



Safeguarding and Child Protection Policy

Setting: The Lodge

Organisation: PJ Creative Learning Ltd

Designated Safeguarding Lead (DSL): Paula Johnson

Policy Owner: PJ Creative Learning Ltd

Policy Version: Version 1.1

Date Approved: 18 May 2026

Last Reviewed: September 2026

Next Review: September 2027

Status: Live

This policy is reviewed at least annually, and sooner where safeguarding law, statutory guidance, local procedures or the way The Lodge operates changes.

Contents

Important Contacts

1. Aims
 2. Legislation and Statutory Guidance
 3. Definitions
 4. Equality Statement
 5. Roles and Responsibilities
 6. Confidentiality
 7. Recognising Abuse and Taking Action
 8. Online Safety and the Use of Technology
 9. Notifying Parents or Carers
 10. Record Keeping and Information Sharing
 11. Learners with SEND, Disabilities or Health Needs
 12. Looked After and Previously Looked After Children
 13. Safer Recruitment and Staff Conduct
 14. LGBTQ+ and Gender Questioning Learners
 15. Whistleblowing and Raising Concerns
 16. Complaints and Concerns about Safeguarding
 17. Safeguarding Training
 18. Monitoring Arrangements
 19. Compliance with the Law
 20. Links with Other Policies
- Appendix 1. Types of Abuse
- Appendix 2. Safer Recruitment and DBS Checks
- Appendix 3. Allegations Against Adults and Low Level Concerns
- Appendix 4. Specific Safeguarding Issues
- Appendix 5. Lone Working and Safeguarding
- Guidance Used for the September 2026 Review

Important Contacts

Designated Safeguarding Lead	Paula Johnson Email: lodge@pjcreativelearning.co.uk
Immediate danger	Call 999 for police, ambulance or fire service.
Coventry MASH	024 7678 8555 during office hours. Coventry currently states 8.30 am to 5 pm Monday to Thursday and 8.30 am to 4.30 pm Friday.
Emergency Duty Team	024 7683 2222 outside normal office hours.
Local Authority Designated Officer	Formal notifications are made through the Coventry online reporting form. Advice email: lado@coventry.gov.uk .
Prevent and extremism advice for education settings	020 7340 7264 Email: counter.extremism@education.gov.uk
NSPCC Helpline	0808 800 5000 Website: www.nspcc.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285 Email: help@nspcc.org.uk
Childline	0800 1111 Free support for children and young people.
Police	101 for non emergency matters. Use 999 where there is immediate danger.

Anyone who believes that a child is at immediate risk must act without delay. Internal reporting should never prevent direct contact with children's social care or the police where this is needed to protect a child.

1. Aims

At The Lodge, we are fully committed to safeguarding and promoting the welfare of every child and young person who accesses our setting.

This policy sets out how we meet our legal, moral and professional responsibilities to protect children from harm and to ensure that every learner feels safe, respected and supported while attending sessions with us. Safeguarding and promoting the welfare of children is everyone's responsibility. Every adult working with children at The Lodge has a duty to act in the best interests of the child and to respond appropriately to any concerns about their safety, welfare or wellbeing.

We believe that all children have the right to learn and develop within an environment that is physically and emotionally safe, calm, respectful and consistent, regardless of their background, identity, additional needs or life experience. Our safeguarding approach is child centred, trauma informed and responsive to the needs of learners, many of whom have SEND and or SEMH needs.

This policy ensures that appropriate action is taken quickly to safeguard and promote the welfare of children attending The Lodge. It also ensures that children are protected from abuse, neglect, exploitation and other safeguarding risks, that concerns are recognised early and responded to appropriately, and that clear systems for reporting, recording, information sharing and escalation are understood and followed by all adults working in the setting.

This policy also ensures that learners experience safe, respectful and consistent relationships with trusted adults, that safeguarding is embedded in daily practice, and that the lived experience, communication and voice of each child remain central to all safeguarding decisions.

The Lodge is a dedicated site offering commissioned, part time, one to one educational support. We are not a registered school and we do not provide full time education. Learners remain on roll at their main education setting or have education arranged by the relevant local authority.

The learner's main education setting or commissioning body retains its own responsibilities for the learner's wider education and safeguarding arrangements. The Lodge has an equal responsibility to act promptly on any concern that arises during our work and to share information with the right people when this is needed to keep a child safe.

