



Write-Trak Limited
Safeguarding Policy
2026 – 2027

1 Safeguarding

Write-Trak Limited recognises that safeguarding children and young people is a fundamental responsibility of the organisation and everyone who works on its behalf.

Write-Trak provides educational and tutorial services to children and young people, including children who may be particularly vulnerable because of exclusion from mainstream education, special educational needs, disability, social circumstances, previous experiences of trauma, family circumstances or other factors.

The company therefore recognises that safeguarding cannot be treated as a separate or occasional activity. It is an integral part of the way Write-Trak operates, recruits staff and tutors, delivers education, communicates with children and families, manages information and responds to concerns.

Safeguarding means protecting children from maltreatment, preventing impairment of their health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable children to have the best possible outcomes.

All children and young people under the age of 18 have the right to be protected from abuse, neglect, exploitation and other forms of harm.

Write-Trak recognises that safeguarding is everyone's responsibility. No single member of staff or professional will necessarily have the complete picture of a child's circumstances. Effective safeguarding therefore depends upon staff and tutors being willing to recognise concerns, listen to children, share information appropriately and take prompt action.

Write-Trak will maintain a child-centred approach. The child's welfare and best interests will remain at the centre of safeguarding decisions, while recognising that the child's wishes and feelings should be listened to and taken into account wherever possible.

The company's safeguarding arrangements have been developed with regard to relevant legislation and statutory guidance, including the Children Act 1989, the Children Act 2004, the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Children and Social Work Act 2017, relevant information-sharing requirements, the Prevent duty and current Department for Education safeguarding guidance.

For the 2026–2027 academic year, Write-Trak has regard in particular to the principles and expectations contained within Keeping Children Safe in Education 2026, coming into force 1st September 2026, and Working Together to Safeguard Children 2026. Keeping Children Safe in Education 2026 ([GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/90060/Keeping_Children_Safe_in_Education_2026.pdf))

Working Together to Safeguard Children 2026 applies to education providers and sets out the framework for organisations and agencies to work together to safeguard and promote children's welfare. ([GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/90060/Working_together_to_safeguard_children_2026.pdf))

Write-Trak will also take account of relevant local safeguarding arrangements and procedures in the areas in which it operates.

Specifically, Write-Trak:

- recognises that every child has the right to feel safe and protected from abuse and neglect;
- recognises that safeguarding is the responsibility of every member of staff and every tutor;
- will take seriously all concerns about the welfare of a child;
- will provide clear procedures for reporting safeguarding concerns;
- will ensure that staff and tutors receive appropriate safeguarding training;
- will maintain appropriate safer recruitment procedures;
- will ensure safeguarding concerns are recorded accurately and securely;
- will work with parents, carers, schools, local authorities, children's social care, the police and other relevant agencies where appropriate;
- will respect children's rights, wishes and feelings;
- will promote equality and challenge discriminatory behaviour;
- will provide appropriate support for children with special educational needs and disabilities;
- will recognise the particular safeguarding risks associated with children who are missing from education;
- will recognise online safeguarding risks;
- will maintain appropriate procedures for allegations against staff, tutors and other adults;
- will maintain an effective whistleblowing process so that safeguarding concerns about the organisation itself can be raised safely; and
- will review its safeguarding arrangements regularly.

Write-Trak recognises that children's circumstances can change and that safeguarding concerns can develop or escalate over time. Staff and tutors must therefore remain alert to changes in behaviour, attendance, presentation, communication, relationships or circumstances.

Write-Trak will work on the basis that safeguarding concerns should be acted upon rather than ignored because they appear isolated or uncertain. Staff should maintain an attitude of "it could happen here" when considering safeguarding.

Write-Trak's approved safeguarding officers are:

Designated Safeguarding Lead (DSL): Paul Blacker

Deputy Designated Safeguarding Lead (DDSL): Gerry McMahon

Any concern about a child should be discussed with the Safeguarding officers where practicable. However, no member of staff or tutor should delay making an appropriate referral because the DSL or DDSL is unavailable.

1.1 Safeguarding officers

1.1.1 The designated safeguarding lead

Write-Trak will appoint a Designated Safeguarding Lead (DSL) who has sufficient seniority, authority and access to the company's leadership to carry out the responsibilities of the role.

The DSL will take lead responsibility for safeguarding and child protection within Write-Trak. The DSL will provide advice and support to staff and tutors, coordinate safeguarding referrals, maintain appropriate safeguarding records and act as the principal point of contact for external safeguarding agencies.

