



Child Protection and Safeguarding Policy

Home-to-school and community transport services

VERSION 4	EFFECTIVE September 2026	NEXT REVIEW September 2027
----------------------------	---	---

24x7 Ltd

Controlled document - an electronic copy held on the company system is the authoritative version.

Document control

Policy title	Child Protection and Safeguarding Policy
Document owner	Group Safeguarding Lead
Approval authority	24x7 Ltd Board of Directors
Version	4
Effective date	September 2026
Next scheduled review	September 2027, or sooner following a significant incident, legal or guidance change, or material operational change
Supersedes	Version 3 and all earlier uncontrolled copies
Applies to	24x7 Ltd and any 24x7 Group company that adopts this policy; all directors, employees, workers, agency staff, contractors, subcontractors and volunteers
Document status	Controlled policy document. Printed or locally saved copies are uncontrolled.

Version history

Version	Issue date	Summary of change
3	July 2026	Full policy review and reissue. Expanded governance, child-centred reporting, direct referral and escalation, safer recruitment and regulated activity, allegations and low-level concerns, information sharing, transport-specific safeguards, training and assurance.
4	September 2026	Administrative update correcting the effective and next review dates and revising Section 1 (Purpose) to clarify how the policy relates to supporting policies, procedures and passenger-specific plans. No change to safeguarding duties or reporting requirements.

What every worker must do

- If a child is in immediate danger or needs urgent medical help, call 999 first and then notify the office and Group Safeguarding Lead without delay.
- For every other safeguarding concern, report it immediately through the office or directly to the Group Safeguarding Lead. Do not wait for proof or for the next shift.
- Listen, reassure, do not investigate, do not ask leading questions and never promise secrecy.
- Make a factual record as soon as possible, including the child's exact words and the action taken.
- If a concern is not acted on, escalate it. Any worker may make a direct referral to children's social care or the police where necessary to protect a child.

Contents

Section	Page
Document control	1
1. Purpose	3
2. Scope and definitions	3
3. Policy statement and principles	4
4. Legal and guidance framework	4
5. Governance and responsibilities	5
6. Recognising abuse, neglect, exploitation and vulnerability	6
7. Responding to a disclosure or concern	7
8. Reporting, referral and escalation	8
9. Concerns or allegations about people who work with children	9
10. Safer recruitment and ongoing suitability	10
11. Training, competence and supervision	10
12. Safe working in transport operations	11
13. Information sharing, recording and confidentiality	13
14. Complaints, whistleblowing and professional challenge	13
15. Monitoring, assurance and review	13
Appendix A - Immediate safeguarding response	15
Appendix B - Examples of indicators	16
Appendix C - Safeguarding contact routes	17

1. Purpose

This policy sets the minimum standards that 24x7 Ltd will apply to safeguard and promote the welfare of children and to respond to concerns that a child may be experiencing, or may be at risk of, abuse, neglect, exploitation or other harm.

It applies to all employees, workers, agency staff, contractors, subcontractors and volunteers undertaking work for or on behalf of 24x7 Ltd.

This policy is supported by the 24x7 Staff Handbook, Code of Conduct, safer recruitment procedures, incident-reporting arrangements, data protection and confidentiality requirements, complaints and whistleblowing procedures. Staff must also follow any passenger-specific risk assessment or transport plan relevant to their duties.

2. Scope and definitions

2.1 Who this policy applies to

This policy applies to everyone working for or on behalf of 24x7 Ltd, including directors, office-based staff, Drivers, Passenger Assistants, agency workers, contractors, subcontractors, consultants, trainees and volunteers. Contractual partners must meet standards that are at least equivalent to this policy.

2.2 Key definitions

Child	Any person who has not yet reached their 18th birthday.
Safeguarding and promoting welfare	Providing help and support as soon as problems emerge; protecting children from maltreatment inside or outside the home, including online; preventing impairment of health or development; ensuring safe and effective care; and taking action so children can achieve the best outcomes.
Child protection	The part of safeguarding concerned with action taken where a child is suffering, or is likely to suffer, significant harm.
Abuse, neglect and exploitation	Forms of maltreatment caused by an adult or another child, through an act or a failure to act. Harm may occur in person or online, within or outside the family, and may involve one or several forms at the same time.
Designated Safeguarding Lead (DSL)	For this policy, the Group Safeguarding Lead and any formally appointed deputy. Current names and contact details are maintained in the company safeguarding contact directory.
LADO	The Local Authority Designated Officer, or equivalent team, responsible for advice and oversight when an allegation concerns a person who works with children.