We are committed to strong partnership working, timely information sharing and clear professional accountability. We want safeguarding at The Lodge to feel visible and dependable to learners, families, referring settings and professionals, rather than something that exists only in a policy.

2. Legislation and Statutory Guidance

This policy is informed by current safeguarding law, statutory guidance and local procedures in England. The principal national guidance is Working Together to Safeguard Children 2026. The Lodge also uses Keeping Children Safe in Education 2026 as an important safeguarding and safer recruitment benchmark so that our practice works safely alongside the expectations of referring schools and colleges. Keeping Children Safe in Education is statutory for schools and colleges. The Lodge does not present itself as a registered school or college.

Relevant guidance also includes Information Sharing to Safeguard Children and Young People 2026, What to do if you are worried a child is being abused, Prevent duty guidance, guidance for out of school settings, the voluntary national standards for non school alternative provision where useful as a benchmark, and procedures published by Coventry Safeguarding Children Partnership and Coventry City Council.

The legal framework includes the Children Act 1989, the Children Act 2004, the Children and Social Work Act 2017, the Equality Act 2010, the Human Rights Act 1998, the Counter Terrorism and Security Act 2015, the Female Genital Mutilation Act 2003, the Forced Marriage Act 2007, the Safeguarding Vulnerable Groups Act 2006, the Rehabilitation of Offenders Act 1974, the Sexual Offences Act 2003, the Modern Slavery Act 2015, the Crime and Policing Act 2026, the Data Protection Act 2018, the United Kingdom General Data Protection Regulation and the Data Use and Access Act 2025.

The statutory information sharing duty under section 16LA of the Children Act 2004 comes into force on 30 September 2026. The Lodge will follow the current statutory information sharing guidance and any duty that applies directly to our role or through the arrangements under which services are commissioned.

Where guidance overlaps or circumstances are uncertain, The Lodge will use the approach that best protects the child and will seek specialist or local safeguarding advice where needed.

Status of The Lodge

The Lodge is a small commissioned education support provision operated by PJ Creative Learning Ltd. It provides part time one to one support from a dedicated site. It is not a registered school. Our safeguarding arrangements are designed for the way we actually work, while meeting robust standards that referring settings can rely upon.

3. Definitions

A child is anyone who has not yet reached their eighteenth birthday. Where a learner is 18 or over, appropriate adult safeguarding arrangements will apply while relevant education, care and information sharing responsibilities continue.

Safeguarding and promoting the welfare of children includes providing help and support as soon as problems emerge, protecting children from maltreatment inside and outside the home including online, preventing impairment of physical and mental health or development, ensuring safe and effective care and taking action to enable the best outcomes.

Child protection is part of safeguarding and refers to action taken where a child is suffering, or is likely to suffer, significant harm.

Abuse is a form of maltreatment. It may involve causing harm or failing to act to prevent harm. Abuse may be physical, emotional or sexual, or may take the form of neglect or exploitation. It may happen in a family, community, intimate relationship, institution, online environment or between children.

Working Together 2026 distinguishes universal services and community based early help from targeted Family Help. The Lodge will work with referring settings and other professionals where a learner or family may benefit from coordinated support before concerns escalate.

A safeguarding concern is any information, observation, disclosure, change or pattern that creates worry about a learner's safety, welfare, care, behaviour, relationships, health, attendance or circumstances.

Contextual safeguarding recognises that children may face harm outside the home, including through peer groups, public spaces, transport, intimate relationships, the community and online environments.

4. Equality Statement

The Lodge is committed to equality, dignity, inclusion and respect in every part of its work, including safeguarding. Every child has an equal right to protection from harm.

We recognise that some children face additional barriers to recognising harm, telling someone what is happening, being believed or getting the right help. This may include learners with SEND, communication differences, care experience, mental health needs, family stress, disrupted education, discrimination, social isolation or previous trauma.

Adults at The Lodge must remain alert to the possibility that bias, stereotyping or assumptions can cause safeguarding signs to be overlooked. An injury, change in behaviour, distress, absence or communication difficulty must never simply be attributed to a diagnosis, disability or life circumstance without appropriate consideration.

We do not tolerate racism, misogyny, homophobia, transphobia, ableism, faith based prejudice, sexual harassment or other discriminatory behaviour. Where discrimination affects a child's safety, wellbeing or willingness to seek help, it will be treated as a safeguarding concern as well as a behaviour or equality matter.