The DSL will ensure that safeguarding concerns are considered promptly and that appropriate action is taken.

The DSL will maintain appropriate links with local safeguarding arrangements and relevant agencies. Where necessary, the DSL will participate in multi-agency meetings, strategy discussions, child protection conferences, assessments and other safeguarding processes, or ensure that an appropriate representative does so.

The DSL will ensure that safeguarding records are maintained securely and separately from general educational records where appropriate.

The DSL will also ensure that safeguarding information is shared with relevant professionals where there is a lawful and appropriate basis for doing so and where sharing is necessary to protect a child.

The DSL will ensure that Write-Trak staff and tutors are aware of this policy and understand the procedures for raising safeguarding concerns.

The DSL will receive appropriate safeguarding and child protection training and will keep their knowledge and skills up to date. Formal DSL training will be refreshed in accordance with current statutory guidance and local arrangements, and knowledge will be maintained through regular updates and professional development.

1.1.2 Deputy designated safeguarding lead

Write-Trak has appointed a Deputy Designated Safeguarding Lead (DDSL) to provide support and appropriate cover for the DSL.

The DDSL will be appropriately trained and will be able to undertake safeguarding responsibilities when delegated to do so.

Although safeguarding activities may be delegated to a suitably trained deputy, ultimate responsibility for safeguarding within Write-Trak remains with the DSL and the company's leadership.

The DSL and DDSL will communicate regularly where there are active safeguarding concerns and will ensure that appropriate cover arrangements are in place during periods of absence.

1.2 Referrals

Where there are reasonable grounds to believe that a child is suffering, or is likely to suffer, significant harm, Write-Trak will make an appropriate referral to children's social care and / or the police without delay.

The DSL / DDSL will normally coordinate referrals. However, all staff and tutors have the right and responsibility to make a referral themselves if they believe that this is necessary to protect a child.

The DSL / DDSL will:

- refer suspected abuse or neglect to children's social care where appropriate;
- support staff and tutors who make safeguarding referrals;
- refer concerns involving possible radicalisation through the appropriate local Prevent or Channel arrangements;
- refer matters involving possible criminal offences to the police;
- make appropriate referrals to the Disclosure and Barring Service where the statutory criteria are met;
- liaise with relevant safeguarding agencies;
- maintain accurate records of referrals and decisions; and
- ensure that safeguarding concerns are followed up where appropriate.

Where a referral is made by someone other than the DSL, that person should inform the DSL as soon as practicable unless there is a good reason not to do so.

No member of staff should assume that another person will make a referral. Where immediate action is required, the person who has the concern must act.

1.3 Liaising with other agencies

Write-Trak recognises that effective safeguarding requires cooperation between organisations.

The company will cooperate with children's social care, local safeguarding arrangements, the police, health services, schools, colleges, local authorities and other relevant agencies where this is necessary to safeguard a child.

Write-Trak will provide information requested by relevant safeguarding agencies where there is a lawful basis for doing so.

Information-sharing decisions will be made in accordance with applicable data protection legislation and safeguarding requirements.

Data protection legislation does not prevent appropriate safeguarding information from being shared where there is a lawful basis and sharing is necessary to protect a child. Staff should not allow concerns about data protection to prevent necessary safeguarding action.

Write-Trak will follow relevant local safeguarding procedures where these apply to a particular child or case.

1.4 Safeguarding training

The DSL and DDSL will receive appropriate safeguarding and child protection training.

All staff and tutors working with children will receive safeguarding information and training appropriate to their role.

Safeguarding training will take place as part of induction and will be refreshed regularly, with safeguarding updates provided at least annually.

Training will include recognition of abuse and neglect, responding to disclosures, reporting procedures, online safety, professional boundaries, safer working practices and relevant safeguarding risks.

The DSL will also undertake appropriate Prevent awareness training and ensure that staff understand how concerns about radicalisation should be identified and reported.

The company will ensure that safeguarding knowledge is refreshed through updates, guidance, meetings, communications and other appropriate means.

1.5 Availability

The DSL or DDSL will be available during normal Write-Trak operating hours for staff and tutors to discuss safeguarding concerns.

Where the DSL or DDSL cannot be contacted immediately, staff and tutors must not delay action where a child may be at risk.

In an emergency, staff and tutors should contact the appropriate emergency service or safeguarding agency directly and then notify the DSL as soon as possible.

