practice is informed by KCSIE 2026, Working Together to Safeguard Children 2026, local safeguarding partnership procedures and other current Department for Education and Home Office guidance. For children elsewhere in the UK, the DSL and DDSL must use the legally applicable procedures and terminology for that nation and local area. Principal national sources include the National Guidance for Child Protection in Scotland 2021, updated 2023; Keeping Learners Safe and the Wales Safeguarding Procedures; and Co-operating to Safeguard Children and Young People in Northern Ireland. (Scottish Government, 2023; Welsh Government, 2022; Department of Health Northern Ireland, 2017, updated 2026).

Where the correct jurisdiction, referral route or threshold is uncertain, the DSL or DDSL will seek advice from the relevant local authority, safeguarding partnership or national service. Uncertainty must never delay urgent protective action.

Relevant legislation and guidance includes, where applicable, the Children Acts 1989 and 2004, Education Act 2002, Equality Act 2010, Human Rights Act 1998, Data Protection Act 2018, UK GDPR, Data (Use and Access) Act 2025, Counter-Terrorism and Security Act 2015, Female Genital Mutilation Act 2003, Sexual Offences Act 2003, Modern Slavery Act 2015, Children's Homes (England) Regulations 2015 and Children's Wellbeing and Schools Act 2026. Legal references in this policy should be read with current amendments and local procedures.

3. Safeguarding principles and terminology

Safeguarding is everyone's responsibility. Every member of staff has a duty to provide a safe learning environment, recognise concerns, share information and take prompt action. Staff should maintain an attitude that safeguarding concerns can arise in any family, setting or community. (Department for Education, 2026a). Staff should maintain a consistent 'professional curiosity' in their practice.

In applying this policy, Pebbles Connect will be guided by the following safeguarding principles:

- Children should be heard, understood and treated with dignity.
- Children may not recognise that an experience is harmful or may not feel ready or able to disclose it. Lack of disclosure does not remove the need for professional curiosity.
- Concerns may arise from a single serious event, a pattern of smaller observations, information from another person or changes in attendance, mood, behaviour, appearance, communication or learning engagement.
- Abuse and exploitation may occur inside or outside the home, in the community, online, in intimate relationships or between children.
- Identity, disability, communication needs, language, care experience, discrimination and previous experiences of professionals may affect how a child communicates or seeks help.
- Parents and carers will normally be involved in safeguarding decisions unless doing so could increase risk, impede an investigation or conflict with advice from statutory agencies.
- Staff must record and report concerns even where they are uncertain about significance. The DSL or DDSL will consider the wider safeguarding picture.

3.1 Terminology

The term "child-on-child abuse" is used for abuse between people under 18, irrespective of whether they are the same age or part of the same peer group. KCSIE 2026 uses "victim" and "alleged perpetrator" in places, while recognising that children may prefer other language. Pebbles Connect staff will use language that is respectful and suitable for the individual child and circumstances. (Department for Education, 2026a).

The phrase "making or sharing nudes and semi-nudes" includes photographs, videos, live streams and images that are digitally altered or wholly generated through artificial intelligence. (Department for Education, 2026a; UK Council for Internet Safety, 2024).

4. Governance and safeguarding leadership

4.1 Organisational accountability

Pebbles Connect operates within Pebbles Care Ltd. The Chief Executive Officer (CEO) holds senior executive organisational governance responsibility. The Pebbles Care Ltd board provides ultimate organisational oversight and board-level scrutiny and assurance. The Head of Education is the formal approver of this policy.

The Pebbles Care Ltd board will receive safeguarding and child-protection assurance and regular updates. At least annually, the Pebbles Care Ltd board will receive a documented safeguarding review from the Head Teacher/DSL. The review will consider compliance, training, records, online safety, attendance, referrals, allegations, previous audit actions and areas requiring action. A sample of anonymised or appropriately redacted CPOMS records will be reviewed to consider the quality, timeliness and consistency of recording. Direct unrestricted access to CPOMS is not expected for routine board assurance. (Department for Education, 2026a).

Serious safeguarding incidents or significant practice failures will be escalated promptly through the internal escalation route: Head Teacher/DSL, Head of Education/DDSL, Chief Operating Officer (COO), Chief Executive Officer (CEO) and Pebbles Care Ltd board, using the next appropriate person in the route where required. Staff must not wait for routine reporting cycles where immediate senior oversight is needed.

4.2 DSL and DDSL

The Head Teacher is the Designated Safeguarding Lead (DSL). The Head of Education is the Deputy Designated Safeguarding Lead (DDSL). The DDSL may carry out delegated safeguarding functions, while the DSL retains lead responsibility for Pebbles Connect safeguarding. Both must have sufficient time, authority, training, resources and access to senior leadership to carry out their roles. DSL and DDSL training will be refreshed at least every two years, with knowledge updates at least annually and whenever guidance or local practice changes. (Department for Education, 2026a).

The DSL and DDSL are responsible for the following safeguarding functions:

- lead and coordinate safeguarding referrals and case management;
- advise and support staff who raise concerns;
- work with commissioners, care teams, parents, carers and statutory agencies;
- maintain and review safeguarding records and chronologies;
- ensure the child's wishes and feelings are considered;
- oversee online safety, filtering and monitoring with QLineIT;
- coordinate Prevent responsibilities, with the DSL as Prevent lead and the DDSL providing cover;
- ensure safeguarding information is transferred securely at transitions;
- lead safeguarding training, induction and policy implementation; and
- report safeguarding assurance information to Pebbles Care Ltd leadership and the board.

The DSL and DDSL will hold a safeguarding and case-review meeting every week. Open cases, new concerns, actions due, patterns, escalation, external-agency response and closure will be considered. High-risk or rapidly changing cases will be reviewed more frequently where needed.

4.3 Availability and cover

A DSL or DDSL should be available to staff during service activity. Where the DSL is unavailable, the DDSL provides safeguarding cover. If both are unavailable for an urgent concern, the Chief Operating Officer (COO) is the next internal escalation point. The DSL is the out-of-hours safeguarding contact unless another arrangement is communicated.

Pebbles Connect will maintain a confidential safeguarding shared mailbox accessible to the DSL and DDSL. The mailbox supports continuity when one safeguarding lead is unavailable and must be monitored so that concerns are acted upon without delay. Urgent and high-risk concerns must still be communicated by telephone. (Department for Education, 2026a, para. 127 and Annex B).

5. Shared responsibilities with commissioners and care teams

Students normally remain on roll with a commissioning school, local authority or other organisation. Commissioning does not transfer all safeguarding responsibility to Pebbles Connect. The commissioner retains its own safeguarding duties, and Pebbles Connect accepts responsibility for safeguarding within its provision and for concerns that become known to its staff.

Before a placement begins, the commissioner must provide a named DSL or equivalent, current contact details and sufficient safeguarding, risk, attendance, SEND, health and care information for Pebbles Connect to assess whether the placement can operate safely. The commissioning or placement agreement should set out shared responsibilities for safeguarding communication, attendance, referrals, changes in circumstances and information transfer.

These shared safeguarding responsibilities will be put into practice through the following arrangements:

- Pebbles Connect will inform the commissioner's DSL or lead of safeguarding concerns concerning their student, subject to any restriction imposed by police, children's social care or another statutory agency.
- The commissioner, parents, carers and relevant care staff are expected to share significant changes in safeguarding circumstances promptly.
- Pebbles Connect will seek confirmation of action where a concern is passed to a commissioner and will follow up when a response is delayed or appears insufficient.
- Where urgent action is required and the commissioner cannot be reached, the Pebbles Connect DSL or DDSL may make a direct statutory referral or contact emergency services and will inform the commissioner as soon as possible.
- Where a placement is declined or ended because needs cannot be met safely, Pebbles Connect will document the reason, communicate it to the commissioner and ensure a clear safeguarding handover.
- Open safeguarding matters remain actively managed until responsibility has been clearly transferred and receipt acknowledged.

KCSIE 2026 reinforces shared safeguarding responsibility where schools work with third-party organisations. Pebbles Connect applies the same principle to commissioned provision. (Department for Education, 2026a).

6. Admission, safeguarding information and learning arrangements

Sufficient safeguarding, risk and medical information is a condition of full enrolment. The Head Teacher/DSL will review available information before the student starts. A start date may be delayed where missing information prevents a safe assessment of the placement. Where needs cannot be met safely, Pebbles Connect will inform the commissioner and record the decision and any proposed alternatives.

6.1 Required information

Pebbles Connect will obtain and maintain the following information for each student, where applicable:

- current home address and usual learning location;
- at least two emergency contacts;
- a named adult normally responsible at the usual learning location and contactable during learning hours;
- commissioner DSL or safeguarding lead details;
- current social worker and other key professional details where applicable;
- child protection, child in need, looked-after or equivalent safeguarding status;
- relevant risk assessments, care plans and safety plans;
- EHCP, Co-ordinated Support Plan, Individual Development Plan or equivalent information relevant to safety and access;
- GP details, significant medical conditions, allergies, intolerances, medication and emergency health information; and
- any information relevant to online safety, exploitation, missing episodes, behaviour, mental health or current statutory involvement.

Parents, carers, care staff and commissioners must notify significant changes promptly. Pebbles Connect will request a formal update of core details at least annually and may request an earlier review after an incident, change in circumstances or safeguarding concern.

6.2 Learning location and adult availability

The student's usual learning location will be recorded and assumed unless an update is provided. Temporary changes should be notified where possible, particularly where the student is learning in a different household, care setting or other location.

For students under 16, an appropriate responsible adult should normally be available nearby and contactable during learning hours. The adult does not have to remain in the room. Where a student appears to be learning alone, teaching can continue where the teacher considers this safe. The teacher will record the observation on CPOMS. The DSL or DDSL will review the circumstances and may contact the parent, carer or supervising adult. A repeated pattern will prompt a formal discussion with the responsible adults and commissioner and may require an updated placement or safeguarding risk assessment. Learning alone is assessed in context, considering the student's age, maturity, vulnerability and wider circumstances.

7. Recognising abuse, neglect, exploitation and other safeguarding concerns

All staff must understand the four main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. Staff should also recognise exploitation, domestic abuse, harmful behaviour between children, modern slavery and other risks described in this policy. Abuse, neglect and exploitation often overlap. Technology may form part of abuse that also occurs offline. (Department for Education, 2026a).