Geographical application

This policy is written for services delivered in England. Local multi-agency safeguarding procedures and commissioner requirements must also be followed. Where a service operates under a different legal jurisdiction, local law and procedure take precedence and this policy must be adapted accordingly.

3. Policy statement and principles

24x7 Ltd is committed to promoting children's rights, including their right to be protected from harm, abuse, neglect and exploitation, and to be listened to in decisions that directly affect them while using our services.

The following principles underpin every decision and action:

- Safeguarding is everyone's responsibility. No role, grade or contractual arrangement removes the duty to act.
- The child's welfare, safety and best interests are the primary consideration.
- A child-centred approach means listening to the child, taking their views seriously and making communication accessible to their age, understanding, language, disability and communication needs.
- Concerns must be acted on early. Staff do not need certainty or proof before reporting a concern.
- Children may not disclose harm directly. Staff must remain professionally curious and alert to words, behaviour, presentation, interactions, attendance and changes over time.
- Disabled children and children with special educational needs may face additional barriers to recognition and disclosure. Behaviour or communication differences must never be used to dismiss a concern.
- Safeguarding practice must be inclusive, anti-racist and anti-discriminatory. Prejudice, stereotyping or assumptions must be challenged.
- Information will be shared lawfully and proportionately where necessary to protect a child. Data protection is not a reason to delay or withhold a safeguarding referral.
- People who raise concerns in good faith will be supported and must not suffer retaliation or disadvantage.

3.1 Company commitments

- Maintain clear safeguarding governance, named leadership and accessible reporting routes.
- Recruit and deploy suitable people using lawful safer recruitment and vetting arrangements.
- Provide induction, role-specific training, refresher learning and supervision appropriate to safeguarding risk.
- Ensure all workers understand the standards in the Staff Handbook, Code of Conduct and this policy.
- Respond consistently and fairly to concerns about a child or the conduct of a person who works with children.
- Refer concerns promptly to statutory agencies and cooperate with multi-agency assessment, investigation and support.
- Enable children and families to express concerns and use accessible complaints arrangements without fear of disadvantage.
- Learn from incidents, complaints, allegations, audits and feedback, and keep policy and practice under review.

4. Legal and guidance framework

This policy is informed by the following legislation and guidance, together with amendments and successor guidance in force at the time of use:

- Children Act 1989 and Children Act 2004.
- Children and Social Work Act 2017.
- Safeguarding Vulnerable Groups Act 2006, Police Act 1997 and Protection of Freedoms Act 2012.
- Crime and Policing Act 2026, including the removal, from 1 September 2026, of the supervision exemption from regulated activity with children, and any statutory duty to report child sexual abuse that is in force at the time.
- Rehabilitation of Offenders Act 1974 and relevant Exceptions Orders.
- Domestic Abuse Act 2021.

- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance, where applicable.
- Equality Act 2010, Human Rights Act 1998, Data Protection Act 2018 and UK General Data Protection Regulation.
- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education 2026, as relevant good practice and as required through work with schools and colleges.
- Information sharing: advice for practitioners providing safeguarding services (2024).
- What to do if you are worried a child is being abused: advice for practitioners.
- Local multi-agency safeguarding arrangements, local threshold documents and the requirements of commissioning authorities.

Local procedures matter

24x7 operates across many local authority areas. The DSL and local managers must ensure current local children's social care, emergency duty team and LADO contact details and escalation procedures are available for each operational area.