Communication will be adapted so that learners can understand, express their views and raise concerns. We will use reasonable adjustments, visual support, additional time, trusted adults and communication methods suited to the individual learner.

5. Roles and Responsibilities

5.1 All adults working at The Lodge

Safeguarding is everyone's responsibility. Every adult working or volunteering at The Lodge is expected to understand this policy, recognise possible signs of abuse, neglect, exploitation or wider safeguarding risk, and share concerns immediately with the Designated Safeguarding Lead.

Adults must listen carefully, respond calmly, take disclosures seriously and never promise secrecy. They should use open and non leading questions only where clarification is genuinely needed and must not investigate a concern themselves. The child's welfare, communication and lived experience must remain central to the response.

Adults are expected to model safe, respectful and professional behaviour, maintain clear boundaries, use technology safely and raise concerns about adult conduct even where the concern appears small. A calm and open culture is safer than one in which people are reluctant to speak.

5.2 Designated Safeguarding Lead

Paula Johnson is the Designated Safeguarding Lead and has lead responsibility for safeguarding and child protection at The Lodge during operational hours.

The Designated Safeguarding Lead receives concerns, assesses immediate risk, supports adults, makes or supports referrals, maintains secure records, shares information lawfully and appropriately, and liaises with the learner's main education setting, children's social care, police, the Local Authority Designated Officer and other professionals where required.

The Designated Safeguarding Lead will keep the learner's voice central to decision making and will consider communication needs, SEND, trauma, family circumstances, online experiences and the wider context of the child's life.

The Lodge does not currently have a Deputy Designated Safeguarding Lead. If Paula Johnson is unavailable and a child may need help or protection, adults must not wait. They must contact Coventry MASH, the Emergency Duty Team or the police as appropriate, and inform Paula Johnson as soon as it is safe to do so.

If the concern relates to Paula Johnson, the concern must not be reported to her first. The Local Authority Designated Officer route must be used and children's social care or police contacted where a child may be at risk.

5.3 PJ Creative Learning Ltd

PJ Creative Learning Ltd has overall operational responsibility for maintaining effective safeguarding arrangements, suitable recruitment and suitability checks, training, policy review and appropriate external oversight. Because the Designated Safeguarding Lead is also the setting lead, external advice or independent

professional challenge will be sought where a matter involves her conduct, creates a conflict of interest or would benefit from independent scrutiny.

5.4 Referring settings and commissioning bodies

Before support begins, The Lodge and the referring setting will agree the essential information needed for safe support, including safeguarding contacts, risk information, attendance reporting, arrival and departure arrangements and how concerns will be shared. The Lodge will communicate safeguarding information promptly, but this communication will never delay a direct referral to children's social care or the police where one is required.

6. Confidentiality

The Lodge recognises that timely, lawful and proportionate information sharing is essential to effective safeguarding. Safeguarding information is confidential, but it is not secret.

Adults must never promise a child that a disclosure will be kept private. They should explain gently that information may need to be shared with the Designated Safeguarding Lead or another safeguarding professional so that the child can be kept safe.

Information will be shared only with people who need it to protect or support the child and will be handled in a way that is necessary, proportionate, relevant, accurate, timely and secure.

Consent should normally be sought where this is appropriate and safe, but consent is not required where seeking it would increase risk, cause unreasonable delay, prejudice the prevention or detection of crime, or where another lawful safeguarding basis applies. The reason for sharing, or for deciding not to share, will be recorded.

Data protection law must not be treated as a barrier to safeguarding. Where there is doubt about whether information should be shared, the Designated Safeguarding Lead will consider the potential harm of not sharing as well as the need to protect privacy.

7. Recognising Abuse and Taking Action

Safeguarding concerns do not always arrive as a clear disclosure. A learner may communicate distress through words, behaviour, withdrawal, emotional dysregulation, artwork, changes in presentation, attendance, online activity or a change in the way they relate to trusted adults. Adults at The Lodge are expected to remain curious and attentive to these changes.

7.1 If an adult has a concern

The adult should act promptly, make sure the learner is safe, listen without judgement and report the concern to the Designated Safeguarding Lead without delay. A clear factual record should be made as soon as possible and on the same day. The adult should record what was seen or heard, the learner's own words where possible, the date and time, action taken and who was informed.

7.2 If a learner makes a disclosure

The learner should be reassured that they were right to speak. The adult should stay calm, allow the learner to talk at their own pace and avoid asking the learner to repeat the account unnecessarily. The adult must not promise confidentiality, investigate the allegation, confront another person or ask leading questions. Immediate medical or emergency help must be arranged where needed.