7.1 Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also occur where a parent or carer fabricates or deliberately induces illness in a child. Staff should report unexplained or repeated injuries, inconsistent explanations, concerning physical interactions or information suggesting physical harm.

7.2 Emotional abuse

Emotional abuse is persistent emotional maltreatment that causes severe and adverse effects on emotional development. Examples include persistent criticism, humiliation, belittling, rejection, intimidation, coercive or controlling behaviour, deliberately silencing a child, inappropriate expectations, overprotection, serious bullying and exposure to the ill-treatment of others. Staff should consider changes in confidence, mood, relationships, communication, anxiety, withdrawal, aggression and help-seeking alongside the wider context. (Department for Education, 2026a).

7.3 Sexual abuse

Sexual abuse includes forcing or enticing a child to take part in sexual activity, with or without physical contact, and whether or not the child understands what is happening. Abuse may include rape, assault by penetration, sexual touching, masturbation, involving children in sexual imagery, sexual activity or sexualised behaviour, grooming and technology-facilitated abuse. Sexual abuse can be committed by adults or children of any sex or gender. (Department for Education, 2026a).

7.4 Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, with serious impact or likely serious impact on health or development. Concerns may relate to food, clothing, shelter, safe supervision, medical care, emotional care, education or a safe living environment. Online education can reduce direct observation of some indicators, so staff should combine information from attendance, presentation, communication, engagement, background interactions and known circumstances.

7.5 Professional curiosity in an online setting

Staff should remain alert to inconsistencies, sudden changes, repeated patterns and background information that may indicate harm. Appropriate, open questions may be used to clarify immediate welfare. Staff should avoid investigative questioning. Where an explanation does not resolve concern, staff should record and report the concern to the DSL or DDSL.

Indicators that may warrant further consideration, particularly where they form part of a pattern or are accompanied by other concerns, include:

- changes in attendance, punctuality or unexplained absence;
- sudden changes in mood, communication, relationships or engagement;
- changes in appearance, self-care, injuries or visible distress;
- a marked change in camera use when considered with other concerns;
- concerning statements, messages, searches or online behaviour;
- concerning interactions, threats, arguments or activity seen or heard in the background;

- repeated lack of supervision or support where this creates risk;
- indications of hunger, untreated health needs, unsafe accommodation or disrupted sleep; and
- comments suggesting coercion, exploitation, abuse, self-harm or fear.

A concerning incident seen or heard during a live session should be reported immediately. Staff should keep the child engaged where possible while urgent action is coordinated.

8. Equality, vulnerability and children who may face greater risk

Safeguarding practice must recognise the additional barriers some children experience. Pebbles Connect will consider the individual child's circumstances and avoid assumptions based on identity, diagnosis, care status, family background or behaviour. Working Together 2026 places stronger attention on inclusive and anti-discriminatory practice and on challenging racism and discrimination. (Department for Education, 2026b).

Children who may face additional safeguarding risks or barriers to recognition, disclosure or support include:

- children with SEND, disabilities, medical conditions or communication needs;
- children with mental health needs;
- children who are looked after, previously looked after or known to social care;
- young carers;
- children affected by parental offending or imprisonment;
- children experiencing homelessness, temporary accommodation or housing insecurity;
- children who have experienced repeated exclusion, disrupted education or alternative provision;
- children at risk of exploitation, trafficking, modern slavery, serious violence or radicalisation;
- children affected by domestic abuse or abuse within their own intimate relationships;
- children who are lesbian, gay or bisexual, and children questioning their gender;
- children affected by racism, faith-based prejudice, sexism, misogyny, misandry, homophobic, biphobic or transphobic abuse, ableism or other discrimination; and
- children whose first language is not English or who have other barriers to communicating concerns.

8.1 Lesbian, gay and bisexual children and children questioning their gender

Some children who are lesbian, gay or bisexual, and children who are questioning their gender, may face bullying, isolation, discrimination, online abuse or barriers to seeking help. Staff should respond sensitively to the individual child, protect confidentiality on a need-to-know basis and report safeguarding concerns through the normal route. Requests or concerns involving social transition, privacy, changing arrangements, toilets, sport or other safeguarding issues will be considered individually by the DSL or DDSL with reference to the law and current guidance applicable to the child's location. For provision in England, KCSIE 2026 and the Equality Act 2010 will inform decisions where applicable. (Department for Education, 2026a).

8.2 Discriminatory and prejudiced behaviour

Sexism, misogyny, misandry, racism, faith-based prejudice and other discriminatory behaviour can form part of a safeguarding concern where it contributes to harassment, abuse, intimidation, coercion or an unsafe environment. Staff should record serious, repeated or targeted behaviour on CPOMS and use the Behaviour Policy where appropriate. Safeguarding action takes priority where the risk reaches safeguarding thresholds.

9. Responding to concerns and disclosures

Any staff member who has a concern about a child's welfare must act promptly. The DSL should be contacted in the first instance. The DDSL provides cover when the DSL is unavailable. Urgent or high-risk concerns require immediate telephone contact. A CPOMS record should be made as soon as possible. (Department for Education, 2026a).

9.1 When a child discloses

When a child makes a disclosure or shares information that may indicate a safeguarding concern, staff should:

- listen carefully and allow the child to speak at their own pace;
- remain calm and take the child seriously;
- use open and limited questions only where needed to understand immediate safety;
- **do not investigate**, test the account or ask leading questions;
- do not promise secrecy or confidentiality;
- explain in age-appropriate language that information may need to be shared to help keep them or someone else safe;
- record the child's own words where possible and distinguish the child's account from staff observation or opinion;
- inform the DSL or DDSL promptly; and
- explain what is likely to happen next, as far as this can safely be shared.

A child may ask that no action is taken or that parents are not told. The child's wishes and feelings will be considered. Protective action may still be required where there is risk of harm to the child or another person.

9.2 Immediate danger during online contact

Where a child appears to be in immediate danger during a live lesson, pastoral session or therapeutic session, the member of staff should maintain contact where possible and notify the DSL or DDSL immediately. The DSL or DDSL will coordinate contact with the responsible adult, care staff, emergency services, police or local statutory service as required. Where the child disconnects and cannot be re-contacted, the same urgent escalation applies and a welfare check may be requested.

9.3 Direct referrals and escalation by staff

The normal Pebbles Connect route is for staff to report to the DSL or DDSL so that information can be coordinated consistently. Where neither safeguarding lead is available, the concern is urgent, or a staff member believes internal action is inadequate, the staff member may seek advice or make a direct referral to the relevant statutory service. Staff must inform the DSL or DDSL as soon as practical. Whistleblowing routes remain available where a safeguarding failure is not being addressed.

10. Safeguarding records, CPOMS, confidentiality and information sharing

10.1 CPOMS

CPOMS is the principal safeguarding and welfare record for Pebbles Connect. Teaching and pastoral staff will have individual access and training to submit concerns. The DSL and DDSL will have access to the full safeguarding history. Other staff will receive information on a need-to-know basis.

Safeguarding records on CPOMS should be managed in accordance with the following expectations:

- Concerns should be recorded without delay, with the date, time, context and name of the reporting person.
- Records must be factual, clear and attributable, and must distinguish observed fact, professional opinion and third-party information.
- Where a disclosure is made, the child's own words should be recorded where possible.
- All significant discussions, decisions, referrals, advice, actions and outcomes should be recorded, including the reason for a decision to refer or not to refer.
- Errors must be corrected through a later clarification or amendment so that the original audit trail remains.
- Open cases should contain clear actions, responsible persons and review points.
- Child-specific actions arising from the weekly safeguarding review should be added to the child's CPOMS record.
- The DSL closes an active case when actions are complete, external involvement has concluded or transferred, and the closure rationale is recorded. The DDSL may close a case during the DSL's absence.
- A closed case may be reopened when new information concerns the same underlying issue. A different concern should be recorded as a new concern within the child's overall chronology.

KCSIE 2026 requires concerns, discussions, decisions and the reasons for decisions to be recorded in writing and kept securely. (Department for Education, 2026a).

10.2 CPOMS outage

Where CPOMS is unavailable, the reporting member of staff must send a factual report through the dedicated safeguarding shared mailbox and telephone the DSL or DDSL where the concern is urgent. The reporting staff member will add the concern retrospectively to CPOMS once service is restored, noting that the initial report was made, via email and telephone, during a system outage.

10.3 Confidentiality and access

Safeguarding information is confidential and shared on a need-to-know basis. Staff must not download, copy, print or store safeguarding information outside approved Pebbles systems without a clear professional need and authorisation. Safeguarding information must never be stored in personal email, personal cloud storage or on a personal device. Identifiable case discussions should not take place in public or informal communication channels. Wherever possible, the initials of the student should be used instead of their full name. This is particularly important in easily seen text such as subjects lines of emails and file names.

External written communication must use approved Pebbles systems and verified organisational addresses. Where the recipient does not have an equivalent secure system, information should be encrypted or password-protected where suitable, with the password sent separately. Requests from personal email domains should not be used as the sole basis for sharing sensitive safeguarding information.

10.4 Verification of external requests

Where information is requested by telephone, staff must verify the identity and role of the caller before sharing. The request and shared information should normally be confirmed through an official organisational email. Where identity or legitimacy is uncertain, information will be withheld until independent verification is completed. The request, verification steps, information shared and reason should be recorded on CPOMS where the request concerns an identifiable student.

10.5 Information-sharing decisions

When deciding whether to share safeguarding information, the DSL or DDSL will consider the purpose of sharing, the level of risk, who needs the information, the minimum relevant detail and the possible consequences of sharing or withholding it. The decision and rationale will be recorded. Data protection law does not prevent proportionate information sharing for safeguarding. (Department for Education, 2024; Department for Education, 2026a).

Relevant information may be shared without consent where this is necessary and proportionate to protect a child or another person. Parents and carers will normally be informed about a referral or significant safeguarding sharing unless this could increase risk, impede an investigation or conflict with advice from police, children's social care or another statutory agency.

From 30 September 2026, a new information-sharing duty introduced by the Children's Wellbeing and Schools Act 2026 is expected to apply to relevant organisations in England. Pebbles Care Ltd will review this section promptly against the final statutory guidance and will apply the duty where it is legally applicable to the organisation or provision.