5. Governance and responsibilities

Role	Core responsibilities	Minimum expectation
Board of Directors	Approve this policy, set safeguarding expectations, ensure adequate resources and receive assurance on compliance, themes, serious incidents and improvement actions.	At least annual oversight and prompt escalation of serious matters.
Group Safeguarding Lead / DSL	Provide strategic and operational leadership; advise staff; make or oversee referrals; liaise with children's social care, police, LADO, commissioners and schools; maintain records; monitor training; lead learning and review.	Must be contactable through published internal routes, with deputy cover.
Deputy DSLs / nominated safeguarding support	Act in the DSL's absence, support referrals and local liaison, and ensure actions are completed and recorded.	Must have appropriate training and authority.
Regional and local managers / office teams	Create a safe reporting culture, know local contact routes, pass concerns on immediately, preserve records, implement interim safety measures and ensure staff do not investigate or filter concerns.	Operational concerns must not be allowed to delay safeguarding action.
HR and Recruitment	Apply safer recruitment, vetting, ongoing suitability and fair employment procedures; work with the DSL on allegations, referrals and risk management.	Safeguarding and employment processes must be coordinated but remain distinct.
All workers	Complete training, follow safe working expectations, remain alert, report immediately, record accurately, maintain confidentiality and cooperate with safeguarding enquiries.	A worker may make a direct statutory referral if necessary to protect a child.
Contractors and subcontractors	Meet equivalent standards, provide evidence of vetting and training, report concerns immediately and cooperate with 24x7 and statutory agencies.	24x7 retains responsibility for checking contractual assurance and acting on concerns.

5.1 Named contacts

Names and direct contact details are held separately in the safeguarding contact directory so they can be updated without waiting for a policy reissue. Staff must know how to contact the office and the DSL before undertaking duties. Managers must keep local authority children's social care and LADO contacts current.

6. Recognising abuse, neglect, exploitation and vulnerability

Abuse and neglect can affect any child. It may be caused by adults or by other children, happen once or repeatedly, occur within or outside the home, and take place face-to-face or online. Staff are not expected to diagnose abuse; they are expected to notice, listen, record and report.

6.1 Main categories of abuse

Category	Description
Physical abuse	Deliberately causing physical harm, including hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing injury. It may also include fabricated or induced illness.
Emotional abuse	Persistent emotional maltreatment that seriously affects emotional development, including humiliation, threats, rejection, intimidation, coercion, exposure to domestic abuse, serious bullying and exploitation.
Sexual abuse	Forcing, persuading or enticing a child to take part in sexual activity, whether or not the child understands what is happening. It includes contact and non-contact abuse, grooming, sexual harassment, online abuse and the creation or sharing of sexual images.
Neglect	Persistent failure to meet a child's basic physical or psychological needs, likely to seriously impair health or development. It may involve inadequate food, clothing, shelter, supervision, medical care, protection or emotional responsiveness.

6.2 Other safeguarding risks

- Child-on-child abuse, including bullying, prejudice-based abuse, sexual harassment, sexual violence, coercive or controlling behaviour, initiation or hazing, and abuse within intimate relationships.
- Child sexual exploitation, child criminal exploitation, county lines, serious youth violence, gang involvement and group-based exploitation.
- Domestic abuse, including the impact on children who see, hear or experience its effects.
- Online abuse, grooming, cyberbullying, harmful content, coercion, exploitation and the sharing of nude or semi-nude images.
- Radicalisation and extremist influence.
- Female genital mutilation, forced marriage and honour- or faith-based abuse.
- Modern slavery, trafficking, missing episodes and exploitation outside the home.
- Racism, faith-targeted abuse, disablism, homophobia, transphobia and other prejudice-based harm.
- Mental health changes that may indicate or increase vulnerability to abuse, neglect or exploitation.
- Repeated or unexplained absence from transport, education, home or care, or a significant change in attendance or routine.

6.3 Indicators and professional curiosity

Possible indicators include unexplained injuries, hunger, poor hygiene, unsuitable clothing, fearfulness, withdrawal, aggression, sexualised behaviour, sudden mood or behaviour changes, reluctance to go home or travel with a particular person, concerning adult-child interactions, repeated missing journeys, unexplained possessions or money, or a disclosure made verbally, through behaviour, communication aids, writing or online content.

No single indicator proves abuse, and the absence of visible signs does not mean a child is safe. Staff must consider the child's circumstances and patterns over time and report concerns rather than attempting to resolve uncertainty themselves.

Children with SEND

Children with special educational needs or disabilities may have greater dependency on adults, more intimate care needs, communication barriers, reduced opportunity to disclose and an increased risk that signs are attributed to disability or behaviour. Staff must make reasonable communication adjustments, use agreed communication methods and treat non-verbal indicators with the same seriousness as spoken disclosures.

