



EDClass Child Protection Policy

POL080

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Approved by Sam Warnes

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Policy Statement and Principles

EDClass provides an accredited, fully supervised online alternative provision designed to break barriers to learning for children and young people. Every child, regardless of age, special educational needs or disabilities (SEND), gender, race, religious belief, sexual orientation, care status, or family background, has an equal right to protection from all forms of violence, abuse, neglect, and exploitation.

Operating exclusively within an online learning environment presents distinct safeguarding dynamics. Physical distance from learners does not reduce our duty of care; rather, it demands enhanced digital vigilance, rigorous session monitoring, rapid multi-agency communication, and proactive risk detection.

The best interests of the child are paramount in every decision made by EDClass. This policy establishes clear operational protocols to ensure that child protection concerns are identified promptly, managed decisively, and communicated without delay to commissioning schools, local authorities, and statutory child protection agencies.

Statutory, Legal, and Regulatory Framework

This policy complies with all relevant national legislation and statutory guidance applicable to alternative provision providers and accredited online education institutions:

- ✓ **Keeping Children Safe in Education (KCSIE 2026):** Fulfilling all requirements regarding safeguarding governance, filtering and monitoring, safer recruitment, child-on-child abuse, and staff conduct.
- ✓ **Working Together to Safeguard Children (statutory guidance):** Operating as an active partner within multi-agency safeguarding arrangements.
- ✓ **The Children Act 1989 and 2004:** Upholding statutory responsibilities to promote the welfare of children and safeguard them from significant harm.
- ✓ **The Education Act 2002 (Section 175):** Ensuring functions are carried out with a view to safeguarding and promoting the welfare of children.
- ✓ **The Equality Act 2010:** Protecting children with protected characteristics, preventing discriminatory practices, and making reasonable adjustments for disabled pupils.
- ✓ **DfE Online Education Accreditation Scheme (OEAS):** Adhering to the accreditation standards for online education providers
- ✓ **UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018:** Sharing critical welfare information lawfully and proportionally under statutory safeguarding exemptions.

Governance Structure and Institutional Hierarchy

This framework establishes **safeguarding as the non-negotiable operational priority** across EDClass, ensuring child safety legally and procedurally overrides all curriculum, SEND adjustments, or administrative goals:

- ✓ **Safeguarding Primacy & Veto Power:** Kim (Head of Safeguarding / Lead DSL) holds operational seniority over both the Head of SEND and Curriculum Leads. If an educational modification, EHCP provision, or timetable accommodation creates a safety risk, safeguarding's determination is final.
- ✓ **Dual Operational Oversight:**
 - ✓ **Safeguarding Branch (Deputy DSLs/Officers):** Conducts real-time intake screening, live session auditing, and direct liaison with external bodies (Multi-Agency Safeguarding Hubs / commissioning school DSLs).
 - ✓ **SEND Branch (Head of SEND):** Oversees accessibility, EHCP compliance, and curriculum scaffolding, but must formulate all learning plans within the boundaries set by safeguarding risk assessments.
- ✓ **Frontline Teacher Escalation:** UK-qualified teachers deliver instruction while serving as the primary detection point, responsible for spotting behavioural distress, logging flags immediately, and enforcing digital boundaries.
- ✓ **Statutory Compliance:** Structures governance to meet statutory duties under Keeping Children Safe in Education (KCSIE), the Online Education Accreditation Scheme (OEAS), and local multi-agency standards.

Online Vulnerabilities and Contextual Safeguarding

EDClass operates as an alternative provision provider supporting vulnerable cohorts, including learners accessing education off-site, within isolation or internal alternative provision (IAP), medical pathways, or via rotated seat allocations on part-time timetables. Staff receive comprehensive training to recognise online and contextual risks:

Category of Risk	Risk Indicators in a Remote Learning Environment	Platform Safeguarding Action
Child Sexual Exploitation (CSE) and Abuse (CSA)	Disclosures in private chat, webcam anxiety, sudden withdrawal, age-inappropriate sexual knowledge, references to gifts/money received online.	Immediate referral to Lead DSL; video capture isolation; direct urgent contact with commissioning school DSL.
Child Criminal Exploitation (CCE) and County Lines	Unexplained access to expensive technology/clothing, gang references, missing sessions during specific times, anxiety around geographic location.	Intelligence sharing with home school DSL; formal documentation of operational and environmental cues.
Youth-Produced Sexual Imagery ("Sexting")	Mentions of image-sharing, digital coercion, threats to circulate private photos, panic during chat sessions.	Implementation of UKCIS and KCSIE 2026 protocols; immediate reassurance without viewing or circulating illicit material; escalation to school DSL.

