

Safeguarding Policy
(Including Child Protection Procedures)

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1. Purpose and scope

Nudge Education exists to eradicate chronic disengagement from education. We are commissioned to work with young people who may have experienced significant disruption, exclusion, trauma, unmet need or vulnerability. Safeguarding is therefore integral to every part of our work, not a separate activity.

This policy sets out Nudge Education's approach to safeguarding children and young people and the child protection procedures to be followed when there is concern that an individual child may be suffering, or is likely to suffer, significant harm.

This is one overarching Safeguarding Policy. The sections that follow describe Nudge Education's safeguarding arrangements and its response to specific safeguarding risks; they are not separate standalone policies. Child protection forms part of this policy and refers specifically to the action taken where there is concern that a young person is suffering, or is likely to suffer, significant harm.

This policy applies to all Nudge Education staff and practitioners. It applies to face-to-face and online delivery, travel and community activity, communication with young people and families, and any other context in which Nudge Education carries out its work.

For the purposes of this policy, a child or young person is anyone under the age of 18. Where Nudge Education supports a person aged 18 or over, the adult safeguarding arrangements in section 27 also apply.

Nudge Education is a national non-school alternative provision and intervention provider. Commissioning schools, local authorities and other bodies retain their own statutory responsibilities for the children they place with us. Nudge Education's responsibility is to maintain safe provision, identify and act on concerns, share relevant information and work actively with commissioners and statutory agencies. Where commissioner or local safeguarding partnership procedures set additional requirements, these will be followed alongside this policy.

2. Statutory and practice framework

This policy has been developed with regard to the following legislation, statutory guidance and national standards, as applicable to Nudge Education's role:

- Children Act 1989 and Children Act 2004
- Children's Wellbeing and Schools Act 2026, including the new safeguarding information-sharing provisions as they commence
- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education 2026 (KCSIE), used by Nudge Education as the core education safeguarding benchmark while recognising that its statutory status is directed principally at schools and colleges
- Education Act 2002
- Equality Act 2010
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Online Safety Act 2023
- Counter-Terrorism and Security Act 2015 and current Prevent/Channel guidance

- Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015
- Domestic Abuse Act 2021
- Human Rights Act 1998
- SEND Code of Practice: 0 to 25 years
- DfE Non-school Alternative Provision: Voluntary National Standards
- Relevant local multi-agency safeguarding arrangements and commissioner procedures.
- Care Act 2014, including the local authority duty to make safeguarding enquiries under section 42.

This policy should be read alongside other relevant Nudge Education policies and procedures, including the Safer Recruitment Policy, Practitioner Code of Conduct, Data Protection and Information Security Policy, Whistleblowing Policy, relevant Health and Safety policies, Lone Working policies, Physical Intervention Policy, Managing Allegations Against Staff Policy, Digital conduct and communications policy and, where applicable, the NEO Online Safety and Acceptable Use Policy.

3. Safeguarding and child protection: what we mean

Safeguarding is the broad responsibility to promote children's welfare, prevent harm, identify emerging need, provide or support early help, create safe environments and take action when concerns arise. It includes prevention, identification and response.

Child protection is part of safeguarding. It refers to the action taken when there is concern that a particular child is suffering, or is likely to suffer, significant harm.

In simple terms: safeguarding asks, "How do we keep young people safe?" Child protection asks, "A young person may not be safe. What do we do now?" All child protection is safeguarding, but not all safeguarding activity is child protection.

Nudge Education adopts the definition of safeguarding and promoting the welfare of children set out in *Working Together to Safeguard Children 2026*.¹

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

4. Safeguarding principles

Safeguarding is everyone's responsibility.

The welfare and best interests of the young person are central to decision-making.

¹ ¹ Department for Education, [Working Together to Safeguard Children 2026](#), p.9.

It could happen here. Staff must not assume that abuse, exploitation or harmful behaviour is unlikely because of a young person's presentation, family circumstances or previous history.

Young people should be listened to, taken seriously and involved in decisions affecting them wherever appropriate.

Young people may not recognise an experience as harmful or may not be ready or able to disclose it. Staff must maintain professional curiosity.

Abuse, neglect, exploitation and other safeguarding issues frequently overlap.

Safeguarding concerns may arise inside or outside the home, in education, in the community and online.

Disengagement, changes in attendance, presentation or behaviour may communicate unmet need or safeguarding risk.

Practice must be trauma-informed, inclusive, anti-discriminatory and culturally informed. Staff must challenge racism, discrimination and prejudice.

Information should be shared when it is necessary and proportionate to safeguard a child. Data protection must not be treated as a barrier to appropriate safeguarding information sharing.

Concerns should be acted upon promptly. Staff do not need proof of abuse before raising a safeguarding concern.

5. Roles and responsibilities

5.1 All staff and practitioners

- know how to recognise and report safeguarding concerns
- know the identity of the NDSL/RDSLs and how to obtain safeguarding support
- follow Nudge Education reporting procedures immediately when concerned about a young person
- record concerns factually and promptly
- maintain professional boundaries and follow the Practitioner Code of Conduct
- share relevant safeguarding information through approved systems and routes
- co-operate with safeguarding enquiries and multi-agency work
- challenge unsafe, discriminatory or inappropriate practice
- report concerns about adults working with children, including low-level concerns.