7. Responding to a disclosure or concern

A calm, prompt and child-centred response can protect the child and preserve the quality of information for statutory agencies.

7.1 If a child tells you something

1. Make sure the immediate environment is safe. If there is urgent danger or a medical emergency, call 999.
2. Listen carefully and remain calm. Give the child time and use communication support already identified for them where appropriate.
3. Take the child seriously. Reassure them that they have done the right thing by speaking and that they are not to blame.
4. Do not promise confidentiality. Explain simply that you need to share the information with people who can help keep them safe.
5. Do not investigate, challenge the account, ask leading or repeated questions, confront the alleged person, or ask the child to repeat the account to several people.
6. Use only open prompts needed for immediate safety, such as "Tell me what happened" or "Is anyone in danger now?".
7. Report immediately to the office and DSL. Do not wait until the end of the route, the end of the day or a scheduled meeting if action may be needed sooner.
8. Make a factual written record as soon as possible, using the child's exact words where you can, and record what you saw, heard and did.

7.2 Recording requirements

- Child's name and any identifying details needed to act safely.
- Date, time and location of the incident, observation or disclosure.
- Who was present and how the information came to light.
- The child's exact words, clearly distinguished from the recorder's observations or opinion.
- Visible injuries or behaviour observed, described factually. Do not take photographs unless specifically authorised through a lawful safeguarding process.
- Any immediate safety action, people contacted, advice received, decisions made and the reasons for those decisions.
- Name, role, signature or secure electronic identifier, and date and time of the record.

Do not investigate

It is not the worker's role to decide whether abuse has occurred. Asking detailed questions, contacting the alleged person or trying to obtain proof can increase risk, contaminate evidence and undermine a statutory investigation.

8. Reporting, referral and escalation

8.1 Immediate danger

Where a child is in immediate danger, a serious crime is in progress, urgent medical attention is required, or delay would increase the risk of harm, the worker must call 999. Once it is safe to do so, they must notify the office and DSL and make the required record.

8.2 All other concerns

All safeguarding concerns must be reported immediately to the office or directly to the DSL. A manager receiving a concern must pass it to the DSL without delay and must not decide alone that the concern is too minor, unproven or outside the company's responsibility.

The DSL will consider the child's immediate safety, the need for Family Help or other support, and whether to refer to local authority children's social care, the police or another statutory service. Relevant information may also need to be shared with the commissioning authority, school or educational setting, but this must not be used as a substitute for a statutory referral where one is required.

Anyone who has concerns that a child is suffering or is likely to suffer significant harm should ensure an immediate referral is made to local authority children's social care. Staff may make a direct referral where the DSL is unavailable, where delay would increase risk, or where they believe the concern has not been acted on appropriately. They should inform the DSL as soon as it is safe and appropriate to do so.

8.3 Statutory reporting duties

Where a statutory duty to report suspected child sexual abuse is in force and applies to a worker, the worker must comply with that duty as soon as practicable using the prescribed police or local authority route. Reporting internally does not replace a personal statutory duty, and no person may prevent or deter a worker from making a required notification. The worker should also inform the DSL as soon as it is safe and lawful to do so.

8.4 Parental or carer notification

The DSL will normally seek to work openly with parents and carers, but they must not be informed before advice or referral where doing so may place the child or another person at greater risk, prejudice a police or social care investigation, lead to evidence being destroyed, or cause avoidable delay. Staff must not contact parents or carers about a safeguarding disclosure unless authorised to do so.

8.5 Follow-up and professional escalation

- The referrer or DSL should obtain acknowledgement and feedback from children's social care where appropriate.
- If no response is received, or the response does not address the risk, the concern must be followed up and escalated through local multi-agency procedures.
- Disagreement between organisations must never result in inaction or unsafe delay.
- All decisions, including decisions not to refer, must be recorded with clear reasons and any review or monitoring action.

9. Concerns or allegations about people who work with children

Concerns about a Driver, Passenger Assistant, manager, office worker, contractor, volunteer or any other person working with children must be reported immediately. Safeguarding action and a fair employment process must run in a coordinated way; one must not delay the other where a child may be at risk.

9.1 Allegation threshold

An allegation may meet the statutory position-of-trust threshold where a person who works with children 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; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children, including transferable risk arising from conduct outside work.