7.3 Referral and escalation

The Designated Safeguarding Lead will decide what action is required in light of the information available, the learner's immediate safety and local thresholds. This may include speaking with the learner, consulting the referring setting, contacting Coventry MASH, seeking police advice, using the Local Authority Designated Officer process, or coordinating Family Help or other support. Where a child is in immediate danger, 999 must be used. Any adult may contact children's social care or police directly if they believe this is necessary to protect a child.

7.4 Family Help and early support

Not every concern requires a child protection referral, but concerns should never be allowed to drift. Where a learner or family would benefit from earlier coordinated support, The Lodge will work with the referring setting and relevant professionals to support access to community based early help or Family Help. The child's voice, family context, strengths and protective relationships should remain part of that planning.

7.5 Specific reporting duties

Where the law places a specific reporting or referral duty on a professional or organisation, that duty will be followed. This includes relevant duties connected with female genital mutilation, Prevent, concerns about adults working with children, and referrals to the Disclosure and Barring Service where the legal criteria are met. Advice will be sought where the application of a duty is uncertain.

8. Online Safety and the Use of Technology

Online safety is part of safeguarding, not a separate issue. The Lodge recognises that harm may move between online and offline spaces and that children can experience grooming, bullying, sexual harassment, exploitation, coercion, fraud, harmful content, location based risk and pressure to create or share images through digital technology.

Adults remain alert to self generated intimate images and videos, including material created or altered using artificial intelligence such as deepfakes. A child may be harmed even where an image is not a genuine photograph. Concerns involving intimate imagery, sexualised content, threats, coercion or image based abuse will be treated as safeguarding concerns and handled sensitively.

The Lodge also recognises that generative artificial intelligence can create new risks around inaccurate information, privacy, harmful content, manipulated images and the sharing of personal information. Any use of artificial intelligence in our work must be carefully considered, age appropriate and consistent with safeguarding and data protection expectations. Personal or safeguarding information about a learner must not be entered into an artificial intelligence service unless its use has been specifically approved and there is a lawful and secure basis for doing so.

Learners will be supported in ways that suit their communication and understanding. This may include discussion about privacy, consent, relationships, scams, money, location sharing, images, deepfakes, trusted adults and how to seek help.

Adults must follow The Lodge Online Safety Policy and Staff Code of Conduct when using phones, messaging, photographs, online platforms or other technology in connection with learners. Concerns about inappropriate digital contact by an adult must be reported immediately.

Online safety practice will be reviewed as technology and emerging risks change.

9. Notifying Parents or Carers

The Lodge works in partnership with parents and carers wherever it is safe and appropriate to do so. Open communication with families is often central to effective safeguarding and early support.

In most circumstances, a parent or carer will be informed at the earliest appropriate stage when a safeguarding concern has been identified. Communication will be calm, sensitive and focused on the child's welfare rather than blame.

There are situations in which informing a parent or carer could increase risk, compromise an investigation or place pressure on the child. This may arise in concerns involving sexual abuse within the family, forced marriage, female genital mutilation, honour based abuse or another circumstance in which a professional safeguarding agency advises against contact. In these situations, the Designated Safeguarding Lead will seek appropriate advice and record the reason for the decision.

Where safeguarding information is relevant to the learner's main education setting or another professional involved in the child's care, it will be shared promptly and lawfully. Parental consent is not required where safeguarding information needs to be shared to protect a child.

10. Record Keeping and Information Sharing

Clear, accurate and timely recording is a core part of safeguarding practice at The Lodge. Safeguarding concerns, disclosures, decisions and actions must be documented so that the child's experience is not lost and professionals can understand what has happened over time.

Records should distinguish what was observed, what the learner said, what another person reported and what is professional judgement. They should include the date and time, action taken, advice sought, decisions made, the reason for those decisions and the outcome where known.

The Designated Safeguarding Lead is responsible for maintaining safeguarding records securely and separately from routine educational records where appropriate. Chronologies will be used where this helps to identify patterns or repeated concerns.

Information may be shared with the learner's main education setting, commissioning body and statutory safeguarding agencies where this is necessary to protect or support the child. The reason for sharing, and any decision not to share, will be recorded.