5.2 National Designated Safeguarding Lead

- provides strategic safeguarding leadership and oversight across Nudge Education
- ensures safeguarding arrangements, policies, training and reporting systems remain current
- maintains oversight of safeguarding themes, patterns, quality and organisational learning
- provides advice and an escalation point for complex, high-risk or unresolved safeguarding matters

- maintains oversight of allegations and safeguarding concerns relating to adults working with young people, with operational management led by the RDSL where appropriate
- supports and oversees the RDSLs in the delivery of their safeguarding responsibilities
- ensures appropriate safeguarding leadership and capacity is maintained across Nudge Education

5.3 Regional Designated Safeguarding Leads

- provide day-to-day safeguarding advice and support across their regions
- review safeguarding concerns and determine appropriate actions, referrals and escalation
- lead liaison with commissioners, local authority children's social care, police, LADO, Prevent and other safeguarding agencies as appropriate
- manage safeguarding concerns and allegations relating to adults working with young people, escalating to the NDSL where required
- lead and support multi-agency referrals and safeguarding escalation
- support staff following disclosures, incidents or complex safeguarding situations
- maintain oversight of safeguarding records, actions and outcomes
- identify themes, repeat concerns and contextual risks and escalate these to the NDSL
- ensure appropriate safeguarding cover is available within the RDSL arrangements, escalating to the NDSL where required

5.4 Education Intervention Co-ordinators (EICs) and Regional Leadership

EICs, Assistant Regional Leads and Regional Leads have responsibilities for supporting safe intervention delivery within their respective roles. They must ensure that safeguarding concerns are identified, recorded and escalated appropriately, support communication with commissioners where required, and ensure agreed safeguarding and risk-management actions relevant to their role are implemented.

These roles support, but do not ordinarily replace, the safeguarding responsibilities of the RDSLs. Where specific safeguarding responsibilities are delegated as part of agreed holiday support or other formal cover arrangements, the individual providing cover must follow the responsibilities and escalation arrangements set out for that period. Safeguarding concerns must always be responded to and escalated without delay.

5.5 Safeguarding cover

Nudge Education will ensure that appropriate safeguarding support and escalation arrangements are maintained during periods of absence, including school holidays and other periods of planned leave.

Where an RDSL is unavailable, safeguarding support will be provided in line with the agreed holiday support or other formal cover arrangements. Individuals providing cover will be clear about the safeguarding responsibilities delegated to them, the limits of their role and the appropriate escalation route.

Where there is an immediate risk to a young person, staff must not delay necessary action while attempting to contact a particular individual within Nudge Education.

Emergency services or the relevant statutory safeguarding service should be contacted directly where required, with the appropriate Nudge Education safeguarding contact informed as soon as possible.

6. Staff induction, training and expected practice

All staff will receive safeguarding induction appropriate to their role. Nudge Education requires all staff to read Part One of KCSIE 2026 and to understand Nudge Education's safeguarding systems and procedures.

Safeguarding and child protection training will be provided at induction and regularly updated. Staff will receive information and guidance on online safeguarding appropriate to their role and responsibilities.

Safeguarding updates will be provided at least annually and more frequently where legislation, guidance, emerging risk or organisational learning requires this.

Staff working directly with young people will receive safeguarding training appropriate to their role and the nature of the work they undertake, with additional training provided where specific risks or responsibilities are identified.

Relevant staff will receive enhanced safeguarding training commensurate with their responsibilities.

DSL-level knowledge and skills will be refreshed in line with current expectations and organisational need, currently every two years at least with annual updates.

Training must be translated into practice. Completion of a course does not remove the responsibility to seek advice when unsure.

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

Staff must be alert to indicators of abuse, neglect, exploitation and modern slavery and understand that a child may experience several forms of harm at the same time. Harm may occur in the family, education, community or online and may be caused by adults or other children.

Child-on-child abuse can take many forms and is addressed in more detail in Section 12 of this policy.

Physical abuse

May include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. It also includes circumstances where illness is fabricated or deliberately induced.

Emotional abuse

Persistent emotional maltreatment which causes severe and adverse effects on emotional development. This may include persistent criticism, belittling, name-calling, silencing, humiliation, serious bullying, coercion, exposure to the ill-treatment of others, overprotection or developmentally inappropriate expectations.

Sexual abuse

Forcing or enticing a child to take part in sexual activity, whether or not the child understands what is happening. It can involve contact or non-contact activity, grooming, sexual imagery and online abuse. Sexual abuse can be perpetrated by adults or other children.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, including adequate food, clothing, shelter, supervision, medical care, protection from harm or emotional responsiveness.

Exploitation and modern slavery

Includes situations in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into activity that benefits others. This may be criminal, sexual, financial or labour exploitation and may occur online or offline.

Indicators may include, but are not limited to:

- unexplained injuries or changes in physical presentation
- significant changes in mood, behaviour, engagement or relationships
- fearfulness, withdrawal, distress or hypervigilance
- changes in attendance or repeated/prolonged non-engagement
- going missing from home, care, education or sessions
- unexplained money, gifts, phones, clothing or possessions
- association with older individuals, groups or networks
- substance misuse
- sexualised behaviour or language that causes concern
- online threats, coercion, harmful contact or image-sharing
- signs of neglect, hunger, poor hygiene or unmet medical need
- expressions of self-harm, suicide or significant hopelessness
- concerns about coercive or controlling relationships
- carrying weapons, involvement in violence or fear of retaliation.

Children may also cause harm to family members, including child-to-parent or caregiver abuse. This should be responded to through a safeguarding lens that considers risk, the needs of all involved and any underlying harm experienced by the child.

8. Early Help, Family Help and Escalation

Nudge Education seeks to identify emerging needs early and support young people and families to access appropriate help before concerns escalate. This may include universal or community-based early help, or more targeted support through Family Help.

Family Help brings together targeted early help and support provided under Section 17 of the Children Act 1989. Nudge Education will work with commissioners and other agencies to contribute to assessments and plans where requested and appropriate.