The company will maintain appropriate arrangements for safeguarding concerns arising outside normal working hours.

1.6 Raising awareness

Write-Trak will ensure that its safeguarding policy is made available to staff, tutors and other relevant stakeholders.

Staff and tutors will be informed of the identity and role of the DSL and DDSL.

Children and young people will be made aware, in an age-appropriate manner, that they can speak to trusted adults if they feel unsafe or are worried about themselves or someone else.

Parents and carers will be able to access information about Write-Trak's safeguarding arrangements.

The company will review its safeguarding policy annually and whenever there is a significant change in legislation, statutory guidance, local safeguarding arrangements or organisational practice.

1.7 Inter-agency working

Write-Trak recognises the importance of multi-agency working.

The company will work constructively with safeguarding partners and other relevant agencies and will contribute information, professional observations and relevant records where appropriate.

The 2026 Working Together guidance strengthens expectations around multi-agency safeguarding, early help, child protection and information sharing. Write-Trak will cooperate with these arrangements where they apply to children receiving its services. ([GOV.UK](https://www.gov.uk))

Where another organisation, such as a school or local authority, has lead responsibility for a child's education or safeguarding plan, Write-Trak will cooperate with that organisation while continuing to act on any safeguarding concerns identified by its own staff or tutors.

1.8 Staff and tutor training

All staff and tutors will receive safeguarding information appropriate to their responsibilities.

Training will enable staff and tutors to recognise indicators of abuse and neglect and understand what action to take.

Staff and tutors will receive regular safeguarding updates and will be expected to familiarise themselves with changes to this policy.

Write-Trak recognises that tutors may be in a particularly important position to identify safeguarding concerns because of their regular contact with individual children. Tutors should therefore record and report concerns rather than attempting to investigate them themselves.

The DSL / DDSL will support staff and tutors in carrying out their safeguarding responsibilities.

1.9 Online safety

Write-Trak recognises that children may be exposed to significant safeguarding risks through the internet, social media, online gaming, messaging services and other digital platforms.

Online risks may include grooming, sexual exploitation, cyberbullying, sexual harassment, sharing of sexual images, exposure to harmful content, coercion, fraud, extremist material and contact with individuals seeking to exploit children.

Where Write-Trak provides online teaching or communicates electronically with children, appropriate professional boundaries must be maintained.

Staff and tutors must use approved communication methods wherever possible and must not establish inappropriate private relationships with children through personal social-media accounts or messaging services.

Concerns about online abuse or exploitation must be reported through the same safeguarding procedures as concerns arising offline.

1.10 Opportunities to teach safeguarding

Write-Trak will use appropriate opportunities within its tutors and educational work to help children understand how to keep themselves safe.

Depending upon the age and circumstances of the child, this may include personal safety, relationships, online safety, bullying, exploitation, healthy boundaries, appropriate communication and knowing where to seek help.

Teaching will be age-appropriate and sensitive to the individual needs and circumstances of the child.

Where a tutor becomes aware of a safeguarding concern while delivering such learning, the matter must be reported in accordance with this policy.

1.11 Safer recruitment

Write-Trak recognises that safer recruitment is an essential part of safeguarding.

The company will take appropriate steps to prevent unsuitable individuals from working with children.

Recruitment decisions will include appropriate checks for the role being undertaken, including DBS checks where legally required or appropriate.

The level of DBS check will be determined by the duties and regulated activity associated with the role rather than automatically applying the same level of check to every individual.

Where appropriate, references, identity checks, employment history, qualifications and other relevant information will also be considered.

Write-Trak will ensure that self-employed tutors working on its behalf understand and comply with relevant safeguarding requirements.

Where a person is unsuitable to work with children, Write-Trak will take appropriate action and make any legally required referral to the DBS or other relevant authority.

1.12 Allegations against staff, tutors, volunteers and other adults

Write-Trak recognises that safeguarding concerns may arise in relation to a member of staff, tutor, volunteer, contractor or other adult working with children.

All allegations will be taken seriously and handled fairly, promptly and confidentially.

Where an allegation concerns an adult working for Write-Trak, the matter will be reported to the Director and / or DSL or DDSL in accordance with the company's procedures.

Where the allegation concerns the DSL / DDSL, the matter must be reported to the Director.