An allegation must be reported to a senior manager and the DSL immediately. The LADO, or equivalent local authority team, must be informed within one working day where the threshold may be met. Police or children's social care must be contacted sooner where there is immediate risk or suspected criminality. Internal fact-finding must not begin before advice is obtained where this could compromise statutory enquiries.

9.2 Where the concern is about a senior person

- A concern about the DSL must be reported to the Managing Director or nominated Board Director and, where necessary, directly to the LADO, children's social care or police.
- A concern about the Managing Director must be reported to the Chair or another independent Board Director and, where necessary, directly to the relevant statutory agency.
- Where a worker believes internal reporting is unsafe, compromised or ineffective, they may use the whistleblowing route or report directly to the statutory agency.

9.3 Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted in a way that is inconsistent with the Code of Conduct, including conduct that does not appear to meet the allegation threshold. Examples include over-familiarity, favouritism, humiliating or intimidating language, inappropriate personal communication, unauthorised gifts, photography, contact through social media, avoidable secrecy or boundary breaches.

Low-level concerns must be reported and recorded so that patterns can be identified and addressed. They must not be ignored because no single incident appears serious. The DSL and HR will determine proportionate action, whether LADO advice is required, and whether other children, records or settings need to be considered.

9.4 Interim safeguards, support and referrals

- Immediate risk controls may include removing duties involving children, changing deployment, increasing supervision or suspension. Suspension is a neutral safeguarding measure and is not automatic or a finding of guilt.
- The child and the person subject to the allegation should be given appropriate support and information, subject to confidentiality and statutory agency advice.
- 24x7 will complete internal processes even if the person resigns or stops working for the company.
- Where the legal conditions are met, 24x7 will make a referral to the Disclosure and Barring Service. A DBS referral may be required in addition to referrals to the LADO, police, children's social care or a professional regulator.

10. Safer recruitment and ongoing suitability

24x7 will use recruitment, vetting and deployment controls proportionate to the safeguarding risk of each role. Driving a vehicle used only for conveying children and any carers or supervisors on more than three days in a 30-day period is regulated activity with children, and regular care or supervision of children is also regulated activity. The removal of the supervision exemption from 1 September 2026 means that regular supervised volunteers may also fall within regulated activity and require barred-list checks where legally eligible.

10.1 Pre-employment and deployment checks

- A completed application and a structured, safeguarding-aware interview.
- Proof of identity, address, right to work and relevant licences or qualifications.
- A complete employment history with appropriate discussion of gaps, changes and inconsistencies.
- Suitable references verified from reliable sources and considered alongside all other information.
- An Enhanced DBS check with Children's Barred List information where the role is legally eligible, plus any required Update Service status check.
- Overseas criminal record or other suitability checks where the person has lived or worked outside the UK, so far as lawful and reasonably obtainable.
- Checks of driving licence, private-hire licensing, training and other role-specific compliance requirements where applicable.
- A documented decision by an authorised person that all required checks and training are complete before deployment into regulated activity.

No deployment before clearance

No person may undertake regulated activity for 24x7 until all checks required for the role have been completed, reviewed and approved. A person who is barred from the relevant activity must never be permitted to undertake it.

10.2 Ongoing suitability

- Workers must disclose relevant changes in criminal, licensing, professional or personal circumstances in accordance with company requirements.
- DBS Update Service checks, licence checks and other renewals will be completed at the frequency set by company procedure and contract requirements.
- Role or duty changes must trigger a fresh assessment of DBS eligibility and other safeguarding controls.
- Contractors and subcontractors must provide sufficient evidence of equivalent vetting, training and ongoing monitoring. 24x7 may audit this evidence.
- Concerns arising after appointment will be assessed promptly and may lead to risk controls, investigation, referral or removal from duties.

11. Training, competence and supervision

Safeguarding competence is an ongoing requirement, not a one-off course. Training must be appropriate to the role and the needs of the children using the service.

- All workers must receive safeguarding and child protection induction before undertaking duties involving children and must confirm that they understand this policy, reporting routes and the Code of Conduct.
- Drivers and Passenger Assistants must complete the training required for their role and contract before deployment.
- Passenger Assistants must complete relevant passenger assistant training. Anyone securing or assisting a wheelchair user must be appropriately trained and competent before undertaking that duty.