If a learner moves to another setting or the commissioned support ends, relevant safeguarding information held by The Lodge will be shared securely with the appropriate responsible setting or professional where this is necessary for continuity of protection. Receipt will be confirmed where appropriate.

The Lodge follows current statutory information sharing guidance. From 30 September 2026 the section 16LA information sharing duty must also be considered where it applies to the organisation or to the commissioned safeguarding arrangements.

11. Learners with SEND, Disabilities or Health Needs

At The Lodge, we are fully committed to safeguarding learners with Special Educational Needs and Disabilities, long term health conditions, mental health needs and communication differences. We recognise that some children with additional needs can face increased vulnerability and additional barriers to recognising harm, explaining what has happened or receiving the right response.

Children with SEND may be more vulnerable because of increased dependence on adults, social isolation, difficulty understanding boundaries or consent, communication differences, exposure to multiple professionals, or behaviour that may mask distress or trauma. They may also find it harder to judge whether online information, images or contact are genuine or safe.

Adults must not assume that an injury, change in behaviour, communication difficulty, distress or absence is explained by a diagnosis, disability or health condition. Behaviour is often communication and safeguarding practice must remain curious, sensitive and individualised.

At The Lodge, safeguarding is adapted to the learner rather than expecting the learner to adapt to a safeguarding system. Learners may communicate through speech, sign, visual support, drawing, assistive technology, gesture, facial expression, creative work or changes in behaviour. Adults must know the learner well enough to notice what may be different for them.

We work closely with families, referring settings and other professionals to understand each learner's risks, strengths and communication. Individual risk assessments, support plans and safeguarding records will reflect SEND related considerations where relevant.

Every learner is entitled to the same protection, dignity and opportunity to be heard. Reasonable adjustments will be used to remove barriers to safeguarding support.

12. Looked After and Previously Looked After Children

The Lodge recognises that looked after and previously looked after children, and children living in kinship care, special guardianship, adoption or other care arrangements, may have experienced trauma, neglect, loss, exploitation, placement changes or disruption to trusted relationships.

These experiences can affect emotional regulation, communication, attachment and trust. Safeguarding practice should therefore be stable, sensitive and informed by the individual child rather than assumptions about care status.

Where a learner is looked after or has relevant care arrangements, The Lodge will make sure that important information about legal status, parental responsibility and professional contacts is understood. We will work with the learner's main education setting, social worker, Virtual School where applicable, carers and other relevant professionals.

Adults will remain alert to changes in mood, behaviour, presentation, relationships or attendance that could indicate distress or emerging risk. Concerns will be responded to promptly and the learner will be supported through consistent relationships with trusted adults.

13. Safer Recruitment and Staff Conduct

The Lodge is committed to creating a safe environment through careful recruitment, appropriate suitability checks and clear expectations of professional conduct. Although The Lodge is not a registered school, we use

the safer recruitment principles in Keeping Children Safe in Education 2026 as a benchmark for our own practice.

Before an adult is engaged in work with learners, checks appropriate to the role will be completed and recorded. These may include identity, right to work, enhanced Disclosure and Barring Service checks and children's barred list information where the role involves regulated activity, references, qualification checks where relevant, employment history, overseas checks where appropriate and other checks required by the role.

Recruitment evidence is recorded on the Single Central Record or the appropriate staff record. A person who is barred from regulated activity with children will not be permitted to undertake regulated activity.

Adults supplied by another organisation must meet safeguarding standards appropriate to their role. The Lodge will obtain suitable assurance of checks and current safeguarding training and will still provide site specific induction, reporting routes and expectations for conduct.

All adults must maintain professional boundaries and behave in a way that is safe, respectful and open to scrutiny. Low level concerns, blurred boundaries, inappropriate language, misuse of technology or behaviour that causes unease should be shared rather than dismissed.

Where an allegation or concern about an adult meets or may meet the Local Authority Designated Officer criteria, the Coventry process will be followed. If the concern is about the Designated Safeguarding Lead, the matter will be referred externally without reporting it to her first.

14. LGBTQ+ and Gender Questioning Learners

The Lodge is committed to providing a safe and respectful environment for learners who are lesbian, gay, bisexual, transgender, questioning or exploring their identity. No child should experience bullying, humiliation, harassment or reduced protection because of their sexual orientation, gender identity or the way others perceive them.

We recognise that some learners may face additional vulnerability through discrimination, family conflict, social isolation, online abuse or pressure from peers. Adults will listen without judgement and respond to the safeguarding concern that is actually present rather than making assumptions about identity.