Staff should be particularly alert to young people who:

- are disabled, have SEND or certain health conditions
- have a mental health need
- are young carers
- are pregnant or are a parent
- show early signs of abusive, violent or harmful behaviour
- are being drawn into anti-social behaviour, gangs, organised crime or county lines
- are frequently missing from education, home or care
- have experienced repeated suspension, part-time education, exclusion or alternative provision
- are at risk of exploitation, modern slavery or trafficking
- are at risk of radicalisation
- have a parent or carer in custody or are affected by parental offending
- are living with family challenges, including substance misuse, adult mental health needs or domestic abuse
- are at risk of honour- or faith-based abuse, FGM or forced marriage
- are privately fostered.

Where Nudge Education identifies an emerging safeguarding need, the concern should be shared with the RDSL in line with Nudge Education's safeguarding reporting procedures. The appropriate commissioner contact should also be informed, with communication led by the EIC or RDSL as appropriate to the nature of the concern.

Where a young person or family is already receiving Early Help or Family Help, Nudge Education will contribute relevant information and participate in assessments and plans where requested and appropriate. The existence of Early Help or Family Help arrangements must not delay further safeguarding escalation or referral where concerns increase.

Where there is reasonable cause to suspect that a young person is suffering, or is likely to suffer, significant harm, child protection procedures apply. The RDSL will consider the need for referral to local authority children's social care and/or the police without delay.

9. Responding to a concern or disclosure

If a young person tells a member of staff about abuse, neglect, exploitation or another safeguarding concern, the member of staff should:

- Listen calmly and give the young person time to speak.
- Take the young person seriously. Do not minimise, dismiss, blame or express disbelief.
- Reassure them that they have done the right thing by speaking and that they will be supported.
- Do not promise confidentiality. Explain that information may need to be shared with people who can help keep them safe.
- Do not investigate. Use only open, necessary questions to clarify what the young person is saying.

- Do not ask leading questions, repeatedly question the young person or seek to establish proof.
- Make a factual record as soon as possible, using the young person's own words where important.
- Report the concern immediately through Nudge Education's safeguarding process and seek RDSL advice.
- If a child is in immediate danger or requires urgent medical attention, contact emergency services without delay.
- Continue to support the young person and follow any safety plan or direction agreed with safeguarding professionals.
- Where staff are concerned but there has been no disclosure, they should still report the concern. Professional curiosity and patterns of information can be as important as a direct disclosure.

10. Recording, information sharing and confidentiality

Safeguarding records must be clear, factual, timely and stored on approved Nudge Education systems. Records should distinguish between what was observed, what was reported by another person, professional opinion and historic information.

Every safeguarding record should include, where relevant:

- a clear summary of the concern
- date, time and context
- the young person's own words where relevant
- actions taken and by whom
- who information was shared with
- decisions made, including decisions not to refer
- the rationale for those decisions
- outcomes and any follow-up required

Safeguarding information is confidential but not secret. Information should be shared where it is necessary, proportionate and lawful to safeguard or promote a young person's welfare. Staff must not allow uncertainty about data protection to prevent appropriate safeguarding action and should seek advice from the RDSL where they are unsure.

Parents/carers should normally be informed about safeguarding concerns and referrals unless doing so could place a young person or another person at increased risk, prejudice an investigation, or otherwise be contrary to the young person's welfare. Advice should be sought from the RDSL or relevant statutory agency where necessary.

11. Working with parents, carers, commissioners and other agencies

Nudge Education works as part of a wider safeguarding system. No single practitioner or organisation will hold the complete picture of a child's circumstances.

Commissioner safeguarding contacts and local referral routes should be identified at the start of an intervention wherever possible.

Nudge Education will comply with relevant local multi-agency safeguarding arrangements and commissioner procedures.

Nudge Education may refer directly to local authority children's social care, police, Prevent or other statutory services where required; commissioner notification must not delay action needed to protect a child.

Nudge Education will contribute relevant information to assessments, strategy discussions, child protection enquiries, Family Help plans and other multi-agency processes where appropriate.

Where a commissioner response does not adequately address an identified risk, the RDSL should use professional challenge and local escalation procedures.

Where a young person is placed with Nudge Education by a school, local authority or other body, the commissioner retains its own safeguarding responsibilities. Nudge Education's responsibilities operate alongside, not instead of, those duties.

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

Child-on-child abuse is a safeguarding issue. It can occur between two children or within groups and may happen face to face, online or across both environments. Nudge Education recognises that it can occur even where most interventions are delivered one-to-one.

It may include:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying
- physical abuse
- abusive, harassing, misogynistic or misandrist messages
- sexual harassment and sexual violence
- harmful sexual behaviour
- making or sharing nudes or semi-nudes without consent
- upskirting
- initiation or hazing-type violence or rituals
- teenage relationship abuse, coercion, control or stalking
- threats or serious violence, including weapon-related harm
- exploitation of one child by another

Staff must never dismiss harmful behaviour as banter, part of growing up or an inevitable part of adolescence. The absence of a report does not mean harmful behaviour is not occurring.

Nudge Education will consider the safety, wishes and support needs of the child harmed and the needs and risks associated with the child who has displayed harmful behaviour. A

child who causes harm may also have experienced abuse, exploitation or trauma. This does not minimise the impact on the child harmed.

Staff should not conduct their own investigation. Immediate safety should be secured, the concern recorded and the RDSL informed. The RDSL will determine appropriate referral, risk management, commissioner communication and support.

Any restorative approach must be carefully risk assessed and should not be used where it could pressure, blame or further harm a child.