Where the allegation concerns the Director, the concern must not be dealt with by the Director and should be referred to the appropriate local authority safeguarding arrangements, including the Local Authority Designated Officer (LADO) where applicable.

Write-Trak will cooperate fully with any investigation undertaken by the local authority, police or other appropriate agency.

The company will take appropriate steps to protect the child from further risk while an allegation is being considered. This may include removing a tutor from contact with the child or changing arrangements for tuition.

Any action taken against an employee or tutor will follow appropriate employment, contractual and safeguarding procedures.

Write-Trak will make a referral to the Disclosure and Barring Service where the statutory criteria are met.

1.12.1 Procedure following an allegation

The company will avoid undertaking its own investigation, where doing so could prejudice a police or safeguarding investigation.

Information will be recorded accurately and contemporaneously.

The child will be supported and their welfare will remain the primary consideration.

The adult against whom an allegation has been made will be treated fairly and will be provided with appropriate support, subject to safeguarding and investigative requirements.

Where appropriate, the child's school, parent or carer and relevant safeguarding agencies will be informed.

Write-Trak will maintain confidentiality and will only share information with people who need it for safeguarding, employment, legal or investigative purposes.

1.12.2 Abuse between children and young people.

Write-Trak recognises that children can abuse other children.

Peer-on-peer abuse may include bullying, cyberbullying, sexual harassment, sexual violence, coercive behaviour, physical assault, initiation or hazing, sharing of sexual images, grooming, exploitation or other harmful behaviour.

Such behaviour must never be dismissed as “banter”, “just playing” or “part of growing up”.

All concerns will be taken seriously.

Write-Trak will consider the needs of both the child who has been harmed and the child alleged to have caused harm.

Where appropriate, parents, carers, schools, children's social care, the police or other agencies will be involved.

Children who display harmful behaviour may themselves have safeguarding needs, and these will be considered as part of the response.

1.13 The child's wishes and feelings

Write-Trak will listen to children and young people and will take their wishes and feelings into account when making safeguarding decisions.

Staff and tutors should create an environment in which children feel able to speak openly about concerns.

Children should not be promised absolute confidentiality. Staff should explain that information may need to be shared with people who can help keep them safe.

The child's wishes will be considered alongside the need to protect the child and comply with safeguarding responsibilities.

1.14 Looked after and previously looked-after children

Looked-after and previously looked-after children may have experienced abuse, neglect, instability or trauma and may therefore have particular safeguarding needs.

Write-Trak will take account of the child's individual circumstances and will cooperate with the relevant school, local authority, social worker, carer and other professionals.

Information about a child's legal status, care arrangements and relevant safeguarding needs will be handled confidentially and shared appropriately with those who need it to safeguard the child.

1.15 Children with special educational needs and disabilities.

Children with special educational needs and disabilities (SEND) may face additional safeguarding barriers.

Communication difficulties, dependence on adults, social isolation, difficulty recognising inappropriate behaviour and assumptions that changes in behaviour are attributable solely to a disability can make abuse more difficult to identify.

Write-Trak staff and tutors must therefore consider safeguarding concerns carefully and avoid making assumptions about the cause of changes in behaviour, mood or presentation.

All reasonable adjustments will be made to enable children to communicate concerns and participate in safeguarding processes.

1.16 Safeguarding and child protection records

Write-Trak will maintain accurate, factual and secure records of safeguarding concerns.

Records should distinguish between fact, observation, information provided by another person and professional opinion.

Where a child makes a disclosure, staff should record the child's words as accurately as possible and should avoid leading questions.

Safeguarding records will be kept securely and separately from general educational records where appropriate.

Information will only be shared with those who need it for safeguarding or other lawful purposes.

Where a child transfers to another educational provider, Write-Trak will cooperate with lawful and appropriate requests for safeguarding information and will ensure that any transfer is undertaken securely.

1.17 Staff and tutor responsibilities

Safeguarding is the responsibility of every person working for or on behalf of Write-Trak.

Staff and tutors are often in a position to identify concerns at an early stage and may be the first person to whom a child speaks.

They must therefore understand that safeguarding is not simply the responsibility of the DSL / DDSL.