Category of Risk	Risk Indicators in a Remote Learning Environment	Platform Safeguarding Action
Online Harassment and Child-on-Child Abuse	Coercive messaging via shared digital spaces, exclusion of peers, cyberbullying, malicious comments regarding protected characteristics.	Instant isolation of messaging threads, behaviour repair intervention, preservation of chat logs, escalation to Lead DSL.
Radicalisation and Extremism (Prevent)	Sharing extremist views, expressing ideological intolerance, sudden alienation, fixation on extremist symbols/propaganda.	Formal logging under the Prevent Duty; rapid case evaluation by the Head of Safeguarding and external referral where warranted.
Acute Mental Health Crises and Self-Harm	Explicit self-harm or suicidal ideation in chat, visible injuries on webcam, expressions of profound hopelessness.	Immediate deployment of emergency pastoral escalation; real-time contact with home school DSL and emergency services if there is immediate risk to life.
Domestic Abuse and Neglect	Background arguments audible over audio feeds, visible domestic distress, physical neglect indicators, fear of being overheard at home.	Accurate verbatim recording; assessment under domestic abuse notification standards; liaison with local children's services.

Digital Architecture, Monitoring, and Filtering

This digital architecture provides a multi-layered protective environment designed to satisfy statutory Department for Education (DfE) and **KCSIE** filtering and monitoring mandates:

- ✓ **Real-Time Keyword Filtering:** Continuously scans text entries, submitted coursework, and live chat logs against dynamic threat databases (such as signs of abuse, distress, or self-harm) to trigger instant alerts the moment a concern is detected.
- ✓ **Automated Session Capture:** Creates an immutable, tamper-evident record of all platform activity—including student inputs and live audio/video feeds—providing clear audit trails for incident investigations and compliance verification.
- ✓ **Controlled Audio/Video & Boundary Safeguards:** Enforces strict communication perimeters through managed, staff-present environments and one-to-one boundary controls, completely eliminating unmoderated pupil-to-pupil channels to prevent peer-on-peer abuse.



Digital Safeguarding Protocols

- ✓ **Real-Time Automated Keyword Filtering:** All text inputs across chat, written assignments, and search functions are continuously scanned by automated algorithmic filtering. High-risk terms (relating to self-harm, sexual violence, abuse, weapons, or radicalisation) instantly generate priority alerts sent directly to the Safeguarding Team.
- ✓ **Session Recording and Auditing:** Live video, interactive whiteboard activity, and chat dialogues between teachers and learners are securely recorded, timestamped, and archived. Recordings are held within secure UK-based cloud infrastructure to enable retrospective safeguarding audits, investigations, and inspection reviews.
- ✓ **Controlled Audio and Webcam Use:**
 - ✓ One-to-one live interactions are strictly contained within the secure EDClass application ecosystem. No private or third-party meeting tools (e.g., personal Zoom, Teams, WhatsApp, social channels) are permitted.
 - ✓ Teachers must broadcast from neutral, professional environments against approved EDClass backgrounds.
 - ✓ Where learner webcams are active, staff ensure environments are appropriate (e.g., communal living spaces rather than private bedrooms wherever possible). Any inappropriate background activity triggers immediate video termination and safeguarding logging.
- ✓ **No Unmoderated Peer Communication:** Learners cannot initiate private, unmoderated peer-to-peer chats, video calls, or file transfers, preventing online harassment and child-on-child exploitation within the platform.

Automated Intake, Dynamic Allocation, and Safeguarding Data Transfer

To deliver fast intervention without creating administrative delays, EDClass utilises an automated onboarding workflow that embeds safeguarding data from the point of commission:

Intake and Seat Management

- ✓ **Automated Data Integration:** When a commissioning school purchases or rotates an EDClass seat (for inclusion, isolation, IAP, medical leave, or part-time timetabling), pupil profile data transfers securely into the platform without waiting for manual onboarding meetings.
- ✓ **Mandatory Safeguarding Fields:** The automated setup requires commissioning schools to confirm:
 - ✓ Child Protection (CP) or Child in Need (CIN) plan status.
 - ✓ Looked After Child (LAC) / Previously Looked After status.
 - ✓ Current multi-agency involvement (e.g., Early Help, Youth Justice, CAMHS).
 - ✓ Named home school DSL and Main Point of Contact (MPOC) emergency telephone numbers.
- ✓ **Continuous Review Focus:** Eliminating manual onboarding meetings allows operational teams to focus on continuous learner reviews, monitoring progress, attendance, and welfare fluctuations in partnership with the home school.