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

Making or sharing nudes and semi-nudes may include photographs, videos, livestreams, or imagery that has been digitally altered or generated using artificial intelligence, including deepfakes.

If an incident is reported or discovered, staff should:

- not view imagery unless there is an exceptional safeguarding reason and this has been agreed through the safeguarding process
- never copy, print, forward, save, download or ask a young person to send the imagery to them
- not ask the young person to reproduce or display the image
- not investigate the device or search for further imagery
- not blame or shame any young person involved
- report immediately to the RDSL and record what has been disclosed
- follow safeguarding advice regarding preservation/deletion of imagery, parents/carers, police and commissioner involvement.

All incidents require a safeguarding response. The response will take account of consent, coercion, age and developmental difference, vulnerability, threats, distribution, exploitation, whether AI has been used to create false sexual imagery, and any wider risk.

14. Child criminal and sexual exploitation (CCE and CSE), serious violence, trafficking and modern slavery

Children can be exploited even where activity appears consensual or where they have committed offences. Nudge Education will approach exploitation through a child-first safeguarding lens.

Child criminal exploitation can include county lines, drug or money movement, theft, vehicle crime, fraud, financial exploitation and serious violence.

Child sexual exploitation can occur through relationships, groups or networks and can be facilitated online.

Children may be coerced into carrying weapons or may carry them because they fear harm. Staff must report concerns about a child carrying or intending to use a weapon to the DSL, who risk-assesses and safety-plans.

Trafficking and modern slavery may involve movement, control, labour, criminal or sexual exploitation.

Group-based exploitation may involve multiple adults and/or children and can cross local authority boundaries.

Girls and boys may experience exploitation differently and indicators may vary.

Concerns about exploitation or serious violence must be reported to the RDSL. Where there is immediate risk, a weapon, threat to life or suspected crime requiring urgent action, police should be contacted.

If a young person is to be interviewed or searched by police and an appropriate adult is required, Nudge Education will work with the commissioner and relevant agencies to ensure suitable arrangements are in place. Nudge Education staff should not assume this role without appropriate consideration of the young person's interests, role boundaries and relevant guidance.

15. Domestic abuse and teenage relationship abuse

Children can be victims of domestic abuse in their own right. They may see, hear or experience the effects of abuse in the home or experience abuse in their own intimate relationships.

Domestic abuse can include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological or emotional abuse. Technology may be used to monitor, threaten, humiliate or control.

Any information indicating domestic abuse should be considered alongside the child's wider circumstances and shared with the RDSL. Nudge Education will work with commissioners and statutory agencies and will respond appropriately to Operation Encompass information where it is lawfully shared with Nudge Education.

16. Honour- or faith-based abuse, FGM and forced marriage

Abuse may be justified or framed by an individual or group in the name of honour, culture, faith or belief. Such explanations never reduce the safeguarding responsibility to protect a child.

16.1 Female genital mutilation (FGM)

FGM is illegal and is a form of child abuse. Staff must report any concern that a girl may be at risk of FGM, may have undergone FGM or is being taken abroad for the purpose of FGM to the RDSL immediately and make a personal report to the police themselves.

A separate statutory mandatory reporting duty applies to specified regulated professionals, including teachers and regulated health and social care professionals, where in the course of their professional duties they discover that FGM appears to have been carried out on a girl under 18. Not every Nudge Education practitioner automatically falls within that statutory category. Any staff member who may personally be subject to the duty must follow the statutory reporting requirements as well as informing Nudge Education safeguarding. All other staff must immediately escalate the concern through Nudge Education's safeguarding process.

Staff must never examine a child to determine whether FGM has occurred.

16.2 Forced marriage

Forced marriage is a marriage in which one or both people do not or cannot give free and full consent. Coercion may be physical, emotional, psychological, financial or sexual. Staff must take concerns seriously and must not approach family members or attempt mediation where doing so may increase risk. Concerns should be referred immediately to the RDSL, who will seek specialist or statutory advice as appropriate.

17. Prevent and Channel

Nudge Education recognises its role in safeguarding young people from radicalisation into terrorism. Radicalisation is treated as a safeguarding concern and should be considered in the context of the young person's wider needs and vulnerabilities.

All relevant staff will receive Prevent awareness appropriate to their role.

Concerns about radicalisation must be reported to the RDSL.

The RDSL will consider commissioner notification, local Prevent referral routes and Channel processes.

Where there is an immediate threat or risk of terrorism, emergency police procedures apply.

Staff must avoid stereotyping or making assumptions based on religion, ethnicity, culture or political expression. Concerns should be based on behaviour, context and risk.

18. Online safety, filtering, monitoring, mobile technology and AI

Technology is a significant component of safeguarding. Harm may occur wholly online or technology may facilitate offline abuse. Nudge Education considers online risk through the four broad areas of content, contact, conduct and commerce.

18.1 Safe digital practice

Staff must use approved systems and devices in accordance with Nudge Education policies.

Young people's use of technology during sessions should be supervised and proportionate to age, need, context and assessed risk.

Unsecured or inappropriate public networks should not be used for work with young people where this creates avoidable risk.

Personal devices must not be used in ways that breach professional boundaries, confidentiality or information governance.

Staff must understand the online safeguarding risks and responsibilities relevant to their role.

More guidance on this is provided in our [digital conduct and communications policy](#).

18.2 Filtering and monitoring

Where Nudge Education owns or manages devices or internet access used by young people, appropriate filtering and monitoring arrangements will be maintained. These arrangements will be reviewed at least annually and following any significant change or incident. Reviews will consider effectiveness, the age and vulnerability of young people, access routes, known risks, over-blocking and the ability to identify and escalate concerning activity.