10.6 Data breaches and subject access

Any suspected safeguarding data breach must be reported immediately through the Pebbles Care Ltd data-breach procedure and to the DSL. The Data Protection Officer or equivalent will assess notification and mitigation requirements. Where the breach concerns an identifiable Pebbles Connect student, relevant safeguarding impact and action will be recorded on CPOMS.

Requests by a parent, carer or student for access to safeguarding information will be handled through the formal Pebbles Care Ltd data-protection or subject-access process. Information may require redaction or lawful withholding to protect the child, another person, confidential third-party information or an active investigation.

11. Community-based Early Help, Family Help and multi-agency working

KCSIE 2026 and Working Together 2026 distinguish universal services and community-based Early Help from targeted early help delivered through Family Help. Family Help may combine targeted early help and section 17 support within a coordinated plan. Pebbles Connect will use this terminology for English cases and equivalent local terminology elsewhere in the UK. (Department for Education, 2026a; Department for Education, 2026b).

The DSL leads Pebbles Connect involvement in community-based Early Help and Family Help, with the DDSL providing cover. Parents or carers and the child will normally be involved in planning and consent where appropriate. Where seeking consent could create risk or prevent protective action, the DSL will seek advice and act under the relevant safeguarding framework.

Pebbles Connect will apply the following principles when contributing to Early Help, Family Help and wider multi-agency safeguarding arrangements:

- early support should be considered where needs emerge before statutory thresholds are reached;
- plans, actions, review dates and outcomes relevant to Pebbles Connect should be recorded on CPOMS;
- where support is ineffective, risk increases or new information emerges, the DSL will reconsider statutory referral;
- The DSL will attend or provide information to child protection conferences, core groups, strategy discussions, Family Help meetings or equivalent multi-agency processes; the DDSL will provide cover;
- Pebbles Connect will follow up referrals where acknowledgement or action is not received within expected local timescales and use local escalation procedures where required; and
- local authority threshold documents and referral protocols for the child's location will guide statutory referrals.

For England, local authority children's social care should normally acknowledge a referral and decide next steps within one working day. The referrer should follow up where this information is not received. (Department for Education, 2026a; Department for Education, 2026b).

12. Attendance, absence, children missing education and children missing from home or care

Attendance and absence are safeguarding issues as well as educational issues. Repeated or prolonged absence can indicate abuse, neglect, exploitation, poor mental health, unmet SEND, housing instability, family difficulty or disengagement. Pebbles Connect will follow its Attendance Policy alongside this section and, where relevant, current statutory attendance and children missing education guidance. (Department for Education, 2026c; Department for Education, 2025a).

12.1 Attendance definition and daily responsibility

For Pebbles Connect, attendance includes participation in a scheduled live Microsoft Teams session or attendance at an approved in-person educational, therapeutic, psychological, outdoor-education or other agreed activity. The member of staff delivering the session records attendance. The DSL has overall daily attendance oversight and will follow up missing registers with staff.

12.2 First unexplained absence

Where a student does not attend the first scheduled online session of the day and no explanation has been provided, the student's assigned key person will contact the parent, carer or responsible adult that day. At least two contacts should be held for each student. If no contact can be established, the key person will continue reasonable attempts and inform the DSL where the absence or inability to contact responsible adults raises concern.

Where a child lives in a Pebbles Care residential setting, relevant care staff are expected to be contactable. For other students, failure to contact responsible adults should be considered alongside the child's known risk profile. Police or another welfare-check route may be used where the circumstances indicate immediate safety concerns.

12.3 Persistent and prolonged absence

Repeated or persistent unexplained absence will be escalated to the DSL for safeguarding review. Five or more consecutive days without prior notification will trigger contact with the commissioner DSL or lead and relevant Pebbles Care residential staff. A lower threshold will be used where existing risks make earlier action necessary.

For a non-looked-after child, 10 consecutive unauthorised days will trigger the formal children missing education process within Pebbles Connect, led by the DSL with the DDSL providing cover. Pebbles Connect will continue attempts to establish whereabouts and maintain liaison with the commissioner, parents or carers and agencies while the case is unresolved. The placement will remain open until the commissioner or relevant local authority confirms next steps.

For a looked-after child, any unexpected absence that raises concern requires immediate action. Pebbles Connect will notify the commissioner's safeguarding lead, the child's social worker and relevant local-authority or virtual-school contact without waiting for the five-day or ten-day thresholds. Statutory attendance and CME duties remain with the registered school or relevant local authority, while Pebbles Connect supplies timely information and takes safeguarding action within its role.

12.4 Children missing from home or care

Where a Pebbles Connect student is known or suspected to be missing from home or care, Pebbles Connect will support the response led by care staff, social work, police and other agencies. The DSL will coordinate the education contribution. If a missing student logs into a lesson or contacts staff online, the staff member should keep the child engaged where possible and immediately contact the DSL or DDSL. Staff should avoid alerting the child to any planned police or agency response where doing so could cause the child to disengage or increase risk.

Following a return, Pebbles Connect will consider relevant information from return-home interviews, risk assessments or professional meetings when planning educational support and safety arrangements.

12.5 Health-related absence

Where absence is sustained because of physical or mental health needs, the DSL will coordinate with the commissioner, parent or carer, care team and relevant health professionals to support safe education and reasonable adjustments. Medical absence must still be reviewed for safeguarding concerns where the pattern, explanation or wider circumstances create concern.

13. Child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence

Child-on-child abuse can occur online or offline, inside or outside Pebbles Connect activity, and between children who have never met in person. Staff must report concerns regardless of where the behaviour occurred if it affects a Pebbles Connect student. Absence of reports does not mean abuse is absent. (Department for Education, 2026a).

Child-on-child abuse may take a range of forms, including:

- bullying and cyberbullying, including prejudice-based and discriminatory bullying;
- abuse within intimate personal relationships between children;
- physical abuse and serious violence, including threats involving weapons;
- sexual violence and sexual assault;
- sexual harassment, sexual comments, sexual jokes and online sexual harassment;
- coercing someone to engage in sexual activity;
- making or sharing nudes and semi-nudes, consensually or non-consensually;
- upskirting;
- initiation or hazing behaviour; and
- online abuse through messaging, social media, gaming, group chats, AI tools or other platforms.

Staff must not dismiss abusive behaviour as banter, humour or a normal part of growing up. Serious, targeted, sexualised or discriminatory behaviour will be treated as a safeguarding concern and may also be addressed through the Behaviour Policy.

13.1 Continuum-based assessment

KCSIE 2026 describes harmful sexual behaviour, sexual harassment and sexual violence across a continuum. Pebbles Connect will consider the nature, frequency, severity, context, developmental stage, pattern and possible escalation of behaviour. A single incident may require significant action where seriousness warrants it. Repeated lower-level behaviour may show a developing pattern and must be reviewed in context. (Department for Education, 2026a, Part Five).

13.2 Response and support

All child-on-child safeguarding concerns should be recorded on CPOMS and reviewed by the DSL or DDSL. The harmed child and the child alleged to have caused harm may both need safeguarding support. Separate safety or risk plans may be required. The wishes and feelings of the harmed child should be heard. The account and needs of the alleged harming child should also be considered without compromising the safety or voice of the harmed child.

Where necessary, Pebbles Connect will separate children through online access controls, timetable changes, in-person arrangements or other measures. Any changes should be proportionate and should avoid placing an unfair educational burden on the harmed child. Parents or carers of both children will normally be informed unless doing so could increase risk or conflict with police, social-care or other agency advice.

Serious sexual violence or harmful sexual behaviour requires an immediate safeguarding and risk assessment by the DSL or DDSL, with consideration of children's social care and police involvement under KCSIE 2026 and local procedures.

14. Making and sharing nudes and semi-nudes, including AI-generated imagery

All incidents involving the making or sharing of nudes and semi-nudes by children require a safeguarding response. This includes consensual and non-consensual sharing, digitally altered images, deepfakes and wholly AI-generated sexual imagery depicting a child. (Department for Education, 2026a; UK Council for Internet Safety, 2024).

When an incident involving the making or sharing of nudes or semi-nudes comes to the attention of staff, the following procedures must be followed:

- Staff must report the incident immediately to the DSL or DDSL.
- Staff must not ask a child to forward, copy, download, screenshot or repeatedly show the image.
- Staff should avoid viewing the image. The DSL or DDSL may decide that viewing is necessary in an exceptional safeguarding situation and will record the reason.
- Where an image is found on a Pebbles-managed device, staff should avoid alteration or deletion and seek guidance from the DSL, the DDSL and QLineIT so that evidence is preserved safely.
- Where police involvement is likely, the device or evidence should be preserved with minimal handling and no further access unless directed by police or another appropriate authority.
- Staff must not copy or transfer imagery to another device or system unless directed by police or another legally authorised body.
- The DSL or DDSL will consider coercion, threats, malicious sharing, exploitation, age and developmental stage, SEND, adult involvement, distribution and immediate safety when assessing the incident.
- Parents or carers will normally be informed unless this could increase risk or conflict with advice from statutory agencies.
- All affected children should receive appropriate pastoral and safeguarding support, online-safety education and follow-up.

15. Online safety, remote education, filtering and monitoring

Online safety is part of safeguarding across Pebbles Connect. The service will consider the four areas of online risk used by KCSIE 2026: content, contact, conduct and commerce. Commerce includes risks such as gambling, phishing, scams, inappropriate advertising, financial exploitation and unsafe purchases. (Department for Education, 2026a).

15.1 Microsoft Teams and accounts

Microsoft Teams for Education is used for live teaching and communication. Staff and students will use individual Pebbles or Microsoft 365 accounts and must not share credentials. Student-to-student communication outside lesson spaces will be restricted according to current platform settings and educational need. Students may contact staff through approved channels within agreed service arrangements.

Students must not independently record, photograph or screenshot live lessons, staff or other students unless this has been authorised for an educational or accessibility purpose. Lesson links, invitations, recordings, screenshots or restricted content must not be shared outside the intended group without authorisation.