Where a learner is questioning gender, staff will keep safeguarding, dignity, privacy and the individual child's circumstances central to decision making. Information will be shared only where there is a safeguarding, welfare or other lawful reason to do so, and specialist advice will be sought where needed.

15. Whistleblowing and Raising Concerns

Every adult has a responsibility to speak up where safeguarding practice, conduct or decision making causes concern. The Lodge wants adults to feel able to raise concerns early, including concerns that feel uncomfortable or difficult to define.

Concerns about practice should normally be raised with the Designated Safeguarding Lead. Where the concern relates to Paula Johnson, involves a conflict of interest or cannot safely be handled internally, the Local Authority Designated Officer, children's social care, police or another appropriate external body should be contacted.

An adult who feels unable to raise a safeguarding concern internally can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285. Raising a concern in good faith will not result in negative treatment.

Where an adult believes a child's immediate safety is at risk, external action must not wait for an internal process.

16. Complaints and Concerns about Safeguarding

A complaint may reveal a safeguarding concern even where the person raising it does not use safeguarding language. A concern about a child's safety, treatment, supervision, boundaries, discrimination, adult behaviour or a failure to act must first be considered through a safeguarding lens.

The Complaints Policy does not replace child protection, police or Local Authority Designated Officer procedures. A safeguarding referral must never be delayed while a complaint is investigated.

Learners, parents, carers, referring settings and professionals may raise safeguarding concerns directly with the Designated Safeguarding Lead. They will be listened to respectfully and the concern will be recorded, considered and acted upon proportionately.

Where a person believes that a safeguarding concern has not been handled appropriately, they may raise the matter with the learner's main education setting, Coventry MASH, the Local Authority Designated Officer, the NSPCC Whistleblowing Advice Line or another relevant statutory body. The route chosen should reflect the nature and urgency of the concern.

17. Safeguarding Training

Safeguarding training is essential to maintaining a safe environment at The Lodge. Adults who regularly work with learners must receive safeguarding and child protection training appropriate to their responsibilities before direct work begins, together with Prevent awareness, online safety information, the Staff Code of Conduct and the local reporting route.

As an adopted standard of good practice, regular adults working with learners at The Lodge will read and confirm that they understand Part One of Keeping Children Safe in Education 2026 in full. The overview published by the Department for Education may support understanding, but it does not replace Part One.

Training will cover recognition of abuse, neglect and exploitation, response to disclosures, child on child abuse, sexual harassment and violence, online and artificial intelligence related harm, SEND and SEMH vulnerabilities, domestic abuse, radicalisation, concerns about adult conduct and local referral arrangements.

Formal safeguarding training will be refreshed at least every two years, with updates provided between formal training and whenever guidance, local risk or practice changes. Understanding will be reinforced through induction, supervision, professional discussion and review of practice.

The Designated Safeguarding Lead will maintain role specific safeguarding training and refresh formal training at least every two years, with regular updates in between. Ongoing learning will include local thresholds, Family Help, information sharing, allegations against adults, safer recruitment, online safety, SEND vulnerabilities, exploitation, serious violence, harmful sexual behaviour, child voice and multi agency working.

18. Monitoring Arrangements

Safeguarding is not static. The Designated Safeguarding Lead will monitor how this policy works in practice through safeguarding records, referrals, attendance concerns, low level concerns, complaints, training records, recruitment checks, online safety reviews, supervision and feedback from learners, families and referring settings.

Patterns will be considered carefully, including repeated concerns, disproportionality, discrimination, emerging online risk and barriers that may affect children with SEND or other vulnerabilities.

This policy will be reviewed at least annually and sooner after a serious incident, a material change in law or guidance, a change in local safeguarding procedure, a significant operational change or evidence that practice is not working as intended.

Because the Designated Safeguarding Lead is also the setting lead and policy owner, external advice or independent professional challenge will be sought where a review involves her conduct, a significant safeguarding decision or a possible conflict of interest.

19. Compliance with the Law

PJ Creative Learning Ltd will apply the legal and safeguarding framework relevant to its status and activities. It will not describe a school specific statutory duty as applying directly where it does not, but it will adopt robust education safeguarding standards where they strengthen protection and partnership working.

The Lodge will cooperate with statutory enquiries and lawful requests for information, preserve relevant records and follow directions from children's social care, police and other competent authorities where appropriate. Any legal duty to refer to the Local Authority Designated Officer, Disclosure and Barring Service or another body will be considered and followed where the criteria are met.