1.17.1 What staff and tutors should know and do

All staff and tutors should understand that:

- Safeguarding and promoting the welfare of children is everyone's responsibility.
- A child-centred approach should be adopted at all times.
- No single professional is likely to have a complete picture of a child's circumstances.
- Concerns should be reported rather than ignored.
- Information should be shared appropriately where necessary to protect a child.
- Staff should never promise confidentiality where safeguarding information may need to be shared.
- Staff should act in the best interests of the child.
- The 2026 Working Together guidance reinforces the importance of child-centred practice, multi-agency working, early help and recognising that children may experience multiple forms of harm. ([GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616226/Working-Together-for-Children-2026.pdf))

1.17.2 Staff and tutor roles

Tutors have a duty of care towards the children they teach.

They must maintain appropriate professional boundaries and behave in accordance with Write-Trak's professional conduct requirements.

Tutors must not investigate safeguarding allegations themselves.

Where they have a concern, they must report it to the DSL or, where necessary, directly to the appropriate safeguarding agency.

Tutors should remain alert to changes in behaviour, attendance, appearance, communication, relationships, emotional wellbeing and educational engagement.

They should also consider whether a child may benefit from early help.

Early help is support provided when a problem first emerges and before concerns escalate. Where early help appears appropriate, the tutor should discuss the matter with the DSL.

1.17.3 What staff and tutors need to know

All staff and tutors should know:

- the identity of the DSL and DDSL;
- how to report a safeguarding concern;
- what to do if a child makes a disclosure;
- how to respond to an emergency;
- how to maintain professional boundaries;

- how to recognise common indicators of abuse and neglect;
- how to recognise online safeguarding concerns;
- how to report concerns about another adult;
- how to use Write-Trak's whistleblowing procedure;
- and where to obtain further safeguarding advice.

Staff should understand that they must not delay action because they are uncertain whether a concern meets a particular threshold.

1.17.4 What staff and tutors should look out for

Safeguarding concerns may be indicated by changes in behaviour, appearance, attendance, emotional wellbeing, relationships, communication, academic engagement or physical presentation.

There may be no obvious physical sign of abuse.

Staff should also consider the possibility of exploitation, neglect, domestic abuse, online abuse, criminal exploitation, sexual exploitation, radicalisation, bullying, self-harm, mental health difficulties, forced marriage, FGM and other safeguarding concerns.

A single sign may not indicate abuse. However, a pattern of signs, changes or disclosures should always be considered carefully.

1.17.5 Suspected abuse

If a staff member or tutor suspects that a child is being abused or neglected, they must report the concern.

They should not attempt to investigate the matter themselves.

Where a child discloses abuse, the adult should listen calmly, allow the child to speak, avoid leading questions and explain that the information may need to be shared to keep them safe.

The adult should make a factual record as soon as practicable and report the matter to the DSL.

If the concern is urgent or the DSL cannot be contacted, the staff member must contact the appropriate safeguarding agency or police directly.

1.17.6 If staff or tutors have concerns about a child

Where a staff member or tutor has a concern about a child's welfare, they should normally discuss the matter with the DSL as soon as possible.

The DSL will consider whether the matter requires:

- early help;
- support from another professional;
- a referral to children's social care;
- a referral to the police;
- a Prevent or Channel referral;
- or another safeguarding response.

The person who identified the concern may be asked to provide further information or assist with an assessment.

Staff should continue to monitor the situation and should report further concerns even if an earlier referral has already been made.

If a referral has been made and the child does not appear to be receiving appropriate help, the DSL or referring professional should pursue the matter with the relevant agency.

1.17.7 A child is in danger or at immediate risk of harm

Where a child is in immediate danger or is at immediate risk of significant harm, urgent action must be taken.

The police should be contacted where necessary and an appropriate referral made to children's social care.

Staff should not wait for the DSL if doing so would place the child at greater risk.

The DSL should be informed as soon as practicable after emergency action has been taken.

1.17.8 Concerns about another staff member or tutor

Concerns about the behaviour of another staff member, tutor, volunteer or other adult working for Write-Trak must be reported.

Where the concern is about an employee or tutor, it should normally be reported to the Director and DSL in accordance with the allegation's procedure.

Where the concern involves the DSL / DDSL, it should be reported to the Director.

Where the concern involves the Director, the matter should be referred to the appropriate external safeguarding authority, including the LADO where applicable.

No person should suffer retaliation for raising a genuine safeguarding concern.

1.17.9 Concerns about safeguarding practices within Write-Trak

All staff, tutors and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in Write-Trak's safeguarding arrangements.

Such concerns will be taken seriously.

Write-Trak maintains a whistleblowing procedure which allows staff to raise concerns internally and, where necessary, externally.