Young people enrolled with Nudge Education Online (NEO) are provided with a Nudge Education managed device. These devices are subject to Nudge Education's filtering and monitoring arrangements.

Where a young person receives online tuition from Nudge Education but is not enrolled with NEO, delivery operates on a bring-your-own-device basis. Nudge Education does not therefore manage the device or the filtering and monitoring arrangements applied to it. Practitioners must continue to follow Nudge Education's online safeguarding expectations and report any concerns arising during online delivery in accordance with this policy.

Responsibility for technical controls does not remove the need for practitioner supervision, professional curiosity and appropriate safeguarding action.

For further information regarding NEO-specific safeguarding arrangements, see the [NEO Online Safety and Acceptable Use Policy](#).

18.3 Mobile technology

Nudge Education recognises that mobile phones and other personal devices can present safeguarding, privacy and professional boundary risks during interventions.

Young people must not have unsupervised access to ICT or mobile technology during Nudge Education sessions. Where technology is used as part of an intervention, practitioners must provide appropriate supervision and remain alert to harmful, illegal or inappropriate content and other online safeguarding risks. Any online safeguarding concern identified during a session must be reported in accordance with Nudge Education's safeguarding procedures.

We understand that KCSIE 2026 expects settings to be phone-free by default with exceptions documented. Given that Nudge is primarily a home and community delivery, this is a departure from this guidance. We will work with commissioners to set expectations about phone usage upon the start of the transition phase of any intervention.

Practitioners must maintain clear professional boundaries in relation to personal devices and digital communication. Personal contact details and social media accounts must not be shared with young people, parents or carers, and personal devices must not be used for direct communication with young people or families. Young people must not be permitted to use a practitioner's personal device.

Additional safeguards apply where personal or intimate care is being provided. Personal mobile phones and electronic devices must remain out of sight and must not be used to photograph or record a young person during personal or intimate care.

Staff and practitioners must follow the more detailed requirements relating to mobile technology, digital communication, photography and professional boundaries contained within relevant Nudge Education policies and procedures.

18.4 Generative artificial intelligence

Young people may only use generative AI within Nudge Education activity where this is appropriate, supervised and has a clear educational purpose.

AI-generated content must be treated as potentially inaccurate, biased, manipulative or harmful and should be critically evaluated.

Personal, identifying, confidential or safeguarding information about young people, families or staff must not be entered into unapproved generative AI systems.

AI must not replace professional safeguarding judgement, risk assessment, mental health assessment or decision-making.

AI must not be used to impersonate, humiliate, sexualise or target another person.

Concerns involving AI-generated sexual imagery, deepfakes, harmful outputs, grooming or exploitation are safeguarding concerns and must be reported.

New organisational uses of AI involving young people or sensitive data require appropriate governance and risk assessment. For further information please refer to the [NEO Artificial Intelligence Policy](#).

19. Children who may be at greater risk of harm

Any child can experience abuse or exploitation. Some children may face additional barriers to recognition, disclosure, support or protection. Staff must avoid assumptions and consider each young person's individual circumstances.

19.1 SEND, disability and health conditions

Changes in presentation must not automatically be attributed to a disability, diagnosis or SEND.

Communication needs may affect how a young person expresses distress or discloses harm.

Children with SEND may be more vulnerable to bullying, isolation, exploitation and online harm.

Additional support or reasonable adjustments may be needed to enable a young person to communicate safely.

Medical needs, including dependence on adults for care or medication, may create additional safeguarding considerations.

19.2 Young carers

Young carers may experience hidden pressures, inappropriate caring responsibilities, reduced attendance or isolation. Staff should consider whether support is required for the young person and family.

19.3 Children in care, previously in care, kinship care and private fostering

Staff should understand relevant care arrangements and work with commissioners, social workers, Virtual School Heads and carers where applicable. Placement changes, missing episodes and instability should be considered through a safeguarding lens.

19.4 Sexual orientation and gender questioning

A young person being lesbian, gay or bisexual, or questioning their sexual orientation or gender, is not in itself a safeguarding risk. However, young people who are, or are perceived to be, lesbian, gay, bisexual or gender questioning may experience bullying, discrimination, abuse or isolation.

Staff should provide a safe and non-judgemental response, avoid assumptions and remain alert to any safeguarding concerns. Any response should consider the individual circumstances, needs and best interests of the young person.

Where a young person is questioning their gender, staff should respond sensitively and consider the young person's individual circumstances and any wider safeguarding needs. Where a young person requests support with social transition, advice must be sought from the RDSL before any decisions or changes are made. Parents or carers should be involved in the vast majority of cases. Where there is concern that involving parents or carers may place the young person at greater risk of harm, the RDSL should determine the appropriate safeguarding response before parents or carers are contacted, and the rationale for the decision should be recorded. Staff should have regard to the safeguarding principles set out in *Keeping Children Safe in Education 2026*². While Nudge Education is not a school or college and KCSIE does not apply to Nudge Education in the same way, Nudge Education uses the guidance as an important benchmark for safeguarding practice.

Information about a young person's sexual orientation or gender questioning should be handled sensitively and shared only where necessary and appropriate for safeguarding or support.

19.5 Children affected by parental offending or custody

Staff should be alert to the emotional, practical and safeguarding impact on children where a parent or carer is in custody or involved in offending.

20. Mental health and safeguarding

Mental health concerns can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Equally, not every mental health need is a child protection concern.

Staff should notice significant changes in presentation, mood, functioning, relationships or engagement.

Only appropriately qualified professionals should diagnose mental health conditions. Concerns about self-harm, suicidal thoughts, significant deterioration or risk to others must be escalated promptly.