Incident Identification, Disclosure, and Escalation Procedures

Frontline staff must act immediately upon identifying a welfare concern, receiving a disclosure, or receiving an automated platform alert. Staff must never investigate, promise confidentiality, or delay reporting.

This procedure establishes a strict safeguarding escalation pathway, ensuring frontline staff act solely as reporters rather than investigators, while routing concerns through immediate internal triage and external intervention.

- ✓ **Core Operating Principle:** Frontline staff never investigate, interrogate, promise confidentiality, or delay. Their role is immediate containment, calm reassurance, and objective evidence gathering.
- ✓ **Detection & Evidence Preservation (Steps 1–2):** Incidents trigger via automated keyword filters, direct student disclosures (chat/voice), or observed behavioural red flags. Staff record verbatim statements immediately and capture tamper-evident digital proof (timestamps, chat records, screen captures).
- ✓ **Internal Triage (Step 3):** The safeguarding team (led by Kim, Head of Safeguarding, and Deputy DSLs) reviews the evidence against the student's case history to determine severity.
- ✓ **Dual Escalation Pathways:**
 - ✓ **Critical / Acute Harm (Immediate Risk to Life):** Bypasses standard administrative delays with simultaneous emergency escalation—dialling 999, an immediate phone call to the commissioning school's DSL, and a direct referral to the local authority Multi-Agency Safeguarding Hub (MASH) or Social Care.
 - ✓ **Standard Welfare Concern (Emerging Needs):** Formally communicated to the commissioning school's DSL within 4 operational hours, logged securely on systems, and scheduled for routine case reviews

Protocol for Staff Receiving Disclosures

- ✓ **Listen Actively and Reassure:** Accept what the learner says without displaying shock or judgment. State clearly that you take their concerns seriously.
- ✓ **Explain the Limits of Confidentiality:** Reassure the learner that they did the right thing by speaking up, but explain that you must pass this information to Kim and the safeguarding team to ensure they remain safe. Never promise secrecy.
- ✓ **Avoid Leading Questions:** Clarify details using open-ended prompts only. Do not cross-examine or lead the witness.
- ✓ **Log Promptly:** Submit a detailed, objective, verbatim report onto the platform's internal safeguarding logging system within 30 minutes of session completion, citing date, time, direct quotations, and relevant context.

Multi-Agency Working and Commissioning School Partnership

EDClass operates as an alternative provision provider; primary statutory responsibility for the child remains with the commissioning school and home local authority. Our procedures ensure seamless communication and escalation:

- ✓ **Dual-DSL Communication:** For all actionable child protection concerns, the EDClass Safeguarding Team issues an encrypted notification to the commissioning school's DSL. Written confirmation is required from the home school confirming receipt of the referral.
- ✓ **Emergency Override Protocol:** If a learner is in immediate physical danger, experiencing acute sexual violence, or expressing imminent suicidal intent, and the commissioning school DSL/MPOC cannot be reached immediately, the Head of Safeguarding will contact emergency services (999) and the learner's local authority Multi-Agency Safeguarding Hub (MASH) directly. The home school is notified in writing immediately thereafter.
- ✓ **Contribution to Statutory Reviews:** EDClass supplies objective attendance data, academic progress records, behavioural notes, and welfare observations for:
 - ✓ Team Around the Family (TAF) and Child in Need (CIN) reviews.
 - ✓ Child Protection Case Conferences (CPCC) and Core Group meetings.
 - ✓ Looked After Child (LAC) Personal Education Plan (PEP) reviews.
 - ✓ EHCP Annual Reviews (in direct coordination with the Head of SEND).

Safer Recruitment, Staff Suitability, and Allegations Management

In compliance with KCSIE 2026 and legislation EDClass applies thorough vetting and oversight to all employees, contractors, and agency personnel:

Vetting and Pre-Employment Checks

- ✓ **Enhanced DBS Checks:** Every member of staff undergoes an Enhanced Disclosure and Barring Service (DBS) check with Children's Barred List screening prior to commencing employment.
- ✓ **Online and Social Media Checks:** In line with KCSIE, shortlisted candidates are subject to structured online checks to identify any incidents or issues that might compromise their suitability to work with children.
- ✓ **Prohibition Orders and Professional Standing:** Teaching staff are verified against the Teaching Regulation Agency (TRA) Employer Access system to ensure they are not subject to prohibition, suspension, or interim restriction orders.
- ✓ **Employment History Verification:** Discrepancies, employment gaps, and written references are formally verified with former employers prior to appointment.