Nothing in this policy prevents an adult from contacting children's social care, police or another statutory agency directly where that is necessary to protect a child.

The Lodge provides commissioned support on a part time one to one basis. Learners remain on roll at their main education setting or have education arranged by the local authority. The Lodge maintains accurate

attendance and commissioning records and keeps its operating model under review so that its legal status remains clear and transparent.

20. Links with Other Policies

This policy should be read alongside The Lodge Behaviour and Risk Response Policy, Staff Code of Conduct, Safer Recruitment arrangements and Single Central Record, Online Safety Policy, Visitors and Access Policy, Attendance and Engagement Policy, Unplanned Movement Policy, Lone Working Policy, SEND and Inclusion Policy, Health and Safety Policy, First Aid and Medical Emergencies Policy, Fire Safety Policy, Complaints Policy, Whistleblowing Policy, Data Protection and GDPR Policy and Privacy Notice. These documents support the safeguarding arrangements described here and should be applied consistently rather than in isolation.

Appendix 1. Types of Abuse

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It can also include fabricated or induced illness.

Emotional abuse

Emotional abuse is persistent emotional maltreatment that has a severe and adverse effect on a child's emotional development. It may include making a child feel worthless, frightening them, silencing them, exposing them to domestic abuse or placing expectations on them that are inappropriate for their age or development.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities. It can include physical contact and non contact activity, including grooming, sexualised communication, viewing or creating sexual images, exploitation and abuse involving digital technology.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs in a way that is likely to result in serious impairment of health or development. It may involve inadequate food, shelter, clothing, supervision, medical care, emotional responsiveness or protection from harm.

Exploitation

Children may also experience criminal exploitation, sexual exploitation, trafficking, modern slavery, financial exploitation or other forms of coercion and control. Exploitation can occur alongside any of the main categories of abuse and may be facilitated online or through peer and community networks.

Appendix 2. Safer Recruitment and DBS Checks

Safer recruitment begins before an appointment is made. Role descriptions, recruitment decisions, references and checks should make clear that safeguarding is part of every role that involves learners.

The level of Disclosure and Barring Service check and any barred list information will reflect the duties of the role and whether regulated activity is involved. Identity, right to work, references, qualifications where relevant, work history and any necessary overseas checks will be considered and recorded. Where a role or circumstance requires an additional check, this will be completed before unsupervised work with learners begins.

The Lodge maintains a Single Central Record and supporting recruitment evidence. The record is used as an oversight tool and does not replace the underlying evidence or the professional judgement required in safer recruitment.

Where a person is supplied by another organisation, The Lodge will obtain suitable written assurance that required checks have been completed. Site induction, conduct expectations and safeguarding reporting arrangements still apply while the person is at The Lodge.

Appendix 3. Allegations Against Adults and Low Level Concerns

Any concern about an adult working with children must be taken seriously. A concern may involve behaviour that has harmed a child, may constitute a criminal offence, may indicate a risk of harm, may suggest the adult is unsuitable to work with children, or may fall below those thresholds but still cause unease.

Low level concerns are not ignored because they appear minor. They are recorded and reviewed so that patterns, boundary issues or emerging risks can be identified. The aim is to maintain a culture in which safe professional behaviour is clear and concerns are addressed early.

Where the Local Authority Designated Officer criteria are met or may be met, the Coventry online notification route will be used and advice sought as required. If a child may also be at risk of harm, children's social care or police must be contacted without delay.

If the concern is about Paula Johnson, the matter must be handled externally and must not be reported to her first. Records relating to allegations and low level concerns will be stored securely with access limited to those who need the information.

Appendix 4. Specific Safeguarding Issues

Child on child abuse

Children can abuse other children in person or online. This may include bullying, sexual harassment, sexual violence, coercion, harmful sexual behaviour, image based abuse, physical harm, initiation type behaviour or exploitation. It must never be dismissed as banter, part of growing up or something the child should manage alone.

Sexual violence and sexual harassment

Reports of sexual violence or harassment require a calm, child centred response. The wishes and feelings of the child should be considered alongside safety, risk to others, legal duties and advice from statutory agencies. Both the child who reports harm and any other children affected may need support.

Domestic abuse

A child can be harmed by seeing, hearing or experiencing the effects of domestic abuse even where they are not the direct target. Changes in behaviour, emotional regulation, concentration, attendance or relationships may reflect what is happening at home.