Where there is immediate risk to life or serious injury, emergency services should be contacted.

Safeguarding and mental health support should be coordinated where both are required. Staff should use trauma-informed, non-stigmatising language and should not make assumptions about intent.

² Department for Education, [Keeping Children Safe in Education 2026](#), section on children who are questioning their gender.

21. Attendance, non-engagement and children missing education

Because Nudge Education works with young people who are chronically disengaged from education, non-attendance must be interpreted in context. It must never be normalised to the point that safeguarding indicators are missed.

Repeated or prolonged absence, sudden changes in engagement, inability to see or speak with a young person, unexplained changes of address, patterns of cancelled sessions or information suggesting the child may be missing from home/care should trigger professional curiosity.

The response should be based on risk and should not wait for a fixed threshold where safeguarding concerns arise. Staff and EICs should consider:

- the young person's known safeguarding history and current vulnerabilities
- whether the absence is expected and explained
- whether Nudge Education or another trusted professional has had recent direct contact with the young person
- patterns or changes in attendance
- known family, exploitation, domestic abuse or missing risks
- whether the commissioner and wider professional network are aware
- whether immediate welfare checks or statutory referrals are required.

Safeguarding concerns arising from non-attendance or non-engagement must be acted upon as soon as they are identified. Where Nudge Education has been unable to see or speak directly with a young person for two consecutive planned sessions, a safeguarding concern must be raised with the RDSL unless their welfare and reason for absence have been satisfactorily established through the commissioner or by an Education Intervention Coordinator.

Where Nudge Education cannot establish the young person's welfare and there is safeguarding concern, this must be escalated to the RDSL without waiting for a set number of days or sessions. The commissioner should be informed promptly, and local children missing education, missing-from-home/care or social care procedures followed as appropriate.

21.1 Young person leaving or going missing during a session

Where a young person leaves a session unexpectedly or their whereabouts become unknown during planned Nudge Education delivery, the practitioner must consider the immediate level of risk and act in accordance with the young person's risk assessment and agreed intervention arrangements.

The practitioner should not place themselves or others at risk by attempting to physically prevent a young person from leaving or by pursuing them in circumstances where it would be unsafe to do so.

The EIC must be informed promptly and the RDSL contacted where there is a safeguarding concern. Parents/carers, the commissioner, police or other statutory services should be contacted as appropriate to the circumstances and level of risk.

Where there is immediate danger, significant vulnerability or reason to believe the young person may come to harm, staff must not delay necessary action while attempting to contact a particular individual within Nudge Education.

The incident, actions taken and rationale for decisions must be recorded promptly, and the young person's risk assessment and intervention arrangements reviewed before further delivery where appropriate.

22. Physical intervention, professional touch and safe practice

Nudge Education does not advocate physical contact, including hugging, as part of routine practice. Practitioners should use trauma-informed, non-physical de-escalation and relational approaches wherever possible.

Where a young person has identified sensory, communication or regulation needs, appropriate resources and agreed strategies should be considered as part of intervention planning and risk assessment to reduce the need for physical intervention.

Physical intervention may only be used as a last resort where it is lawful, necessary and proportionate to prevent harm, and only the minimum force necessary may be used. Staff expected to work in circumstances where physical intervention may reasonably be required must have appropriate training.

Every use of physical intervention must be reported and recorded promptly.

Any injury, distress, safeguarding concern or allegation arising from physical intervention must be escalated.

Physical contact must always be professionally justifiable, appropriate to the young person's needs and consistent with the Code of Conduct.

Where practitioners transport young people as part of an intervention, they must follow Nudge Education's requirements for safe transport, lone working and professional boundaries.

22.1 Professional boundaries and positions of trust

Nudge Education practitioners hold a position of trust in relation to the young people they work with. That trust arises from the practitioner's role, the young person's vulnerability and the unsupervised nature of much of Nudge Education's delivery, and it does not depend on the young person's age.

Any sexual/romantic relationship or anything that may be judged to be a friendship which overreaches the boundaries expected and explained in the practitioner code of conduct, between a member of staff and a young person supported by Nudge Education is

prohibited. This applies irrespective of the young person's age, irrespective of whether they are over 16 or over 18, and irrespective of apparent consent. Consent is not a defence to a breach of this policy. Staff must not pursue or encourage such a relationship, and must not use their role to create emotional dependency, favouritism or private contact outside agreed arrangements.

The prohibition applies throughout the intervention and for a period of twelve months after Nudge Education's involvement with the young person ends.

Where a member of staff has a pre-existing personal, family or social connection to a young person or their family, they must disclose it to their line manager and the RDSL before work begins, so that a decision can be taken about whether the allocation is appropriate. Where a relationship develops or an approach is made by a young person or a family member, the member of staff must report it immediately and must not continue delivery pending advice from the RDSL.

Certain positions of trust are recognised in criminal law under the Sexual Offences Act 2003. Nudge Education's expectations do not depend on whether a criminal offence is made out. Conduct of this kind will always be treated as a safeguarding matter under Section 23 of this policy, will always be referred to the Local Authority Designated Officer, and may result in referral to the police, dismissal and referral to the Disclosure and Barring Service.

23. Allegations and safeguarding concerns about adults working with children

Nudge Education takes seriously any allegation or safeguarding concern about the conduct of a member of staff or practitioner working for or on behalf of Nudge Education. Concerns and allegations about adults working with children will be managed in accordance with this policy and the Managing Allegations Against Staff Policy.

A concern may meet the harm threshold where an adult has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Concerns may relate to conduct within or outside of Nudge Education. Behaviour outside of work should be considered where it may indicate a transferable risk to children.

