

Unity Schools Partnership

Rest and Safer Sleep Policy – School-Based Nurseries

Applies to: School-based nursery provision for children aged 2–5 years

Policy owner: Sherise Daly – Trust Early Years Lead

Effective from: 1 September 2026

Review date: September 2027

1. Purpose

At Unity Schools Partnership, we recognise that young children have individual sleep and rest needs. Whilst sleep is not routinely scheduled within our school-based nursery provision, some children may become tired during their session and may need an opportunity to rest or may spontaneously fall asleep.

This policy sets out a consistent Trust-wide approach to ensuring that children can rest or sleep safely, while recognising the developmental needs and individual circumstances of children aged 2–5 years.

The policy should be read alongside:

- the Early Years Foundation Stage (EYFS) Statutory Framework for Group and School-Based Providers, applicable from 1 September 2026;
- the school's Safeguarding and Child Protection Policy;
- relevant risk assessments;
- intimate care procedures;
- health and safety policies;
- first aid and administering medicines procedures;
- the school's policy relating to dummies, comforters and transitional objects; and
- any relevant school policies relating to attendance, collection and child welfare.

The updated EYFS framework from 1 September 2026 includes explicit safer-sleep requirements within the statutory framework. This policy supports schools to implement those requirements consistently within school-based nursery provision.

2. Principles

Unity Schools Partnership recognises that:

- children have individual sleep and rest needs;
 - sleep should not be routinely imposed where a child does not need or want to sleep;
 - children should not ordinarily be prevented from sleeping when they are clearly tired, unless there is a health, safeguarding or other appropriate reason;
 - any sleep or rest arrangement must be safe, age-appropriate and developmentally appropriate;
 - sleeping children must remain within the sight and hearing of staff;
 - sleeping children must be appropriately and regularly checked;
 - children must have access to a clean, safe and suitable place to rest or sleep;
 - parents/carers should be involved where a child has a regular or significant need for sleep or rest;
 - medical, developmental and SEND needs should be considered when making arrangements;
 - staff must use professional judgement and follow the EYFS statutory framework and this policy;
 - sleep and rest arrangements must never compromise the safe supervision of the wider group.
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3. Safer Sleep Requirements

When a child sleeps within the nursery provision, staff must ensure that reasonable and appropriate safer-sleep arrangements are in place.

For children aged 2–5 years, this includes:

- providing a suitable, clean and safe sleeping or resting surface;
- ensuring the child is positioned safely and comfortably;
- removing obvious hazards from the immediate sleep environment;
- ensuring the child remains within the sight and hearing of staff;
- carrying out appropriate regular checks;
- ensuring children are not excessively warm or overdressed;
- ensuring bedding or other materials do not cover the child's face or create an obvious safety risk;
- avoiding unsuitable soft furnishings, such as sofas or beanbags, as routine sleeping surfaces;
- ensuring the environment is appropriately ventilated and comfortable;
- ensuring staffing arrangements allow effective supervision of the sleeping child and the wider group.

The DfE's safer-sleep guidance is intended to reduce risks associated with sleep and applies to babies and children in early years settings. The specific statutory requirement for babies aged 12 months and under to sleep in a cot, carrycot, Moses basket or travel cot does not apply to the 2–5-year-old age range covered by this policy. ([Help for Early Years Providers](#))

4. Arrival and Collection

Children should ordinarily arrive at and leave the nursery awake and responsive, accompanied by their parent/carer or another authorised adult.

This provides an appropriate point for staff and parents/carers to share information about the child's presentation, wellbeing and any relevant concerns.

4.1 Arrival

Children should not routinely be brought into nursery asleep.

If a child arrives asleep:

1. the parent/carer should be asked to gently wake the child before the handover;
2. staff should ensure that the child is awake and responsive;
3. staff should observe the child's presentation and wellbeing;
4. any unusual tiredness, lethargy, illness or difficulty waking should be explored with the parent/carer;
5. where there is a concern about the child's health or wellbeing, the school's relevant illness, safeguarding or emergency procedures should be followed.

If a child is unusually difficult to wake, unresponsive, excessively sleepy or appears unwell, staff must not simply accept the child into nursery and allow them to sleep without further consideration. The appropriate medical, safeguarding or emergency procedure must be followed.

4.2 Collection

Where a child falls asleep shortly before collection, staff should make a reasonable effort to gently wake the child before handover.

Children should not routinely be transferred directly from nursery staff to a parent/carer while asleep.

The child should be awake and responsive at handover where this is safe and appropriate.

Parents/carers should be informed where:

- the child has fallen asleep shortly before collection;
- the child has slept for an unusually long period;
- the child has been unusually tired;
- the child has been difficult to wake;

- the child's sleep pattern has been noticeably different; or
- staff have any concern about the child's health or wellbeing.