Child criminal exploitation and county lines

Children may be groomed or coerced into criminal activity, transport of drugs or money, debt, violence or other exploitation. Missing episodes, unexplained money or possessions, new peer groups, fear, injuries or changes in behaviour may be indicators.

Child sexual exploitation

Child sexual exploitation is a form of sexual abuse in which a child is manipulated, coerced or deceived into sexual activity. Apparent agreement does not remove safeguarding concerns where there is exploitation, imbalance of power, grooming or exchange.

Serious violence

Adults should be alert to indicators of serious violence, including unexplained injuries, fear, changes in friendships, association with older peers, weapons, repeated missing episodes, sudden changes in behaviour or involvement in criminal exploitation.

Female genital mutilation

Female genital mutilation is abuse and is illegal. Concerns must be reported through safeguarding procedures without delay. Where a regulated professional has a personal statutory reporting duty, that duty must also be followed.

Forced marriage and honour based abuse

Forced marriage and so called honour based abuse can place a child at significant risk. Families must not be contacted about these concerns without careful safeguarding consideration and, where appropriate, specialist advice.

Prevent and radicalisation

The Lodge remains alert to concerns that a child may be vulnerable to radicalisation or extremist influence. Concerns will be shared through safeguarding procedures and advice sought through the appropriate Prevent route where needed.

Attendance and unexplained absence

Because learners attend The Lodge for agreed commissioned sessions, unexpected absence can be a safeguarding signal. Attendance is recorded and concerns are shared promptly with the learner's main

education setting in accordance with agreed arrangements. Where immediate safety is in question, safeguarding action will not wait for routine attendance processes.

Mental health and self harm

Mental health difficulties and self harm can be indicators of safeguarding need as well as health concerns. Adults should respond calmly, take expressions of hopelessness or harm seriously and seek urgent help where there is immediate risk.

Online harm, artificial intelligence and deepfakes

Online harm can include grooming, sexual exploitation, bullying, coercion, scams, violent or sexual content, location based risk and pressure to create or share intimate material. Artificial intelligence can also be used to create convincing false images, videos or messages. The fact that content is artificially generated does not reduce the safeguarding impact on a child.

Contextual safeguarding

Risk may arise in places and relationships outside the family, including transport, local spaces, peer groups, intimate relationships and online communities. Safeguarding assessment should consider where the harm is happening and who may be influencing the child.

Children missing education or support

Repeated absence, sudden disengagement or loss of contact may indicate wider vulnerability. The Lodge will share concerns with the learner's main education setting and will take direct safeguarding action where there is reason to believe a child is unsafe.

Appendix 5. Lone Working and Safeguarding

The Lodge does not operate lone working with learners. At least two adults are on site whenever a learner is present. This arrangement supports emergency response, professional accountability and the safety of both learners and adults.

The second adult does not need to remain in the same room as the learner and tutor throughout the session, but must remain on site, be contactable and be able to respond promptly if support is needed. The needs and risk assessment of the individual learner may require closer proximity or a different arrangement.

One to one work should take place in spaces that support dignity and calm while remaining compatible with safe professional practice. Adults should avoid unnecessary isolation, maintain appropriate boundaries and follow arrival, departure, access and visitor procedures.

If staffing falls below the agreed minimum while a learner is present, the situation must be made safe without delay. Depending on the circumstances this may require bringing another authorised adult on site, pausing an activity, contacting the family or referring setting, or ending the session safely.

Guidance Used for the September 2026 Review

Keeping Children Safe in Education 2026. Department for Education. In force from 1 September 2026. Available through GOV.UK.

Working Together to Safeguard Children 2026. Department for Education. Published March 2026. Available through GOV.UK.

Information Sharing to Safeguard Children and Young People. Department for Education. Updated 10 September 2026. The section 16LA information sharing duty comes into force on 30 September 2026. Available through GOV.UK.

Coventry City Council safeguarding referral and Local Authority Designated Officer information. Contact routes checked during the September 2026 review.

NSPCC Learning guidance on writing safeguarding policies and procedures. Updated 1 September 2026. This guidance supports policies that are clear, tailored to the organisation and accessible to children, families and adults working with them.

Childline contact information checked during the September 2026 review.

Policy reviewed by Paula Johnson, Director and Designated Safeguarding Lead, PJ Creative Learning Ltd.