Any unauthorised access to Pebbles Connect systems, attempts to enter or disrupt sessions, inappropriate sharing of account credentials, or abusive, threatening or intimidating behaviour through Pebbles platforms must be reported promptly. Where the incident involves a student or creates a risk to a child, the DSL or DDSL will assess the safeguarding implications. QLineIT should be informed where technical investigation, account restriction, preservation of evidence or other security action is required.

Pebbles Connect may restrict or withdraw an individual's access to its online systems where this is necessary to protect students, staff or the security of the provision. Evidence should be preserved where appropriate, and police or another relevant authority should be contacted where the circumstances indicate a criminal offence, credible threat or immediate risk of harm.

15.2 Live teaching and recording

All live Teams lessons will be recorded. One-to-one lessons and meetings are permitted and must be recorded. Pastoral, safeguarding and wellbeing meetings conducted through Teams will also be recorded. Regular online therapeutic sessions arranged through Pebbles Connect will be recorded unless a different lawful and professionally approved arrangement has been agreed in advance.

Routine recordings will be retained until the end of the academic year. Where a recording becomes relevant to a safeguarding concern, accident, complaint, staff allegation or investigation, the relevant recording or clip may be extracted and retained with the applicable student or staff record according to the relevant retention schedule.

Students and parents or carers will be informed at enrolment or through privacy information that sessions are recorded, why they are recorded, who may access them and how long they are normally kept. Staff should remind students where appropriate, particularly for pastoral, safeguarding and therapeutic contact.

A technical recording failure does not automatically require a session to stop. The staff member must record the failure and notify the DSL where the session is one-to-one, pastoral, therapeutic or safeguarding-related. Repeated or unexplained failures will be reviewed by the DSL with QLineIT.

Recordings must not be downloaded, copied or shared outside approved systems without a legitimate safeguarding, legal, complaint or investigative purpose and appropriate authorisation. Authorised recordings may be reviewed for safeguarding, quality assurance, investigation of complaints or incidents, or review of professional practice. Access is limited to people with a legitimate professional reason. Where review concerns an identifiable safeguarding case, access and resulting action will be documented on CPOMS. Where a recording forms part of an HR investigation, access and use will be documented in the formal investigation record.

Routine recording access may be available to the student for their own session, the teaching staff involved in the session, the DSL, DDSL, Chief Operating Officer (COO) and CEO, according to system permissions and legitimate professional need. Care staff, parents and commissioning teams do not receive their own automatic recording access.

15.3 Cameras and online presentation

Students may choose whether to use a camera during routine learning, taking account of comfort, privacy and individual need. Staff may invite camera use and explain educational benefits without applying pressure. Camera-off status alone is insufficient to indicate a safeguarding problem. A sudden or unexplained change may contribute to the wider safeguarding picture when combined with other information.

15.4 Staff working remotely

Staff must teach or meet students from an appropriate professional and private environment. Household members or other unauthorised people must not be able to see, hear or participate in sessions. Headphones, privacy screens or other measures should be used where needed. Staff must communicate through approved Pebbles accounts and devices wherever possible. (Department for Education, 2022).

15.5 Filtering and monitoring

QLineIT manages Pebbles Care Ltd devices and the filtering and monitoring arrangements used by Pebbles Connect. During 2026-27, Pebbles Connect students are expected to use Pebbles-issued managed devices. The DSL and DDSL will review filtering and monitoring alerts and coordinate safeguarding action.

Pebbles Connect will maintain effective filtering and monitoring arrangements through the following measures:

- QLineIT will provide monitoring information and immediate alerts for high-risk activity.
- An urgent or high-risk alert should be communicated to the DSL by telephone and email. The DDSL is the urgent contact when the DSL is unavailable.
- Attempts to bypass filtering, concerning searches or unusual online activity will be considered in context as possible safeguarding information.
- Filtering and monitoring arrangements will be reviewed formally at least once each academic year and sooner after material changes to devices, software, networks, risk profile or provision.
- The annual review will include documented testing across managed student and staff devices. QLineIT will support the DSL and DDSL in checking that filtering and monitoring operate as intended.
- The Pebbles Care Ltd board will receive assurance about the annual review and key actions.
- Filtering should reduce access to harmful or inappropriate content without unnecessarily obstructing legitimate teaching and learning.

DfE standards updated in 2026 require annual review of filtering and monitoring, involvement of senior leadership, the DSL and IT support, and recorded checks across relevant internet-connected devices. (Department for Education, 2026d).

15.6 Mobile phones

Students should not use personal mobile phones during live Pebbles Connect lessons or in-person Pebbles Connect activities unless use has been authorised for an educational, accessibility, medical or safeguarding reason. This expectation reflects the KCSIE 2026 reference to mobile phone-free school environments while allowing for the specific circumstances of online provision. (Department for Education, 2026a).

15.7 Generative AI

Generative AI may create safeguarding risks through harmful content, manipulation, sexual imagery, impersonation, scams, privacy loss, misinformation and contact with unsafe services. Pebbles Connect will follow KCSIE 2026, current government guidance and its own teaching, learning, assessment and academic-integrity policies. AI-related safeguarding concerns must be reported through the normal safeguarding route. Filtering and monitoring reviews should consider the risk of real-time, personalised and AI-generated content. (Department for Education, 2026a; Department for Education, 2026d).

16. Mental health, self-harm, suicide risk and bereavement

Mental health difficulties can develop into safeguarding concerns and can also indicate abuse, neglect or exploitation. Education staff should recognise warning signs and report concern, while diagnosis remains the responsibility of appropriately trained health professionals. KCSIE 2026 gives specific attention to self-harm, suicidal ideation and suicide risk. (Department for Education, 2026a).

16.1 Self-harm and suicidal thoughts

Where staff become aware of self-harm, suicidal thoughts or a mental-health crisis, the following safeguarding response should be followed:

- Where a student discloses self-harm, suicidal thoughts or a mental-health crisis, the staff member should contact the DSL immediately by telephone or video. The DDSL provides cover.
- The staff member should explain that information cannot be kept secret where safety is at risk.
- Where self-harm is occurring live or there is immediate danger, emergency services and the responsible adult or care staff should be contacted without delay.
- A child at immediate risk should not be left unsupported online or in person while urgent action is being arranged.
- Suicidal thoughts without a stated plan or intent still require prompt DSL or DDSL review.
- The DSL or DDSL will consider an individual safety plan or updated risk assessment with the student, parent or carer, commissioner, care staff and health professionals.
- All disclosures, risk decisions, safety arrangements and follow-up will be recorded on CPOMS.
- Parents, carers or care staff will normally be informed promptly unless doing so could increase risk or conflict with professional advice.
- Where the student already works with CAMHS, a GP, psychologist, psychotherapist or other clinician, Pebbles Connect will coordinate with that professional with consent or under safeguarding information-sharing provisions where needed.
- Staff will not diagnose mental-health conditions.

Where there is immediate danger, KCSIE 2026 advises calling 999 or arranging immediate attendance at A&E with a suitable adult. Urgent mental-health help that is not an emergency can be sought through NHS 111 in England. Equivalent local services should be used elsewhere in the UK. (Department for Education, 2026a).

16.2 Return to learning

Following a significant mental-health crisis, self-harm episode, suicide attempt or hospital admission, the DSL will coordinate a return-to-learning plan where appropriate. The plan may include temporary adjustments, agreed communication, reduced demands, safety arrangements and review with the student and relevant adults or professionals.

16.3 Bereavement and traumatic loss

Bereavement, traumatic loss and serious adverse events may create significant wellbeing or safeguarding needs. The DSL or DDSL will coordinate support and educational adjustments with the student, family or care team, commissioner and relevant professionals. CPOMS will be used where there is a safeguarding or significant wellbeing concern.

Following the sudden or unexpected death of a student, the DSL will lead the immediate Pebbles Connect response with the DDSL, senior Pebbles Care leaders and relevant agencies. Wider communications and any external or media response will be coordinated through senior Pebbles Care leadership with regard to family wishes, confidentiality and any investigation. A review should consider support needs, practice, risk arrangements and any policy learning.

16.4 Staff support

Staff may need debriefing, supervision or wellbeing support after serious safeguarding incidents. The DSL or DDSL will identify immediate support needs and may involve HR, Occupational Health or other support services. Debriefing must maintain the confidentiality of the child and case.

17. Specific safeguarding issues

The following issues require the same prompt reporting route as any other safeguarding concern. Staff should use KCSIE 2026 Annex A and current national or local guidance for further information. (Department for Education, 2026a).

17.1 Child criminal exploitation and county lines

Child criminal exploitation occurs where a person or group uses an imbalance of power to coerce, manipulate or deceive a child into criminal activity. Apparent agreement does not remove the child's status as a victim of exploitation. Children may be threatened, trapped through debt, coerced into carrying drugs, money or weapons, or used in vehicle crime, theft, violence or other offences. County lines is one form of criminal exploitation involving drug distribution networks and dedicated communication routes. Staff should report unexplained money or possessions, absence, travel, injuries, threats, new relationships, fear, changes in behaviour or other signs in context. (Department for Education, 2026a).

17.2 Child sexual exploitation

Child sexual exploitation is a form of sexual abuse involving an imbalance of power, coercion, manipulation or deception. Exploitation can occur in exchange for something the child wants or needs, for financial or social advantage of another person, through threats or violence, or through organised networks. Apparent consent does not remove exploitation. Indicators may include unexplained gifts or money, older relationships, sexualised behaviour, absence or travel, changes in mood or appearance, sexually transmitted infections, pregnancy, coercion or online grooming. (Department for Education, 2026a).

17.3 Serious violence, gangs and weapons

Concerns about serious violence may include physical assault, carrying or threatening with weapons, peer conflict, gang association and criminal exploitation. Any concern about a child carrying or intending to use a weapon must be reported to the DSL or DDSL immediately. The safeguarding lead will assess risk to the student and others, consider a safety and support plan and decide whether police or children's social care should be involved. (Department for Education, 2026a).

17.4 Modern slavery and trafficking

Modern slavery includes sexual exploitation, criminal and financial exploitation, trafficking, forced labour, servitude, forced criminality and other exploitation. Where a potential victim is identified, the DSL or DDSL will consider child-protection referral and the National Referral Mechanism or the equivalent procedure for the child's location. (Department for Education, 2026a).