- Safeguarding training will be refreshed at least annually, with shorter updates whenever law, guidance, local learning or operational risk changes.
- Training will cover recognising abuse, neglect and exploitation; child-on-child abuse; online harms; SEND and accessible communication; professional boundaries; disclosures; reporting and recording; allegations; information sharing; whistleblowing; and transport-specific safeguarding.
- Managers and office staff must receive additional training on immediate decision-making, local referral routes, LADO procedures, escalation and preservation of records.
- The DSL and deputies must maintain advanced, role-appropriate knowledge and participate in relevant professional updates and local safeguarding arrangements.
- Completion, understanding and competence will be recorded, monitored and followed up. Failure to complete mandatory training may prevent deployment.

12. Safe working in transport operations

Transport staff often work in close proximity to children, sometimes one-to-one and without another professional present. Clear boundaries, accurate allocation and consistent handover arrangements are therefore essential.

Stage	Required practice	Non-negotiable safeguard
Before the journey	Confirm the correct child, route, authorised staff, vehicle, collection and handover arrangements. Review the passenger plan, risk information and communication or mobility needs. Ensure the vehicle and required equipment are safe and ready.	Do not begin a duty if the allocation or safety information is unclear; contact the office.
Collection and identity	Use approved identity and booking information. Do not accept an unplanned passenger, substitute adult or material change without office verification.	Never rely on informal messages between families or staff where authorisation is required.
During transport	Maintain professional, respectful and age-appropriate communication. Follow the authorised route and passenger plan. Use seatbelts, specialist restraints and equipment correctly. Keep the child supervised in accordance with the assessed arrangements.	No personal errands, unauthorised detours, smoking, vaping, alcohol, drugs, inappropriate conversation or avoidable isolation from oversight.
Professional boundaries	Do not exchange personal contact details, connect through personal social media, arrange contact outside the service, give or accept unauthorised gifts, photograph or record children, or use information about one child in conversation with another family.	Use only approved company communication channels and devices.
Handover	Release a child only to the authorised person or setting in line with the booking and passenger plan. If the responsible adult is absent, identity is uncertain or the situation feels unsafe, keep the child safe, contact the office and follow the no-handover procedure.	A child must never be left unattended or released to an unauthorised person.
Behaviour and physical intervention	Use de-escalation, agreed communication strategies and the passenger plan. Physical intervention may be used only where immediately necessary to prevent injury and must be reasonable, proportionate and reported. Approved harnesses and restraints must be authorised, risk assessed and used only by trained staff.	Physical intervention must never be used as punishment, intimidation or routine behaviour management.

Stage	Required practice	Non-negotiable safeguard
Medication and personal care	Do not administer medication or provide personal care unless this is expressly authorised, risk assessed, documented and supported by appropriate training and consent arrangements.	Seek office and clinical or emergency advice where an unplanned need arises.
Digital and online concerns	Do not view, copy, print, forward or investigate suspected indecent images or harmful digital content. Preserve the device or message where safe, avoid further access and report immediately for DSL or police advice.	Never use a personal device to store safeguarding information.
Unexpected absence or change	Report repeated non-attendance, unexplained absence, significant changes in behaviour or appearance, concerning handovers, changes in who is present at home, or information suggesting increased risk.	Do not assume another agency already knows.
Incident or emergency	Stop safely, protect life, call emergency services where necessary, notify the office and follow incident reporting requirements. Safeguarding reporting is required in addition to operational incident reporting where harm or risk is suspected.	Operational pressures must not override child safety.

Child-on-child incidents in a vehicle

Do not dismiss sexualised, violent, discriminatory or coercive behaviour as banter. Intervene safely, separate children where necessary, protect immediate safety, notify the office and DSL, record each child's account separately and preserve relevant evidence. Serious incidents may require police or children's social care referral.

13. Information sharing, recording and confidentiality

13.1 Information sharing

Safeguarding information may be shared without consent where there is a lawful basis and sharing is necessary and proportionate to protect a child or another person. Staff should be transparent with children and families where it is safe to do so, but the need to seek consent must not delay action or increase risk.