Where a person feels unable to raise a safeguarding concern with their employer, or believes that the concern has not been addressed appropriately, they may use appropriate external whistleblowing channels.

General information about whistleblowing is available from GOV.UK:

<https://www.gov.uk/whistleblowing>

Staff may also seek advice from the NSPCC whistleblowing service where appropriate.

1.18 Types of abuse and neglect

All Write-Trak staff should understand that abuse, neglect and safeguarding concerns are rarely isolated events. Different forms of abuse may overlap and a child may experience more than one type of abuse at the same time.

Staff should maintain an attitude of “it could happen here” and should report any concern, however minor it may initially appear.

1.19 Abuse

Abuse is the maltreatment of a child. It may involve someone deliberately causing harm or failing to take reasonable action to prevent harm. Abuse can occur within families, in educational or community settings, online or elsewhere. It may be carried out by an adult or by another child.

1.19.1 Physical abuse

Physical abuse includes deliberately causing physical harm to a child. This may include hitting, shaking, kicking, punching, burning, scalding, poisoning, drowning, suffocating or otherwise causing injury. It may also include fabricating or deliberately inducing illness.

1.19.2 Emotional abuse

Emotional abuse involves persistent behaviour that damages a child's emotional development or sense of self-worth. It may include humiliation, threats, rejection, intimidation, controlling behaviour, inappropriate expectations, isolation, persistent criticism or exposing a child to domestic abuse, serious bullying or other harmful behaviour.

1.19.3 Sexual abuse

Sexual abuse involves forcing, persuading or enticing a child to take part in sexual activity, whether or not the child understands what is happening. It may involve physical contact, sexual assault, touching or non-contact activities such as exposing a child to sexual material, creating sexual images, grooming or encouraging sexually inappropriate behaviour. Sexual abuse can occur online and can be perpetrated by adults or other children.

1.19.4 Child Sexual exploitation

Child sexual exploitation is a form of sexual abuse in which a child is exploited for money, power, status, gifts, drugs, accommodation, affection or other benefits. It may involve physical contact or take place online.

Possible indicators include unexplained gifts or possessions, older associates, changes in behaviour, substance misuse, missing episodes or increased absence from education.

1.19.5 Neglect

Neglect is the persistent failure to meet a child's basic physical or emotional needs where this is likely to harm their health or development. It may include failing to

provide adequate food, clothing, shelter, supervision, protection from harm, medical care or emotional support.

1.19.6 Bullying and cyberbullying

Bullying is deliberately hurtful behaviour which is repeated or has the potential to be repeated and where the victim finds it difficult to defend themselves. It may be physical, verbal, emotional, discriminatory or sexual and may take place in person or online.

Write-Trak does not tolerate bullying in any form.

Concerns will be taken seriously, investigated appropriately and dealt with in accordance with the circumstances of the case.

Where appropriate, parents or carers and relevant external agencies will be involved. Serious incidents may require referral to children's social care or the police.

Write-Trak also recognises peer-on-peer abuse, including sexual violence, sexual harassment, coercive behaviour, initiation or hazing, sharing of sexual images and other harmful behaviour between children.

1.19.7 Online abuse and exploitation

Children may be exposed to safeguarding risks through social media, messaging services, gaming platforms and other online environments.

These risks may include grooming, sexual exploitation, cyberbullying, coercion, inappropriate sexual content, sharing of images, extremist material and contact with individuals who seek to harm or exploit children.

Concerns about online abuse must be reported through Write-Trak's safeguarding procedures.

1.19.8 Domestic abuse

Children may be harmed by seeing, hearing or experiencing domestic abuse within their home or family environment.

Domestic abuse can have significant and lasting effects on a child's emotional wellbeing, development and safety.

Any concern that a child may be experiencing or witnessing domestic abuse should be reported to the DSL.

1.19.9 Other safeguarding concerns

Staff should also remain alert to safeguarding concerns including child criminal exploitation, county lines activity, substance misuse, self-harm, mental health concerns, children missing from education, trafficking, modern slavery, forced marriage, female genital mutilation, honour-based abuse and radicalisation.

These concerns may occur alongside other forms of abuse.

The response should be consistent: recognise the concern, listen to the child, record the information accurately, report it promptly and take appropriate action to protect the child.

1.20 Harassment

Write-Trak does not tolerate harassment, discrimination or behaviour that undermines the dignity or safety of children, staff, tutors or other individuals.