17.5 Domestic abuse and teenage relationship abuse

Children may experience domestic abuse by seeing, hearing or experiencing its effects at home, or through abuse within their own intimate relationships. Abuse can be physical, sexual, psychological, emotional, financial, coercive or controlling. Relevant notifications from police, local authorities, commissioners or care teams will be received and coordinated by the DSL, with the DDSL providing cover. The information will be recorded on CPOMS and used to review risk and support. (Department for Education, 2026a; Department for Education, 2026b).

17.6 Child-to-parent or caregiver abuse

A child may cause physical, emotional, coercive or controlling harm towards a parent or caregiver. Staff should consider the safety of the person affected and the child's own safeguarding needs, including possible trauma, unmet need, exploitation, harmful learned behaviour or risk from others. Concerns should be reported to the DSL or DDSL and coordinated with relevant family, care and statutory services. KCSIE 2026 now explicitly recognises child-to-parent or caregiver abuse. (Department for Education, 2026a).

17.7 Female genital mutilation

All concerns about FGM must be reported to the DSL or DDSL. A teacher in England who discovers in the course of their professional work that FGM appears to have been carried out on a girl under 18 has a personal legal duty to report this directly to the police. The DSL or DDSL will support the teacher and coordinate other safeguarding action. The exact legal duty and reporting process for the child's location must be followed. (Department for Education, 2026a).

17.8 Forced marriage and honour-based abuse

Forced marriage and other honour-based abuse may involve coercion, threats, violence, isolation, abduction or other harm linked to perceived family or community honour. Staff must report concerns to the DSL or DDSL. The DSL or DDSL will consider children's social care, police and the Forced Marriage Unit where applicable. Family mediation should not be attempted where it could increase risk. Staff should work on the basis that there may be a limited opportunity to protect the child and should act promptly.

17.9 Prevent and radicalisation

The DSL is the Pebbles Connect Prevent lead and the DDSL provides cover. All staff will receive Prevent awareness during onboarding and updates as needed. Concerns about susceptibility to radicalisation, extremist influence or terrorism should be recorded on CPOMS and reported to the DSL or DDSL. The safeguarding lead will assess the concern, seek local Prevent advice where needed and decide whether a Prevent or Channel referral is appropriate. The reason for referral or non-referral will be recorded. (Home Office, 2023; Department for Education, 2026a).

Pebbles Connect will maintain a Prevent risk assessment at least annually and sooner where provision, location, technology or risk changes. The assessment will include online content, social media, community influence and external speakers. The relevant Prevent duty guidance differs across the UK and the legally applicable national route will be followed.

17.10 Homelessness, housing insecurity and temporary accommodation

Housing insecurity can affect attendance, wellbeing, privacy, online access, supervision and safety. Where Pebbles Connect is informed that a child in England has been placed in temporary accommodation, the DSL or DDSL will review safeguarding, attendance, wellbeing, access-to-learning and contact-detail implications and update records or support arrangements as needed. A temporary-accommodation notification does not replace any child-protection referral required because a child has been harmed or is at risk. (Department for Education, 2026a).

17.11 Private fostering

Where information indicates that a child may be privately fostered, the DSL will consider the applicable legal definition and local authority notification requirements for the child's location. The DDSL provides cover. The concern and action will be recorded on CPOMS.

17.12 Family imprisonment and young carers

Children affected by a parent or carer in custody and young carers may experience additional emotional, practical, financial or attendance pressures. Staff should report safeguarding or wellbeing concerns and the DSL will coordinate appropriate support with the commissioner and relevant services. KCSIE 2026 specifically includes young carers among children who may need additional support. (Department for Education, 2026a).

17.13 Fabricated or induced illness

Concerns may arise where symptoms are fabricated, exaggerated or deliberately induced by a caregiver. Staff should record discrepancies, repeated unexplained medical presentation or other relevant information and report to the DSL or DDSL. Staff should avoid confronting the suspected caregiver or investigating the concern independently.

17.14 Faith, belief and spiritual-practice abuse

Abuse may be associated with harmful interpretations of faith, belief, spiritual practice, possession, witchcraft or other practices. Staff should respect lawful faith and culture while reporting any concern involving harm, coercion, degrading treatment, neglect or denial of necessary medical care. The child's safety and rights will guide the safeguarding response.

17.15 Substance use

Drug, alcohol, vaping, tobacco or medication misuse can become a safeguarding issue where there is exploitation, coercion, dependency, overdose risk, unsafe supply or significant impairment. A student who appears intoxicated during online or in-person activity should be referred immediately to the DSL or DDSL for safety assessment and contact with the responsible adult, care staff or emergency services where required.

Pebbles Connect does not permit smoking, vaping, alcohol use or misuse of substances during its educational activities. Where an adult student uses tobacco or vaping products lawfully outside an organised activity, arrangements must comply with venue rules and any agreed placement or care plan. Concerns about dependency, exploitation or risk remain subject to safeguarding action.

Where an illegal or unknown harmful substance is found during an in-person activity, staff should secure it only if safe to do so, minimise handling, inform the DSL or DDSL and seek police advice about preservation, collection or disposal.

18. SEND, looked-after children, medical needs and adult safeguarding

18.1 SEND and communication needs

The DSL is the lead for SEND within Pebbles Connect. Children with SEND may experience additional barriers to recognising or reporting abuse, may be more dependent on adults, may display distress differently and may be incorrectly assumed to be showing behaviour linked to disability rather than communicating harm. Staff should use communication methods suited to the child and consider the impact of online learning on access and observation. (Department for Education, 2026a).

Complex needs do not automatically prevent participation in an in-person or residential activity. Planning will consider the child's needs, the ability of the activity to meet them safely, privacy, dignity and the quality of the experience. The DSL makes the final education decision in consultation with the DDSL, the commissioner and relevant care or family adults. Where an activity cannot be accessed safely, the reason will be documented and an adapted or alternative opportunity considered.

18.2 Looked-after and previously looked-after children

The DSL is the designated teacher lead for looked-after and previously looked-after students within Pebbles Connect. Pebbles Connect will work directly with Virtual School Heads or equivalent teams, social workers, care staff and commissioners where relevant. Staff who need safeguarding or care information to support the child will receive the minimum information necessary for their role.

18.3 Medical conditions

A child with significant or complex health needs should have relevant medical information and an individual care or healthcare plan shared before or during placement as appropriate. The DSL will oversee educational access and safeguarding arrangements in liaison with the commissioner, parent or carer, care staff and health professionals. KCSIE 2026 adds specific attention to safeguarding children with medical conditions. (Department for Education, 2026a; Department for Education, 2017).

18.4 Learners aged 18 and over

Adult safeguarding will be considered for learners aged 18 and over where they have care and support needs, are experiencing or at risk of abuse or neglect, and may be unable to protect themselves because of those needs under the relevant national framework. The DSL or DDSL will coordinate the concern with the local authority adult safeguarding service and relevant professionals. CPOMS remains the internal safeguarding record where the learner is enrolled with Pebbles Connect.

19. Clinical and therapeutic services and confidentiality

Pebbles Care Ltd may provide or arrange support from Clinical Psychologists, Forensic Psychologists and trainees, Psychotherapists, Therapeutic Practitioners, Assistant Psychologists and other appropriately qualified professionals. The DSL may seek consultation or refer a child where this is suitable within the service and commissioning arrangements.

Relevant background information can support safe clinical work. Consent or permission should normally be sought before information is shared where appropriate. Where consent is refused, the DSL or DDSL will consider the child's competence, confidentiality, safeguarding risk, legal basis for sharing and professional advice. The Chief Operating Officer (COO) or relevant senior clinical or safeguarding leadership may be consulted where needed.

19.1 Confidentiality

Clinical and therapeutic work requires a clear explanation of confidentiality and its limits. Session detail should remain confidential unless information needs to be shared to protect the child, another person or a third party, or where disclosure is required by law. Information shared for safeguarding should be limited to what is necessary. The young person's views and consent should be sought where this can be done safely.

For children under 16, competence to make decisions about confidential therapeutic support will be assessed under the relevant legal principles for the child's jurisdiction, including Gillick competence where applicable. The clinician may seek safeguarding guidance from the DSL or DDSL while initially limiting identifying detail where this is professionally appropriate. Any safeguarding concern concerning a Pebbles Connect student must ultimately be shared through the Pebbles safeguarding route when the threshold for breaching confidentiality is met.

Clinical and therapeutic records must be held securely within the record system authorised for the relevant Pebbles Care service and accessed only by people whose role requires access. Detailed clinical or therapeutic session notes should not routinely be duplicated within CPOMS.

Where clinical or therapeutic work gives rise to a safeguarding concern, the information necessary to understand the concern, risk, action taken and safeguarding decision must be recorded on CPOMS through the normal safeguarding route. The clinical record may contain further professional detail where this is appropriate to the practitioner's role

and record-keeping requirements. Any sharing between clinical records, CPOMS and external professionals should be limited to information necessary for the purpose and undertaken through approved Pebbles systems.

Where a regular external or outsourced therapeutic professional works directly with a Pebbles Connect student, appropriate vetting, safeguarding induction, reporting routes and professional requirements must be completed before unsupervised work. Online sessions will be recorded where required by Pebbles Connect arrangements and the service agreement.

20. In-person activity, educational visits, sport and residential experiences

Pebbles Connect may arrange in-person educational visits, outdoor education, assessment sessions, sport, therapeutic activity, residential experiences and other face-to-face activity. Every activity must have a documented risk assessment that includes safeguarding and a named activity lead. The DSL retains overall safeguarding oversight and the activity lead is responsible for implementation on the day.

20.1 External providers and venues

Where an external provider, venue or partner is used, Pebbles Connect will review relevant safeguarding arrangements, risk assessments and vetting assurances before the activity. Staff should confirm emergency procedures, exits, assembly arrangements and emergency contact routes. The activity lead will carry a current student list and emergency contacts securely in an approved digital or hard-copy form.

20.2 Sport

Sport and outdoor activity require attention to supervision, professional boundaries, changing arrangements, physical contact, transport, one-to-one situations, equipment, medical needs and the safeguarding arrangements of coaches or external providers. Safety and fairness requirements for specific sports and the child's individual needs will be considered. For England, KCSIE 2026 includes a specific section on sport. (Department for Education, 2026a).