Any such concern must be reported immediately to the RDSL and appropriate senior leader. The RDSL will consider whether consultation or referral to the relevant Local Authority Designated Officer (LADO), commissioner safeguarding lead, police and/or children's social care is required, involving the appropriate senior leader and escalating to the NDSL where necessary.

Where the concern relates to an RDSL, it must be reported directly to the NDSL. Where the concern relates to the NDSL, it must be reported directly to the Chief Executive Officer. Where the concern relates to the Chief Executive Officer, it must be reported through the appropriate senior governance route. In all cases, consultation or referral to the LADO must take place where required.

The welfare of the young person is the primary consideration. Nudge Education will take appropriate steps to protect the young person while ensuring that concerns are managed fairly, proportionately and without compromising any statutory investigation.

Nudge Education will work with the LADO, commissioner, police, children's social care, HR and other relevant agencies as appropriate. Internal investigation or disciplinary action must not prejudice a statutory safeguarding or criminal investigation.

Concerns which do not meet the harm threshold will be managed in accordance with Section 24 of this policy.

Where an allegation or safeguarding concern arises, the individual must provide Nudge Education with details of any other current employment or professional engagement involving work with children or adults at risk. This information will be considered as part of safeguarding decision-making and any necessary information sharing or referral to another organisation or statutory body.

Where an individual is removed from regulated activity, or would have been removed had they resigned, ceased working or otherwise left Nudge Education, Nudge Education will make a referral to the Disclosure and Barring Service (DBS) where the statutory referral criteria are met.

Where the individual is a teacher and the circumstances may amount to serious teacher misconduct, Nudge Education will also consider whether a referral to the Teaching Regulation Agency (TRA) is appropriate in accordance with current referral guidance. Referral to the DBS, TRA or another professional or regulatory body does not replace any requirement to notify or refer to the LADO, police, children's social care, commissioner or other relevant safeguarding body.

24. Low-level concerns

A low-level concern is any concern, however small, that an adult working with children may have acted in a way that is inconsistent with the Code of Conduct, including inappropriate conduct outside work, even where the behaviour does not meet the harm threshold.

Examples may include:

- being over-friendly with a young person
- having favourites or creating inappropriate dependency
- taking photographs contrary to policy
- engaging with a young person through personal social media or private messaging
- using sexualised, humiliating, intimidating or inappropriate language
- unnecessary or inappropriate physical contact
- sharing personal information or behaving in a way that blurs professional boundaries.

Low-level does not mean insignificant. Concerns must be reported promptly through the agreed safeguarding/management route so that patterns can be identified. Records will be reviewed to determine whether conduct, training, disciplinary, safeguarding or LADO action is required.

25. Whistleblowing

All staff have a responsibility to raise concerns about unsafe practice, safeguarding failures or the conduct of colleagues. Staff should use Nudge Education's Whistleblowing Policy and safeguarding routes.

Where a member of staff feels unable to raise a safeguarding concern internally, or believes a concern has not been addressed appropriately, they may use external whistleblowing routes, including the NSPCC Whistleblowing Advice Line where applicable.

No member of staff should suffer detriment for raising a genuine safeguarding concern in good faith.

26. Safer recruitment and ongoing suitability

Nudge Education will maintain robust safer recruitment and suitability arrangements in accordance with its Safer Recruitment Policy and applicable law.

- identity, right-to-work, employment history and reference checks
- enhanced DBS and barred-list checks where the role is eligible/regulated activity
- overseas checks where relevant
- qualification/professional status checks where required
- values-based and safeguarding-focused selection
- consideration of publicly available online information where lawful, proportionate and relevant
- appropriate recording of checks on the central recruitment record
- ongoing expectations that staff disclose matters relevant to their suitability to work safely with children, in line with HR policy.
- At least one person involved with the interviewing panel has completed safer recruitment training

Changes to the legal definition and scope of regulated activity must be reflected in recruitment processes. Nudge Education will not rely on outdated assumptions about supervision removing the need for regulated-activity checks for staff and volunteers.

Concerns arising after appointment will be considered under safeguarding, conduct, disciplinary and referral procedures as appropriate.

27. Safeguarding adults

Nudge Education primarily supports people under 18, but may work with young adults or encounter adults at risk within family homes or community contexts. An adult at risk is a person aged 18 or over who has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves against it. Such concerns must be reported to the RDSL and referred to the relevant local authority adult safeguarding team, which has a duty under section 42 of the Care Act 2014 to make enquiries. Where there is an immediate risk to an adult's safety, emergency services must be contacted. Adult safeguarding concerns must be recorded on approved Nudge Education systems in the same way as concerns about children.

Staff whose role includes direct contact with adults at risk should receive adult safeguarding training appropriate to their role. Child and adult safeguarding concerns may overlap within the same household and should be considered together where relevant.

28. Health and safety and intervention risk management

Safeguarding and health and safety are connected but not interchangeable. Nudge Education's Health and Safety, Lone Working and intervention risk-assessment arrangements support the safe delivery of interventions.

Risk assessments should reflect the individual young person, location, activity, transport, known safeguarding considerations and practitioner factors relevant to safe delivery. Risk assessment is dynamic and should be updated when circumstances change. Environmental, community and online risks should be considered alongside risks within the home.

Practitioners must not enter or deliver an intervention from within a young person's bedroom. Where a young person is unable or unwilling to leave their bedroom, alternative arrangements may be agreed to enable safe engagement without the practitioner entering the room.