Harassment may be verbal, physical, written, online or otherwise communicated.

It may be deliberate or inadvertent and may involve an isolated incident or repeated behaviour.

The fact that behaviour was intended as a joke or was described as “banter” does not prevent it from being inappropriate or harmful.

Any safeguarding concern involving harassment will be dealt with under the appropriate safeguarding, disciplinary or behavioural procedure.

1.20.1 Racial harassment

Racial harassment includes racist language, racial stereotyping, racist jokes, threats, intimidation, exclusion or physical abuse.

Write-Trak will take allegations of racism seriously and will act to protect those affected.

The company will challenge racist behaviour and promote an inclusive and respectful environment.

1.20.2 Sexual harassment

Sexual harassment includes unwanted conduct of a sexual nature.

It may include sexual comments, unwanted touching, sexualised messages, inappropriate images, sexual jokes, requests for sexual activity, sexualised behaviour or other unwanted conduct.

Sexual harassment involving children is a safeguarding concern and must be reported.

Write-Trak will take appropriate action to protect children and will involve external agencies where necessary.

1.20.3 Harassment on grounds of disability

Write-Trak recognises that children and adults with disabilities may experience additional barriers and may be particularly vulnerable to bullying or harassment.

Disability-related harassment may include offensive language, inappropriate jokes, exclusion, intimidation, physical mistreatment or assumptions about a person's abilities.

Write-Trak will take appropriate steps to prevent discrimination and harassment and will make reasonable adjustments where required.

1.21 Victimisation

Write-Trak will not tolerate victimisation of anyone who raises a genuine safeguarding, discrimination, harassment or other legitimate concern.

A person must not be treated unfairly because they have raised a concern, assisted with an investigation or supported another person who has raised a concern.

Any attempt to intimidate or disadvantage someone because they have raised a genuine safeguarding concern will be taken seriously.

1.22 Training

Write-Trak will provide appropriate safeguarding training to staff and tutors.

Employees involved in recruitment or the management or supervision of others will receive appropriate additional training.

The DSL and DDSL will receive training appropriate to their safeguarding responsibilities.

Training will be reviewed regularly to ensure that it reflects current legislation, statutory guidance, local safeguarding arrangements and emerging safeguarding risks.

No employee or tutor will be excluded from safeguarding training on discriminatory grounds.

1.23 Other safeguarding issues

Write-Trak staff and tutors should be aware that safeguarding concerns can arise in many different forms.

These include:

- bullying and cyberbullying;
- children missing from education;
- child sexual exploitation;
- child criminal exploitation;
- domestic abuse;
- drug and alcohol misuse;
- fabricated or induced illness;
- female genital mutilation;
- forced marriage;
- honour-based abuse;
- mental health concerns and self-harm;
- modern slavery and trafficking;
- online abuse;
- radicalisation and extremism;
- sexual harassment and sexual violence;
- and other forms of exploitation or abuse.

Staff should seek advice from the DSL where they are unsure whether a particular concern represents a safeguarding issue.

1.23.1 Children missing from education

Write-Trak recognises that persistent absence, unexplained absence or a child disengaging from education may be an indicator of safeguarding concerns.

A child missing from education may be at increased risk of abuse, neglect, exploitation, criminal activity or radicalisation.

Because Write-Trak provides tutorial services rather than operating as a maintained school, attendance arrangements will normally be coordinated with the school, local authority or other commissioning organisation responsible for the child's education.

Write-Trak will nevertheless report concerns about unexplained or persistent absence promptly to the appropriate person or organisation.

Particular attention will be given to repeated episodes of absence, sudden disengagement, unexplained changes in living arrangements and circumstances in which a child cannot be located.

1.23.2 Honour-based abuse

So-called honour-based abuse is a form of abuse and may include violence, threats, coercion or intimidation carried out in the name of protecting or defending family or community honour.

It can include forced marriage, female genital mutilation and other harmful practices.

Write-Trak will treat any concern that a child may be at risk of honour-based abuse as a safeguarding concern.

Staff should not approach family members or other individuals where doing so could increase the child's risk.

The matter should be reported promptly to the DSL and, where necessary, children's social care or the police.

1.23.3 Female genital mutilation

Female genital mutilation is illegal in the United Kingdom and is a form of child abuse.

Write-Trak staff must never attempt to examine a child.

Where a member of staff receives a disclosure or otherwise becomes aware that FGM may have taken place, the concern must be reported immediately to the DSL / DDSL.