20.3 One-to-one contact

One-to-one in-person work is permitted where educationally or pastorally appropriate. Closed doors should be avoided unless the room has a clear vision panel or another suitable safeguarding measure. Staff must never block a child's exit from the space. Another member of staff should normally be in the building or nearby where practical.

20.4 Transport

Staff transport of students must comply with Pebbles Care Ltd driving checks, insurance, vehicle-suitability and transport risk procedures. Transport plans should consider lone travel, pickup and drop-off, emergency contacts, medical needs and known safeguarding risks.

20.5 Restrictive intervention and reasonable force

Physical intervention is expected to be exceptional within Pebbles Connect activity. Staff may use only lawful, necessary and proportionate force to prevent harm, using no more force than necessary for the shortest time that is required. Any staff member expected to use restrictive intervention must have appropriate training and authorisation. Risks for children with SEND, mental-health needs or medical conditions require careful consideration. (Department for Education, 2026e).

Every use of restrictive intervention will be reported to the DSL, recorded through the appropriate Pebbles incident system and on CPOMS where there is safeguarding relevance. Parents or carers, the commissioner and relevant care staff will be informed as appropriate. The DSL will review the incident with the DDSL and relevant care or professional staff to consider necessity, proportionality, support and changes to risk or behaviour plans.

20.6 Searching bags and confiscation

Pebbles Connect education staff may check a student's bag or possessions where necessary for safety and in line with the activity rules and lawful authority. Pebbles Connect staff are not authorised by this policy to search a student's person. Where a prohibited, dangerous or concerning item is found, staff may confiscate it where safe, inform the DSL and consider police, parents or carers, commissioner and care staff according to risk. Searches, bag checks and confiscation will be recorded on CPOMS with the reason, people present, item found, handling and follow-up. Current DfE searching and confiscation guidance will be considered for activities in England. (Department for Education, 2023).

20.7 Personal and intimate care

Pebbles Connect education staff do not provide personal or intimate care. Where a student requires such support to take part in an activity, the child must be accompanied by a trained and authorised carer who is responsible for personal care. Planning should protect privacy and dignity and should clarify roles before the activity begins.

20.8 Medication and first aid

Where medication may need to be administered during an in-person Pebbles Connect activity, the following arrangements will apply:

- written parent or carer consent is required for medication administration during an in-person activity unless an existing lawful care arrangement provides otherwise;
- long-term or complex medication needs should be set out in an individual healthcare or care plan;
- medication should be supplied in the original labelled container with name, dose, frequency and expiry information;
- medication should be stored securely, with emergency medication quickly accessible;
- only appropriately designated and trained staff should administer medication;
- each administration should be recorded with child, medication, dose, time and staff signature;
- self-administration may be supported where suitable for the student and care plan, with staff recording the medication and time;
- relevant medical, allergy and emergency information must be available to staff who need it.

Where a student is prescribed an adrenaline auto-injector or rescue inhaler and the individual plan requires two devices, two in-date devices must be available and accessible for participation in the activity. The activity lead will check this before departure or admission. Staff must know where the devices are kept and how emergency support will be accessed. At least one member of staff on an in-person visit should be trained to dispense an auto-injector.

An appropriately trained first aider should be present wherever possible according to the activity risk assessment. A first-aid kit must be available. Accidents, injuries and treatment will be recorded through the Pebbles Care Ltd accident and incident process, with CPOMS used where the event has safeguarding relevance. RIDDOR reporting will be handled through Pebbles Care Ltd Health and Safety procedures where applicable.

20.9 Residential experiences

Residential experiences require a specific safeguarding risk assessment covering sleeping arrangements, privacy, staffing, supervision, night-time access, missing risk, medical needs and reporting routes. Staff and students will have separate sleeping rooms. Any rare exception requires prior documented risk assessment and senior approval. Staff should avoid entering a student's bedroom alone wherever possible.

21. Visitors, guest speakers and external professionals

Most external contact with Pebbles Connect is online. The DSL will maintain an appropriate record of visitors and external professionals. Identity should be verified and the level of supervision determined by the person's role, checks and purpose of contact.

The following safeguarding arrangements apply to visitors, guest speakers and external professionals working with Pebbles Connect:

- Online guest speakers require the DSL's advance authorisation and a Pebbles staff member must remain present.
- Content, purpose and suitability should be considered in advance, including Prevent and discriminatory-content risks.
- Regular external therapeutic or professional providers who work one-to-one with students must complete appropriate checks and safeguarding induction.
- External providers must know how to report safeguarding concerns to the DSL or DDSL and how CPOMS or another agreed reporting route will be used.
- For in-person activity, provider safeguarding arrangements, risk assessments and vetting assurances should be reviewed in advance.
- Visitors should be identified, signed in or otherwise logged and supervised as appropriate to their role and clearance.

22. Allegations and safeguarding concerns about adults

Pebbles Connect will respond to any safeguarding concern or allegation about an adult working with children, including employees, agency staff, contractors, consultants, therapeutic staff, trainees and relevant external professionals. Concerns that may meet the harm threshold will be managed separately from low-level concerns. (Department for Education, 2026a, Part Four). All Pebbles Care staff are required to complete live, online training regarding the managing of allegations against staff members.

22.1 Harm threshold

The harm-threshold process applies where an adult may have harmed a child, may have committed an offence against or related to a child, may pose a risk of harm to children, or may have behaved in a way that indicates they may be unsuitable to work with children. The case manager will consider current KCSIE and relevant LADO or equivalent procedures for the child's location.

22.2 Case managers and LADO contact

The case management and escalation arrangements for safeguarding concerns or allegations about adults are as follows:

- Concern or allegation about an ordinary Pebbles Connect staff member: the DSL is case manager and will contact the relevant LADO or equivalent where the harm threshold may be met.
- Concern or allegation about the DSL: the DDSL is case manager and will contact the relevant LADO or equivalent.
- Concern or allegation about the DDSL: the Chief Operating Officer (COO) is case manager and will contact the relevant LADO or equivalent.
- Concern or allegation about the Chief Operating Officer (COO): the Chief Executive Officer (CEO) is case manager and will contact the relevant LADO or equivalent.
- Concern or allegation about the Chief Executive Officer (CEO): the Pebbles Care Ltd board will act as case manager.

Where the child is in England and the harm threshold may be met, the relevant LADO should be contacted promptly and normally within one working day, before an internal investigation that could compromise statutory processes. Where the child is elsewhere in the UK, the equivalent local or national managing-allegations procedure will be followed.

22.3 External professionals and adults in other Pebbles services

Where the concern relates to an external professional who is not employed by Pebbles Care Ltd, the DSL or DDSL will notify the person's employer or commissioning organisation and follow the local managing-allegations route where the harm threshold may be met. Where the concern relates to a Pebbles Care residential or other Pebbles Care staff member, the DSL or DDSL will inform the appropriate senior manager and ensure referral to LADO or equivalent where required. If the concern relates to an identifiable Pebbles Connect student, relevant safeguarding information will be recorded on CPOMS.

22.4 Managing the investigation

The investigation and associated safeguarding arrangements will be managed in accordance with the following principles:

- Suspension is not automatic. The case manager and HR will consider temporary measures, alternatives to suspension and risk in line with KCSIE and HR procedures.
- The adult who is the subject of the allegation should receive appropriate support and updates, subject to any restriction imposed by the LADO, police or another agency.
- The child should receive support, age-appropriate information and suitable communication with parents or carers, commissioner and agencies.
- Information will be shared on a need-to-know basis and confidentiality maintained.
- HR will maintain the employment investigation record. The safeguarding case manager will maintain the safeguarding or case-management record.
- Outcome categories will use the KCSIE terms substantiated, malicious, false, unsubstantiated and unfounded.
- The commissioner's DSL will normally be informed where the allegation concerns their student, subject to LADO, police or other agency direction.
- Resignation, dismissal, termination or a settlement does not stop safeguarding enquiries or remove duties to make DBS or professional-regulator referrals where criteria are met.
- Where referral criteria are met, Pebbles Care Ltd will refer to the Disclosure and Barring Service and the applicable teacher regulator, including the Teaching Regulation Agency or General Teaching Council for Scotland where relevant.

23. Low-level concerns, professional boundaries and whistleblowing

23.1 Low-level concerns

A low-level concern is a concern about adult conduct that falls below the harm threshold, including behaviour that is inconsistent with the Staff Code of Conduct or creates a sense of unease. “Low-level” describes the threshold and does not mean the concern is unimportant. Concerns will be recorded separately from child safeguarding case files and reviewed for patterns in conjunction with HR. (Department for Education, 2026a).

Low-level concerns can arise from a single incident, a pattern of behaviour, a complaint, information shared by a child or adult, observation by a colleague, or information identified through vetting or other checks. Examples may include over-familiarity with a student, favouritism, inappropriate private communication, use of personal social media or devices for student contact, unauthorised recording or photography, humiliating or intimidating behaviour, repeated blurring of professional boundaries, or one-to-one contact conducted in a manner inconsistent with Pebbles expectations. Context must always be considered when deciding how the concern should be managed.

A low-level concern record should include the nature and context of the concern, when and how it arose, the person who raised it where known, decisions made, advice sought and action taken. Where a person asks for their identity to be withheld, this should be considered and respected as far as reasonably possible, recognising that confidentiality cannot be guaranteed where disclosure is required for safeguarding, employment or legal purposes.

Low level concerns should be reported through the following routes, according to the role of the person concerned:

- Ordinary staff member: concern reported to the DSL in the first instance, with HR involved as appropriate.
- Concern about the DSL: report to the DDSL.
- Concern about the DDSL: report to the Chief Operating Officer (COO).
- Concern about the Chief Operating Officer (COO): report to the Chief Executive Officer (CEO).
- Concern about the Chief Executive Officer (CEO): report to the Pebbles Care Ltd board.

Staff are expected to self-refer where their own conduct may have been misunderstood, may have fallen below expected professional standards or may create a boundary concern. Low-level concern records will be held confidentially by the DSL and HR as appropriate and reviewed for patterns. The standard organisational retention period is seven years after employment ends unless a longer HR or legal retention period applies. Low-level information will not automatically be included in a reference, but relevant substantiated conduct may be included where required by current HR practice and KCSIE.