Significant or unusual concerns should be recorded in accordance with the school's recording procedures, including on Arbor where appropriate.

5. Planned Sleep and Rest

School-based nurseries will not generally operate a formal daily sleep or nap routine.

However, individual children may have a regular need for rest or sleep. Where this is identified, staff should work in partnership with parents/carers to understand the child's needs.

This should include consideration of:

- the child's usual sleep pattern at home;
- the child's usual waking and sleeping times;
- the length and frequency of naps;
- whether the child is experiencing disrupted sleep;
- changes in the child's circumstances or routine;
- developmental needs;
- SEND;
- medical or health needs;
- emotional wellbeing;
- transition into nursery or school; and
- any other relevant factors.

Where a child has a regular need to sleep or rest during their nursery session, an Individual Sleep and Rest Plan should be considered and completed where appropriate.

The plan should be reviewed regularly and whenever the child's needs change.

6. When a Child Spontaneously Falls Asleep

Children may occasionally fall asleep without this having been planned. This may occur because of:

- tiredness following physical activity;
- a disrupted night's sleep;

- changes to the child's routine;
- emotional or developmental factors;
- illness or recovery from illness;
- transition into a new setting; or
- individual sleep needs.

If a child spontaneously falls asleep, practitioners should:

1. check that the child is safe;
2. assess their position and immediate environment;
3. remove any obvious hazards;
4. move the child to a designated rest/sleep area where this is appropriate and can be done safely;
5. ensure the sleeping surface is suitable;
6. ensure the child remains within sight and hearing of staff;
7. carry out appropriate regular checks;
8. consider whether the child's level of tiredness is unusual;
9. inform parents/carers where appropriate, particularly where the sleep is unusual, prolonged or part of a developing pattern; and
10. record relevant information where required.

A child should not routinely be woken simply because they have fallen asleep.

However, professional judgement should be used. If a child is unusually lethargic, difficult to rouse, appears unwell or there is any concern about their health or wellbeing, staff must follow the school's relevant health, first aid, safeguarding or emergency procedures.

7. Reception Children and Transition to School

Although this policy applies specifically to school-based nursery provision, schools should recognise that some children may occasionally fall asleep or require a short period of rest during their transition into Reception.

This may be particularly relevant during the early weeks of starting school or following:

- disrupted sleep;
- significant changes in routine;
- emotional or physical tiredness;
- illness;
- developmental changes; or
- individual SEND or medical needs.

Reception children should not ordinarily have a scheduled nap as part of the school day.

However, if a Reception child becomes tired or spontaneously falls asleep, staff should respond sensitively and apply the same fundamental safer-sleep principles:

- appropriate and safe environment;
- sight and hearing of staff;
- regular checks;
- appropriate staffing and supervision;
- consideration of the child's wellbeing; and
- communication with parents/carers where appropriate.

Where a Reception child regularly requires sleep or significant periods of rest, this should be discussed with parents/carers and considered as part of the child's individual needs, including whether further assessment, SEND support or medical advice may be appropriate.

8. Rest and Sleep Environment

Where children sleep or rest, the environment should be:

- clean;
- safe;
- appropriately ventilated;
- comfortable in temperature;
- free from obvious hazards;
- appropriately quiet where possible;
- suitable for the child's age and developmental stage; and
- arranged so that staff can see and hear the child.

A separate sleep room is not required.

A designated quiet area, rest area or suitable part of the nursery environment may be used where this has been appropriately risk assessed and allows effective supervision.

Children must not be placed in an isolated area simply to enable staff to maintain ratios elsewhere.

9. Sleep Mats and Mattresses

There is no requirement for school-based nurseries caring for children aged 2–5 years to purchase a particular type of sleep mat solely because of the September 2026 EYFS changes.

Where sleep mats, mattresses or similar equipment are used, they should:

- be suitable for the age and developmental stage of the children;
- be firm and appropriate for the intended use;
- be clean and well maintained;
- be free from damage;
- be stored hygienically; and
- be used in accordance with the manufacturer's instructions.

Sofas, beanbags and other unsuitable soft furnishings should not be used as routine sleeping surfaces.

10. Sleeping on the Carpet

A child may occasionally fall asleep on the carpet during free-flow play, continuous provision or another part of the nursery session.

Staff should assess the situation rather than automatically waking the child.

If the carpet is not considered an appropriate place for the child to remain asleep, staff should, where safe and appropriate, move the child to the designated rest/sleep area.

Where a child remains asleep temporarily on the carpet, they must remain within the sight and hearing of staff and be appropriately monitored.

Repeatedly falling asleep on the carpet may indicate that the child's sleep needs should be discussed with parents/carers and considered as part of an Individual Sleep and Rest Plan.

11. Sleeping Clothing and Bedding

Children should be appropriately dressed for the temperature and environment.