- Share only information that is relevant, necessary, proportionate, accurate, timely and secure.
- Share with people and agencies that need the information to protect the child or carry out their statutory role.
- Record what was shared, with whom, when, why and under whose authority, including reasons for a decision not to share.
- Seek advice from the DSL or Data Protection Officer where there is uncertainty, but do not allow uncertainty to cause unsafe delay.
- Respect the child's privacy. Safeguarding information must not be discussed casually, shared through personal messaging or disclosed to people who do not need to know.

13.2 Safeguarding records

Safeguarding records will be held securely, access will be restricted to those with a legitimate need to know, and retention and disposal will follow the company retention schedule and legal requirements. Records should be separate from routine operational notes where appropriate, with clear cross-reference so that important information is not lost.

Safeguarding records must not be altered to conceal earlier information. Corrections or later information must be dated, attributed and added transparently. Electronic systems must preserve an audit trail.

13.3 Confidentiality during allegations and investigations

Information about an allegation, the child and the person subject to concern must be restricted to those who need it for safeguarding, investigation, support or fair employment action. Staff must not discuss the matter with colleagues, families, on social media or with the alleged person unless authorised. Statutory agencies may direct what can be shared and when.

14. Complaints, whistleblowing and professional challenge

Children, parents, carers and commissioners must be able to raise concerns and complaints in accessible ways. A complaint that includes a safeguarding issue must be referred immediately under this policy and must not be managed only as a customer service complaint.

- Staff should first use the internal safeguarding route where it is safe and effective to do so.
- Concerns about unsafe practice, concealment, delay, retaliation or failure to follow this policy may be raised under the Whistleblowing Policy.
- A worker may contact the relevant local authority, LADO, police, regulator or other statutory body directly where internal action is compromised or inadequate.
- Managers must support respectful professional challenge. Seniority, commercial pressure, contract sensitivity or reputational concern must never be used to suppress a safeguarding concern.
- No person will be penalised for raising a genuine concern in good faith, even where the concern is not ultimately substantiated.

15. Monitoring, assurance and review

The Group Safeguarding Lead will maintain oversight of implementation and report significant themes and assurance to the Board. Monitoring will include, as appropriate:

- completion and quality of recruitment, DBS, barred-list, licensing and training controls;
- timeliness and quality of concern reports, referrals, escalation and follow-up;
- allegations, low-level concerns, complaints, whistleblowing and disciplinary themes;
- contractor and subcontractor assurance;
- audit findings, local authority feedback, serious incidents and learning reviews;
- children's and families' feedback, including accessibility and inclusion;
- effectiveness of actions taken to reduce repeat concerns or systemic risk.

This policy will be reviewed at least annually and earlier where there is a significant safeguarding incident, change in legislation or statutory guidance, learning from a review, material change in service delivery, or evidence that the policy is not working effectively.

15.1 Implementation of Version 4

- Publish the approved electronic Version 4 and withdraw Version 3 and all earlier superseded copies from local systems and shared folders.
- Confirm the current DSL, deputy, local children's social care, emergency duty team and LADO details for every operating area.
- Brief managers, office teams, Drivers, Passenger Assistants, contractors and subcontractors that Version 4 corrects the document dates and clarifies the Purpose section; the safeguarding duties and reporting requirements remain unchanged.
- Update references to the policy version and effective date in induction materials, annual refresher training, recruitment checklists, contractor assurance and safeguarding record templates.

- Require staff to use the current controlled version and investigate any gap in understanding or compliance before deployment continues.
- Complete a final legal and guidance validation immediately before approval and issue in September 2026, including commencement regulations and statutory guidance for mandatory reporting of child sexual abuse.
- Complete an implementation audit within three months of the effective date and report outstanding actions to the Board.

Appendix A - Immediate safeguarding response

1. Is anyone in immediate danger or in need of urgent medical help?

- YES: call 999, take reasonable steps to protect life and safety, then inform the office and DSL as soon as it is safe.
- NO: move to step 2 without delay.

2. Listen and reassure

- Stay calm. Take the child seriously. Use accessible communication. Do not promise secrecy.
- Ask only open questions needed for immediate safety. Do not investigate or confront anyone.

3. Report immediately

- Contact the office and DSL. If unavailable, if delay increases risk, or if the concern is not acted on, make a direct referral to children's social care or police.
- Concerns about a person who works with children must also be escalated for LADO advice.