23.2 Professional boundaries

Staff are expected to maintain clear professional boundaries in all interactions with students and should follow these requirements:

- Staff must use approved Pebbles communication channels and accounts for student contact.
- Staff must not add, follow or privately communicate with current students through personal social-media accounts.
- Outside employment, volunteering, relationships or activities that create a safeguarding conflict or boundary risk must be disclosed through the appropriate management route.
- Accidental or unavoidable contact with a student outside approved channels should be reported to the DSL where there is a safeguarding or boundary implication.
- Gifts, money or favours that create a boundary, favouritism or safeguarding concern are prohibited unless part of an authorised school activity or agreed arrangement.
- Physical contact must be appropriate, necessary and proportionate and must never be used as punishment. Contact that could be misunderstood should be reported to the DSL.
- Staff should report concerns arising from a colleague's conduct outside work where it may indicate a transferable safeguarding risk.

23.3 Whistleblowing

All staff should feel able to raise concerns about poor or unsafe safeguarding practice. Pebbles Care Ltd Whistleblowing procedures may be used where a member of staff believes a safeguarding concern is being ignored, mishandled or cannot reasonably be raised through the normal line. External whistleblowing channels may be used where internal routes are unsuitable or have failed to address a genuine safeguarding concern. (Department for Education, 2026a).

24. Safer recruitment and the Single Central Record

Pebbles Care Ltd HR maintains the Single Central Record for relevant staff and is responsible for updating and auditing it. Recruitment processes will follow current KCSIE safer-recruitment principles and applicable law. All hiring managers involved in recruitment must have safer-recruitment training. (Department for Education, 2026a).

As part of safer recruitment, Pebbles Care Ltd will undertake the following checks and processes, as applicable to the role:

- enhanced DBS and barred-list checks where legally required before unsupervised work with children;
- identity and right-to-work checks;
- professional qualification and registration checks relevant to the role;
- references covering employment or activity during the previous five years and, where a role involved work with children or regulated activity, references from relevant organisations across the candidate's work history where required by the recruitment process;
- full employment history with gaps or inconsistencies explored;
- online searches for shortlisted candidates as part of due diligence;
- overseas criminal-record or equivalent checks where required and reasonably obtainable;
- prohibition from teaching checks and other professional restrictions where applicable;
- section 128 checks where legally applicable to the role;
- safeguarding questions during interview; and
- completion of required checks before the individual begins unsupervised work with children.

KCSIE 2026 reflects the removal of the supervision exemption from regulated activity from 1 September 2026 following the Crime and Policing Act 2026. Volunteer or other unpaid roles involving teaching, training, instruction, care or supervision must be assessed against the revised regulated-activity definition. (Department for Education, 2026f).

Pebbles Connect does not currently use volunteers. Any future volunteer arrangement will be assessed under the law and KCSIE in force at that time. Agency staff, contractors, consultants and external professionals must have checks and safeguarding information suitable to their role before contact with students.

Staff must notify Pebbles Care Ltd of changes that could affect suitability to work with children, including relevant criminal, regulatory or safeguarding matters. Repeat DBS checks will be undertaken where required by law, organisational policy or a specific concern.

25. Training, safeguarding education and student voice

25.1 Staff induction and training

Every Pebbles Connect staff member will complete safeguarding and child-protection induction before, or at the very start of, direct work with students. Part-year joiners receive the same induction before direct student contact. Induction will cover this policy, the Staff Code of Conduct, reporting routes, child-on-child abuse, online safety, filtering and monitoring, the DSL and DDSL, Prevent and relevant professional boundaries.

All Pebbles Connect staff, including staff who do not work directly with children, are required to read Part One of KCSIE 2026 in full. The DSL and DDSL will maintain working knowledge of the complete guidance. Staff will receive formal safeguarding training at least annually and further updates through the academic year according to guidance, service needs and emerging risk. (Department for Education, 2026a).

25.2 Student safeguarding education

Students will receive age-appropriate safeguarding induction explaining how to report a concern, how to contact the DSL or DDSL, expectations for online conduct and where to seek help. Safeguarding will be revisited through PSHE, assemblies, tutor or pastoral work, curriculum opportunities and other suitable sessions.

Education will cover healthy relationships, consent, online safety, exploitation, abuse, harmful sexual behaviour, bullying, discrimination and seeking help. Content and communication will be adapted for SEND, literacy, language, communication needs and other barriers.

25.3 Parent, carer and supervising-adult information

Parents, carers and supervising adults will be signposted to safeguarding and related policies on the Pebbles Connect website and will be given clear contact routes for the DSL and DDSL. Online-safety guidance and relevant resources will be shared or signposted when useful.

25.4 Student voice

Students can raise concerns directly with the DSL or DDSL through approved systems or with any trusted member of staff, who must report the concern. Pebbles Connect will seek student views on safety, reporting routes and confidence in seeking help through age-appropriate discussion, surveys or pastoral feedback. Themes may inform the annual safeguarding review and anonymised board reporting.

Students will also be given age-appropriate information about sources of help outside Pebbles Connect. This may include Childline and, where concerns relate to online sexual abuse, exploitation or other harmful online activity, the Child Exploitation and Online Protection service (CEOP). Staff should support a student to access an appropriate external source of help where requested or where this forms part of an agreed safeguarding response.

Access to independent support does not replace Pebbles Connect's responsibility to act on safeguarding information that becomes known to staff. Students will have access to regular signposting of safeguarding pathways.

26. Complaints and safeguarding

Safeguarding-related complaints may be raised through the Pebbles Connect Complaints Policy. A complaint process must never delay safeguarding action, statutory referral, LADO contact or emergency response. Safeguarding-related complaints should be directed through the following routes, according to the role of the person concerned:

- Complaint about the DSL or their handling of safeguarding: DDSL.
- Complaint about the DDSL where they are managing the concern from the outset: DSL, who may seek advice from the Chief Operating Officer (COO).
- Complaint involving both the DSL and DDSL, or where the DSL cannot independently review the DDSL: Chief Operating Officer (COO).
- Complaint about the Chief Operating Officer (COO): the Chief Executive Officer (CEO), with HR as appropriate.
- Complaint about the Chief Executive Officer (CEO): the Pebbles Care Ltd board.

Where a complaint concerns an identifiable student or safeguarding case, relevant handling, decisions and outcomes will be recorded on CPOMS where appropriate. HR investigation material concerning staff remains within the relevant HR record.

27. Quality assurance, governance reporting and policy review

The DSL will provide termly safeguarding reports to the Pebbles Care Ltd board and additional information when requested. Reports will cover themes in referrals, attendance, online safety, training, emerging risks and other assurance information while protecting individual confidentiality.

At least annually, the DSL will lead a safeguarding self-evaluation or compliance audit against current KCSIE and this policy. The DDSL and the Pebbles Care Ltd board will review the outcome. Actions will identify responsible people, timescales and follow-up. Previous actions will be checked at the next review.

The policy will be reviewed at least annually and sooner following significant legislation or guidance changes, a serious safeguarding incident, material change to provision, organisational restructuring or an identified practice weakness. The DSL will lead the review with the DDSL and Chief Operating Officer (COO). The Head of Education is the formal approver.

Staff must read updated versions of this policy and confirm understanding through the organisation's normal policy-management process. The current policy will be available on the Pebbles Connect website and commissioners will be signposted to it during placement or onboarding.

Staff are expected to cooperate with safeguarding audits, case reviews, investigations and legitimate requests for information.

28. Records retention and transfer

Safeguarding records will be retained securely according to legal requirements, Pebbles Care Ltd retention schedules and the nature of the child's placement. Where a Pebbles Connect student is also resident in a Pebbles Care children's home and the record forms part of the residential child case record, applicable residential records are retained until the 75th anniversary of the child's birth or, where the child dies before 18, for 15 years from the date of death, subject to the detailed corporate retention schedule and applicable regulation. (Children's Homes (England) Regulations 2015, reg. 36).

For non-residential safeguarding and child-protection records created by Pebbles Connect, the standard retention period will be until the child's 25th birthday unless another legal requirement, care status, investigation, litigation hold or Pebbles Care Ltd schedule requires longer retention. Records relating to staff allegations and HR matters will follow the applicable KCSIE, LADO, HR and legal retention requirements.

When a placement ends, Pebbles Connect will retain its own record according to the applicable schedule and transfer relevant safeguarding information securely to the commissioner or next setting where required. KCSIE 2026 expects child-protection files to be transferred as soon as possible and within five days for an in-year transfer or within the first five days of a new term, separately from the main pupil file, with receipt confirmed. Pebbles Connect will use these timescales where they fit the commissioned placement and will avoid delay in any safeguarding handover. (Department for Education, 2026a).

Secure transfer may use CPOMS transfer, encrypted or password-protected email, or another approved secure method. Receipt must be confirmed. The transfer should include a clear summary of current concerns, relevant context, ongoing support and any immediate action needed.

29. Related policies

This policy should be read alongside current Pebbles Connect and Pebbles Care Ltd policies and procedures relevant to the issue, including:

- Behaviour Policy;
- Online Safety Policy;
- Attendance Policy;
- Complaints Policy;
- Staff Code of Conduct
- Quality Assurance and Standards Policy
- Whistleblowing Policy;
- Data Protection and Information Security policies;
- Health and Safety procedures;
- SEND Policy;
- Admissions Policy;
- Curriculum, Teaching and Learning and Assessment policies;
- HR safer-recruitment, disciplinary and managing-allegations procedures;
- Accident and Incident Reporting procedures; and
- Pebbles Care Ltd residential safeguarding, care and medication procedures where relevant to the individual child.