Where a statutory mandatory reporting duty applies to the individual concerned, that duty must be complied with.

Other concerns that a child may be at risk of FGM should be dealt with through normal safeguarding procedures.

Current government guidance should be consulted when responding to a concern:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

1.23.4 Forced marriage

A forced marriage is one in which one or both parties do not consent freely and where pressure, coercion, threats or other forms of control are used.

Forced marriage is different from an arranged marriage where both parties are free to consent.

A child may be at risk of forced marriage because of family pressure, threats, restrictions on movement, plans for overseas travel or other warning signs.

Staff must report concerns to the DSL / DDSL.

Where there is an immediate risk, the police and appropriate safeguarding agencies should be contacted.

Staff must not attempt to mediate between the child and family where this could increase risk.

1.23.5 Preventing radicalisation

Write-Trak recognises that children may be vulnerable to radicalisation.

Radicalisation can occur through personal relationships, family circumstances, online activity, social media or exposure to extremist narratives.

There is no single profile of a child who may be vulnerable to radicalisation.

Staff should be alert to significant changes in behaviour, attitudes, associations or online activity which may indicate that a child requires support.

Concerns should be discussed with the DSL and dealt with through safeguarding procedures.

1.23.6 Prevent

Write-Trak will have regard to the Prevent duty where applicable to its functions and will support the safeguarding arrangements of the schools, colleges and local authorities with which it works.

The Prevent duty requires specified authorities to have due regard to the need to prevent people from being drawn into terrorism. Current government Prevent guidance remains available through GOV.UK. ([GOV.UK](https://www.gov.uk))

The DSL / DDSL will maintain appropriate Prevent awareness and will ensure that staff understand how to raise concerns about possible radicalisation.

Where appropriate, Write-Trak will cooperate with local Prevent arrangements and provide information to relevant safeguarding partners.

1.23.7 Channel

Channel is an early-intervention programme intended to provide support to people who may be vulnerable to being drawn into terrorism.

Where a safeguarding concern indicates that a child may be vulnerable to radicalisation, the DSL / DDSL will consider whether a Prevent or Channel referral is appropriate.

Channel support is voluntary and is intended to provide early help rather than punishment.

Current Channel guidance is available at:

<https://www.gov.uk/government/publications/channel-guidance>

1.24 Record Keeping

Write-Trak will maintain accurate, secure and confidential safeguarding records.

All safeguarding concerns, discussions, decisions and actions should be recorded.

Records should be factual and should clearly distinguish between what was observed, what was disclosed and what action was taken.

Records should include, where appropriate:

- the date and time of the concern;
- the identity of the child;

- the nature of the concern;
- the words used by the child where relevant;
- the action taken;
- who was informed;
- the outcome or response;
- and any subsequent action required.

Staff should avoid recording personal opinions unless they are clearly identified as professional observations or judgements.

Safeguarding records will be stored securely and access will be restricted to those who require access for legitimate safeguarding purposes.

Write-Trak will comply with applicable data protection requirements while recognising the importance of appropriate information sharing for safeguarding.

1.25 Monitoring and review

The Director and DSL will monitor the effectiveness of Write-Trak's safeguarding arrangements.

Monitoring will include consideration of:

- safeguarding concerns and referrals;
- staff and tutor safeguarding training;
- safer recruitment;
- DBS and other required checks;
- record keeping;
- allegations against staff and tutors;
- complaints and whistleblowing concerns;
- online safety;
- attendance and children missing from education;
- the effectiveness of safeguarding procedures;
- feedback from children, parents, schools and other stakeholders where appropriate;
- and changes in legislation, statutory guidance and local safeguarding arrangements.
- The safeguarding policy will be reviewed at least annually.

The next formal review will take place in August 2027.

Where significant changes occur during the academic year, the policy will be reviewed and amended sooner.

Write-Trak will ensure that safeguarding remains an active and continuous part of organisational practice rather than simply a policy requirement.

The company recognises that safeguarding arrangements must evolve as risks change and as new information becomes available. The 2026 Working Together guidance, for example, places increased emphasis on early help, multi-agency working, child sexual abuse, domestic abuse, online harms, group-based exploitation and anti-discriminatory practice. ([GOV.UK](https://www.gov.uk))

Write-Trak will therefore continue to review its practice against current statutory guidance and relevant local safeguarding arrangements.