Staff Code of Conduct and Boundaries

- ✓ Staff are prohibited from communicating with enrolled learners outside of the monitored EDClass digital architecture.



- ✓ Staff must not share personal social media profiles, telephone numbers, or email addresses, nor accept contact requests from learners or former learners.
- ✓ Any accidental contact initiated by a learner through external digital channels must be reported immediately to the Head of Safeguarding.

Managing Allegations Against Staff

Any allegation indicating that an employee, tutor, or contractor has harmed a child, committed a criminal offense, or behaved in a way that suggests unsuitability to work with children will be managed with urgency:

- ✓ **Immediate Notification:** The concern must be reported to the **Head of Safeguarding**, within **1 hour**. (If the allegation concerns the Head of Safeguarding, it must be reported directly to the Chief Executive Officer / Board of Directors).
- ✓ **Local Authority Designated Officer (LADO) Referral:** The Lead DSL must contact the relevant local authority LADO within **24 hours** to seek independent statutory direction.
- ✓ **Internal Measures:** The member of staff will be suspended from platform access pending formal multi-agency investigation. Internal investigations are paused until statutory police and LADO enquiries conclude.

Data Protection, Confidentiality, and Information Sharing

Information sharing is essential to effective safeguarding. EDClass operates in strict compliance with the **Data Protection Act 2018** and **UK GDPR**, applying statutory safeguarding exemptions to protect children:

Lawful Basis for Processing Safeguarding Data

- ✓ **Article 6 (1)(c) and (e):** Processing is necessary for compliance with a legal obligation and for the performance of a task carried out in the public interest.
- ✓ **Article 9 (2)(g) and Data Protection Act 2018 Schedule 1 (Part 2, para 18):** Safeguarding of children and individuals at risk constitutes a condition of substantial public interest, allowing the processing of special category personal data without explicit consent where obtaining consent would compromise safety or result in unreasonable delay.

Practical Principles

- ✓ **Safety Overrides Privacy:** Data protection legislation is not a barrier to sharing information where there is cause to suspect a child is experiencing, or is at risk of, significant harm.
- ✓ **Secure Storage:** Safeguarding files, transcripts, and session video recordings are maintained separately from standard academic records, accessible solely by authorised safeguarding personnel.
- ✓ **Retention Policy:** Safeguarding records are retained in alignment with statutory guidance for the Independent Inquiry into Child Sexual Abuse (IICSA) and national



educational retention standards (typically until the learner's 25th birthday, or 26th birthday for care-experienced individuals).

Quality Assurance, Training, and Policy Review

To ensure safeguarding standards remain effective and fully compliant with evolving national expectations:

- ✓ **Staff Induction and Refresher Training:** All staff complete mandatory Level 2/3 Safeguarding training upon hire, followed by annual refreshers in KCSIE developments, online grooming, neurodiversity vulnerabilities, and trauma-informed support.
- ✓ **Leadership Continuous Professional Development:** The Head of Safeguarding and Deputy DSLs complete advanced multi-agency DSL training every two years, alongside continuous updates on digital safeguarding, OEAS compliance, and local authority protocols.
- ✓ **System Auditing:** Internal safeguarding audits take place every quarter. Senior Leadership and external consultants review sample logs, keyword alert response times, chat records, and multi-agency communication files to identify operational improvements.
- ✓ **Annual Policy Review:** This policy is formally reviewed, updated, and approved annually by the Senior Leadership Team, the Board of Directors, and the Head of Safeguarding.

Interlinked Statutory Policies

This Child Protection Policy operates in tandem with the following EDClass operational policies:

- ✓ Relationships and Sex Education (RSE) Policy
- ✓ Special Educational Needs and Disabilities (SEND) Policy
- ✓ Staff Code of Conduct and Professional Boundaries Policy
- ✓ Behaviour Policy
- ✓ E-Safety, Filtering and Monitoring Policy
- ✓ Data Protection Policy
- ✓ DPIA Policy
- ✓ Whistleblowing Policy
- ✓ Complaints Policy