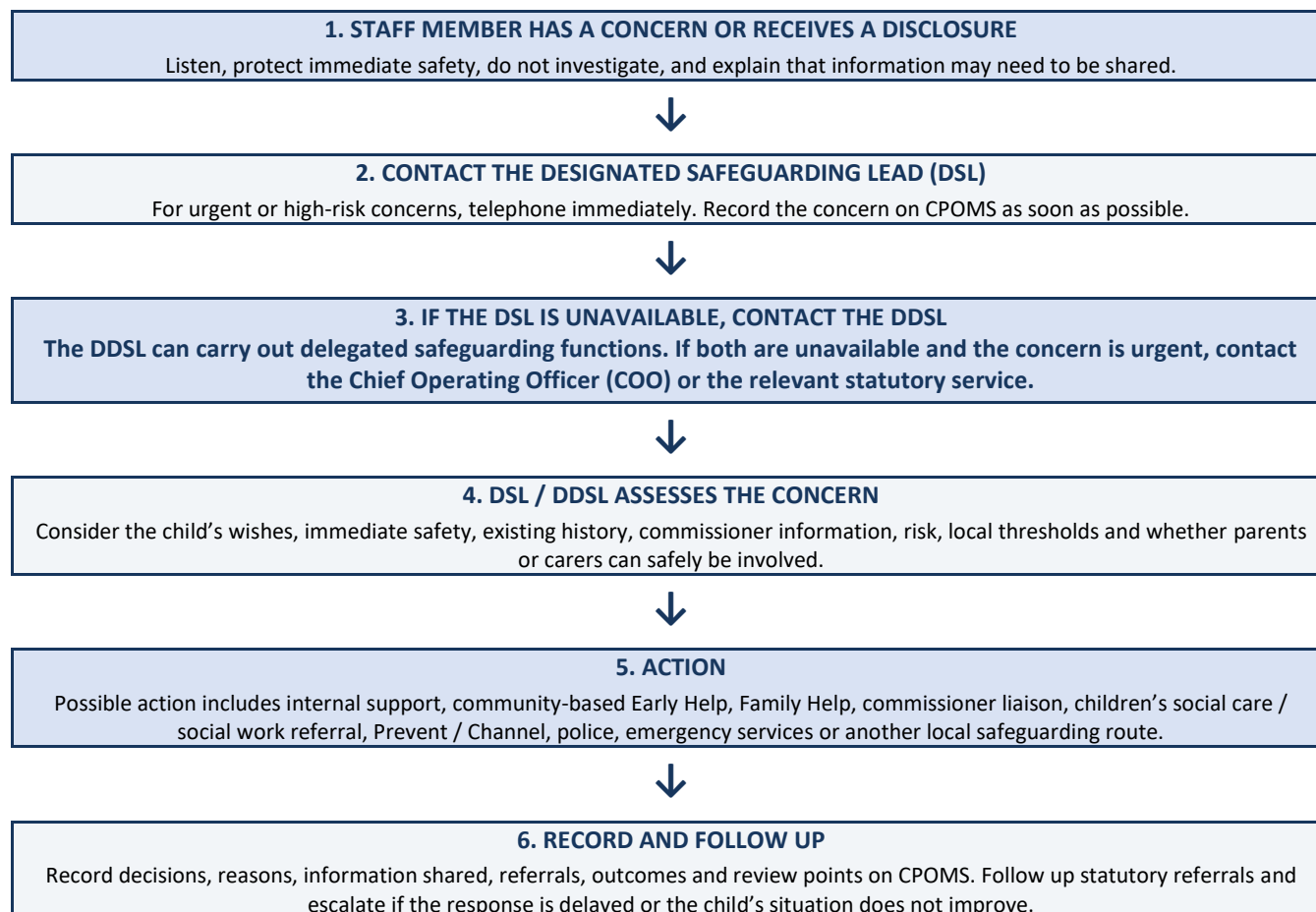
References and government guidance

- Department for Education (2017) Supporting pupils at school with medical conditions. Statutory guidance.
- Department for Education (2022) Safeguarding and remote education. Guidance.
- Department for Education (2023) Searching, screening and confiscation in schools. Guidance.
- Department for Education (2024) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers.
- Department for Education (2025a) Children missing education. Statutory guidance, updated September 2025.
- Department for Education (2025b) Alternative provision. Statutory guidance, updated February 2025.
- Department for Education (2026a) Keeping Children Safe in Education 2026. Statutory guidance, effective 1 September 2026.
- Department for Education (2026b) Working Together to Safeguard Children 2026. Statutory guidance.
- Department for Education (2026c) Working together to improve school attendance. Statutory guidance, updated July 2026.
- Department for Education (2026d) Filtering and monitoring: core standard. Meeting digital and technology standards in schools and colleges, updated June 2026.
- Department for Education (2026e) Restrictive interventions, including the use of reasonable force, in schools. Guidance, effective 1 April 2026.
- Department for Education (2026f) Regulated activity: removal of the supervision exemption. Guidance, effective 1 September 2026.
- Department of Health Northern Ireland (2017, updated 2026) Co-operating to Safeguard Children and Young People in Northern Ireland.
- Home Office (2023) Prevent duty guidance: England and Wales. Statutory guidance, in force from 31 December 2023.
- Scottish Government (2023) National Guidance for Child Protection in Scotland 2021, updated 2023.
- UK Council for Internet Safety (2024) Sharing nudes and semi-nudes: advice for education settings working with children and young people.
- Welsh Government (2019) Working Together to Safeguard People, Volume 5: Handling Individual Cases to Protect Children at Risk.
- Welsh Government (2022) Keeping Learners Safe: the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002.
- Children's Homes (England) Regulations 2015, regulation 36.
- Data Protection Act 2018; UK General Data Protection Regulation; Data (Use and Access) Act 2025.
- Children's Wellbeing and Schools Act 2026.

Guidance and legal references are current to 26 August 2026. Where guidance is amended after approval, current law and statutory guidance take precedence and an early policy review should be undertaken where the change affects Pebbles Connect practice.

Appendix A. Safeguarding reporting flowchart

Core route for a concern about a child. Urgent risk always takes priority over completion of the written record.



Where a child is in immediate danger or a crime is in progress, staff should FIRST contact the emergency services on 999 and then inform the DSL or DDSL as soon as possible.

A staff member may contact the relevant statutory service directly where internal safeguarding cover is unavailable, urgent action is required or the staff member believes a safeguarding concern is not being acted upon.

Appendix B. Allegations and low-level concern escalation routes

B1. Allegations or concerns that may meet the harm threshold

Person subject to concern	Case manager / first internal route	External managing-allegations route
Ordinary Pebbles Connect staff member	Designated Safeguarding Lead (DSL)	Relevant LADO or equivalent where threshold may be met
Designated Safeguarding Lead (DSL)	Deputy Designated Safeguarding Lead (DDSL)	Relevant LADO or equivalent
Deputy Designated Safeguarding Lead (DDSL)	Chief Operating Officer (COO)	Relevant LADO or equivalent
Chief Operating Officer (COO)	Chief Executive Officer (CEO)	Relevant LADO or equivalent as applicable
Chief Executive Officer (CEO)	Pebbles Care Ltd board	Relevant LADO or equivalent as applicable

B2. Low-level concerns

Person subject to concern	Report to
Ordinary staff member	Designated Safeguarding Lead (DSL), with HR as appropriate
Designated Safeguarding Lead (DSL)	Deputy Designated Safeguarding Lead (DDSL)
Deputy Designated Safeguarding Lead (DDSL)	Chief Operating Officer (COO)
Chief Operating Officer (COO)	Chief Executive Officer (CEO)
Chief Executive Officer (CEO)	Pebbles Care Ltd board

Appendix C. Core indicators of abuse and neglect

Indicators should be considered in context and are not proof of abuse. Some children show no obvious signs. Online staff may see fewer physical indicators, so changes and patterns across attendance, behaviour, communication, appearance and the home learning environment should be considered together.

Physical abuse

- unexplained, repeated or patterned bruising, burns, bites or injuries;
- injuries with inconsistent, vague or changing explanations;
- fear of a parent, carer or another person being contacted;
- repeated delay in seeking medical attention;
- avoidance of physical contact, unusual covering of the body or fear of medical help;
- changes in behaviour, aggression, withdrawal or distress linked to injury.

Emotional abuse

- persistent low self-esteem, fearfulness, anxiety, withdrawal or social isolation;
- extreme passivity, aggression, attention-seeking or over-reaction to mistakes;
- persistent criticism, humiliation, intimidation, rejection or scapegoating reported or observed;
- developmentally inappropriate expectations or severe restriction of normal social interaction;
- exposure to domestic abuse, coercive control, serious bullying or threats;
- self-harm, substance use or marked changes in emotional presentation.

Neglect

- persistent hunger, poor hygiene, inadequate clothing or unsafe living conditions;
- untreated or poorly managed medical, dental or mental-health needs;
- repeated absence, tiredness, lack of supervision or inconsistent access to learning;
- failure to provide safe care, appropriate caregivers or protection from danger;
- emotional unresponsiveness, lack of basic care or repeated unmet developmental needs;
- concerns about food, warmth, medication, sleep, supervision or safe accommodation that form a pattern.

Sexual abuse

- a disclosure or concerning sexualised communication;
- sexual knowledge or behaviour that is unusual for the child's age or developmental stage;
- coercion, sexual threats, grooming, sexual imagery, exploitation or online sexual contact;
- sudden withdrawal, anxiety, depression, self-harm or changes in relationships linked to sexual concern;
- unexplained sexual health concerns or pregnancy;
- avoidance, fear or distress relating to a particular person, place or activity.

Indicators involving parents, carers and the home environment

- Safeguarding concerns may also arise from information about the adults caring for a child or from circumstances within the home or care environment. Such information should be considered alongside what is known about the child and should not be treated as evidence of abuse or neglect in isolation. Relevant indicators may include:
 - repeated delay or failure to seek appropriate medical care for a child;
 - explanations for injuries, illness or other concerns that are vague, inconsistent or change over time;
 - aggressive, threatening, humiliating, coercive or controlling behaviour towards the child or others;
 - repeated failure to provide appropriate food, clothing, medication, supervision, warmth or other basic care;

- a child being left with adults whose intoxication, violence or other behaviour may place them at risk;
 - significant concerns about unsafe, unsuitable or persistently unhygienic living conditions;
 - repeated failure to engage with necessary health, education, care or safeguarding arrangements where this affects the child's welfare; and
 - information about domestic abuse, substance misuse, adult mental-health difficulties, social isolation or other family circumstances that may affect the child's safety or care.
- Staff should record and report concerns where an individual observation, combination of factors or developing pattern raises concern for the child's welfare.

Any indicator that creates concern should be recorded and reported. Staff should avoid waiting for certainty or a complete explanation before sharing safeguarding information with the DSL or DDSL.

Revision history

Version	Date	Approved by
1.0	26 August 2026	Head of Education