4. Record facts

- Record date, time, place, people present, the child's exact words, observations and actions taken.
- Do not photograph injuries or copy digital evidence unless specifically authorised.

5. Follow up and escalate

- Confirm the concern has been received and appropriate action is underway.
- Escalate if the response does not address the risk. Record decisions and outcomes.

Appendix B - Examples of indicators

Indicators must be considered in context. They do not prove abuse and should not be used as a checklist to dismiss a concern. Report patterns, changes and professional unease.

Area	Possible indicators	Staff response
Physical	Unexplained or repeated injuries; injuries inconsistent with the explanation or child's development; fear of a particular adult; flinching; concealed injuries; delay seeking treatment.	Describe what is observed. Do not examine beyond what is necessary for immediate safety.
Emotional	Extreme withdrawal or aggression; low self-worth; hypervigilance; fear of making mistakes; developmentally inappropriate behaviour; humiliation, threats or coercive control witnessed.	Consider changes over time and the child's communication style.
Sexual	Sexualised behaviour or knowledge inconsistent with age or development; pain or injury; fear of a person or place; gifts or money; online grooming; coercion; disclosure or concerning images.	Do not search devices, copy images or ask the child for details beyond immediate safety.
Neglect	Persistent hunger, poor hygiene, unsuitable clothing, untreated medical needs, unsafe supervision, fatigue, repeated missed journeys or education, or a child regularly left without an appropriate adult.	A single sign may have several explanations; report concerns and patterns.
Exploitation	Unexplained money, phones or possessions; going missing; secrecy; older associates; multiple phones; sudden travel patterns; fear, debt, threats, carrying items for others, or unexplained injuries.	Consider harm outside the home and online as well as family circumstances.
Domestic abuse	Child distressed at handover; references to violence, fear or controlling behaviour; damage at home; a parent visibly frightened; stalking or harassment around transport.	Do not challenge the alleged perpetrator. Protect immediate safety and report.
Child-on-child harm	Bullying, intimidation, sexual comments, unwanted touching, coercion, discriminatory abuse, assault, threats, sharing images or controlling behaviour between children.	Treat all children involved as potentially needing safeguarding support.
Radicalisation / prejudice-based harm	Expressions of extremist ideology, isolation, online influence, threats, fixation on violence, racist or faith-targeted abuse, or significant changes in peer group and behaviour.	Report safeguarding concerns; do not debate or investigate ideology.

Appendix C - Safeguarding contact routes

Current names, telephone numbers, email addresses and local authority links must be maintained in the company safeguarding contact directory and be available to staff before deployment. This role-based appendix remains valid when personnel change.

Concern or need	Primary route	Action
Immediate emergency	Police, ambulance or fire and rescue service	Call 999.
Operational reporting	Local 24x7 office / duty manager	Use the published operational contact route and state clearly that it is a safeguarding concern.
Safeguarding advice and action	Group Safeguarding Lead / DSL or deputy	Use the current safeguarding directory. Contact directly where urgent or where the office route is unavailable.
Child protection referral	Local authority children's social care / Multi-Agency Safeguarding Hub / emergency duty team	Use the local authority in which the child is currently located or normally resident, guided by local procedure. Do not delay where immediate protection may be needed.
Allegation about a worker	Local Authority Designated Officer (LADO) or equivalent team	The DSL or senior manager should seek advice and notify within one working day where the allegation threshold may be met.
Suspected crime or non-emergency police advice	Police	Use 101 or the local police safeguarding route, unless the situation requires 999.
Commissioner / school liaison	Contracting authority, school or educational setting safeguarding contact	Share on a need-to-know basis after immediate safeguarding action. This is not a substitute for statutory referral.
Internal conduct / employment action	HR and authorised senior manager	Coordinate fair employment action with DSL and statutory agency advice.
Data protection advice	Data Protection Officer	Seek advice where needed, but do not delay necessary safeguarding sharing.
Whistleblowing / escalation	Internal whistleblowing route or relevant statutory body	Use where internal safeguarding action is unsafe, compromised or ineffective.

Final reminder

Safeguarding is not complete when a concern is passed on. The person receiving or referring the concern must ensure it has reached the right safeguarding lead or statutory agency, record the action and escalate if the child remains at risk.