Any such arrangement must be specifically agreed as part of the intervention arrangements, reflected within the risk assessment and supported by clear safeguarding, lone-working and professional-boundary mitigations. These mitigations must be followed at all times. Examples may include a practitioner engaging with the young person from outside the bedroom, such as from the landing or doorway, with another appropriate adult present throughout the interaction.

Any change in circumstances or risk must be reported and the arrangements reviewed. Practitioners must comply with the Practitioner Code of Conduct and relevant lone-working requirements throughout.

Near misses, incidents and changes in risk should be reported so that learning and controls can be updated.

Where risk cannot be safely managed, staff should withdraw from the immediate situation and seek appropriate support rather than continuing an unsafe intervention.

29. Monitoring, quality assurance and review

The Directorate and safeguarding leadership will monitor the effectiveness of this policy and safeguarding practice using a range of evidence.

- safeguarding records, themes and outcomes
- referral and escalation activity
- allegations and low-level concerns
- training completion and learning
- quality assurance/support visits
- feedback from young people, parents/carers and commissioners
- internal and external safeguarding audits
- commissioner due-diligence and quality assurance
- learning from incidents, complaints and near misses
- changes in legislation, statutory guidance and national standards.

The policy will be reviewed at least annually and earlier where required. Significant changes will be communicated to staff and embedded through training, briefings and operational guidance.

This policy has been reviewed and Approved by:

Diego Melo: Chief Executive Officer

Brian Mair: Director of Operations - Nudge Education

Date: 15 September 2026

Version Control

Version	Date	Details of Change(s)	Approved By
2.0	5/12/2025	Implementation of V2 policy	Brian Mair
2.1	27/4/2026	Update to National DSL details	Brian Mair
2.2	24/08/2026	Full rewrite: safeguarding-led structure; alignment to KCSIE 2026, Working Together 2026 and current Nudge Education practice	Pending

Annex 1. Staff safeguarding response

If you are worried about a young person:

- Consider immediate safety. If there is immediate danger or urgent medical need, call 999.
- Listen and observe. Do not investigate.
- Record the concern factually and promptly.
- Report the concern to the RDSL through the approved safeguarding route.
- Do not delay necessary action. If the concern is urgent and the appropriate safeguarding contact cannot be reached, contact the relevant statutory service directly where required and inform the RDSL or other appropriate safeguarding contact as soon as possible.
- Follow safeguarding advice regarding communication with the commissioner, parents/carers and statutory agencies.
- Do not wait for a weekly report or routine meeting where the concern requires same-day action.
- Continue to support the young person and complete any agreed follow-up.

There is no 'low-risk list' that overrides professional judgement. Several apparently minor concerns, a change from the young person's usual presentation, or a concern combined with known vulnerability may require immediate safeguarding escalation.

Annex 2. Direct disclosure guidance

- Stay calm and listen.
- Believe the young person enough to act. You are not deciding whether an allegation is proven.
- Use the young person's own language and avoid leading questions.
- Do not ask 'why' questions that may feel blaming.
- Do not promise to keep the information secret.
- Explain what will happen next in a way the young person can understand.
- Do not confront the person alleged to have caused harm.
- Write down what was said as soon as possible, separating fact from opinion.
- Report immediately to safeguarding.
- Seek advice before contacting parents/carers where this could increase risk.

Annex 3. Attendance/non-engagement safeguarding response

When a young person does not attend or repeatedly disengages:

- Establish what is known: reason for absence, recent contact, known risks and whether another professional has seen/spoken with the young person.
- Notify the EIC/commissioner in line with intervention arrangements.
- Consider whether the pattern itself creates or increases safeguarding concern.
- Escalate to the RDSL immediately where welfare cannot be established, the absence is unexplained in the context of vulnerability, or there are indicators of neglect, exploitation, domestic abuse, missing episodes or other harm. Where Nudge Education has been unable to see or speak directly with a young person for two consecutive planned sessions, a safeguarding concern must be raised with the RDSL unless their welfare and reason for absence have been satisfactorily established through the commissioner or an Education Intervention Coordinator.
- Follow commissioner/local missing education, missing from home/care or social care procedures where relevant.
- Record actions, decisions and rationale.
- Review risk and intervention arrangements before resuming delivery where circumstances have changed.

Annex 4. Allegations and low-level concerns route

Concern	Immediate route	Possible next steps
May meet harm threshold	RDSL + appropriate senior leader immediately	LADO consultation/referral; commissioner safeguarding lead; police/social care where required; HR; interim safeguarding measures; escalation to NDSL where necessary
Does not appear to meet harm threshold / boundary concern	Report promptly through Nudge Education's low-level concern route	Record; pattern review; supervision/training/management action; LADO advice where the threshold is unclear or concerns increase
Concern about an RDSL	NDSL immediately	LADO consultation/referral where required; commissioner; police/social care where required; HR; interim safeguarding measures

Concern about the NDSL	CEO immediately	LADO consultation/referral where required; independent management of concern; statutory/HR action as required
Concern about the CEO	Appropriate senior governance route immediately	LADO consultation/referral where required; independent management of concern; statutory/HR action as required

Annex 5. Key external guidance

Core documents used in this rewrite:

- Keeping Children Safe in Education 2026 Department for Education
- Working Together to Safeguard Children 2026 Department for Education
- Non-school Alternative Provision: Voluntary National Standards Department for Education
- Information Sharing Advice for Safeguarding Practitioners Department for Education
- Prevent Duty and Channel guidance
- UKCIS guidance on sharing nudes and semi-nudes
- Filtering and Monitoring Standards for Schools and Colleges, used as a benchmark where relevant to Nudge-managed technology
- Local multi-agency safeguarding arrangements and commissioner procedures