Practitioners should:

- avoid overheating;
- consider the child's clothing and additional layers;
- avoid outdoor coats, hats and excessive layers being worn while sleeping indoors;
- use lightweight and appropriate bedding where required;
- ensure bedding does not cover the child's face or head;
- avoid unnecessary items being placed around the sleeping child; and

- take account of any individual medical or sensory needs.

Where a child regularly sleeps, their clothing, bedding and comfort needs should be discussed with parents/carers.

12. Supervision, Staffing and Ratios

The statutory EYFS staffing ratios apply at all times.

There is not a separate statutory staff-to-child ratio specifically for sleep periods. However, staffing arrangements must allow staff to effectively supervise sleeping children while also maintaining safe supervision of the wider group.

When considering sleep arrangements, leaders should take account of:

- the number and ages of children present;
- the number of children sleeping;
- where the child is sleeping;
- whether the child can be seen and heard;
- the number and deployment of staff;
- the needs of other children;
- any SEND or medical needs;
- safeguarding considerations;
- the layout of the provision; and
- how staff will respond immediately if a child needs assistance.

A sleeping child must not be placed in an area where effective supervision cannot be maintained.

If staffing arrangements do not allow a child to sleep safely while the wider group is supervised, an alternative arrangement must be made.

Where several children regularly require sleep or rest, leaders should consider this as part of workforce planning and risk assessment.

13. Waking a Child

Children should not routinely be woken simply because they have fallen asleep.

There may, however, be circumstances where waking a child is appropriate, including where:

- the child has slept for an unusually long period;
- there is a concern about the child's health or wellbeing;
- medication or an individual medical arrangement requires the child to be awake;
- the child's sleep is affecting their safe participation in the provision;
- the child's agreed Individual Sleep and Rest Plan identifies a waking arrangement;
- the child needs to leave the provision; or
- staff need to establish that the child is awake and responsive before handover.

Where a child needs to be woken, staff should do so calmly and sensitively.

14. Dummies, Comforters and Transitional Objects

Dummies, comforters and transitional objects can provide reassurance, emotional security and support during periods of settling, transition or tiredness.

Schools should follow their existing policy and procedures regarding their use.

Where a child uses a dummy or comforter:

- the child's individual needs should be considered;
- parents/carers should be consulted where use is regular or significant;
- the item should be clean and appropriately maintained;
- the item must not obstruct the child's face or breathing;
- it must not be attached to the child or their clothing in a way that creates a strangulation or entanglement risk;
- it should not create an obvious safety risk within the sleep environment; and
- individual arrangements should be reviewed where the child's needs change.

If a dummy, comforter or transitional object creates a safety concern while a child is sleeping, staff should take appropriate action to remove or reposition it safely and sensitively.

Where there is uncertainty about the safe use of a particular item, staff should seek advice from the nursery leader/DSL and consider the manufacturer's guidance and relevant DfE safer-sleep guidance.

15. Parent and Carer Communication and Recording

Parents/carers are important partners in understanding a child's sleep and rest needs.

Parents/carers should be informed and involved where there is:

- a regular need for sleep or rest;
- repeated spontaneous sleeping;
- an unusually long sleep;
- unusual or excessive tiredness;
- difficulty waking;
- a significant change in sleep pattern;
- a concern about the child's health or wellbeing;
- a regular need for a dummy or comforter during sleep;
- a planned Individual Sleep and Rest Plan;
- a child arriving asleep;
- a child falling asleep immediately before collection; or
- any other matter that staff consider significant.

Communication should not rely solely on written messages where a conversation would be more appropriate.

Where relevant, staff should discuss the matter directly with the parent/carer and use Arbor to record significant information and communication in accordance with school procedures.

Records should be:

- factual;
- objective;
- proportionate;
- clear;
- dated;
- attributable to the member of staff making the record; and
- clear about whether information is a parent/carer report, staff observation or professional judgement.

Not every spontaneous sleep requires a formal parental signature or individual plan.

A Parent/Carer Sleep and Rest Discussion Record should be used where there has been a significant discussion, concern, repeated occurrence or agreed change in practice.

An Individual Sleep and Rest Plan should be used where an ongoing or regular arrangement is required.

16. Individual Needs, SEND and Medical Conditions

Some children may have sleep or rest needs associated with:

- SEND;
- developmental differences;
- sensory needs;
- medical conditions;
- medication;
- physical or emotional wellbeing;
- changes at home;
- trauma or significant life events; or
- other individual circumstances.

Where relevant, information should be gathered from parents/carers and, where appropriate, relevant professionals.

Any specific arrangements should be risk assessed and clearly communicated to all staff who may care for the child.

Where medical advice or a healthcare plan is required, this should be incorporated into the child's existing school procedures.

17. Risk Assessment

Sleep and rest arrangements should form part of the nursery's wider risk assessment arrangements.

An individual risk assessment should be considered where a child:

- regularly sleeps during nursery sessions;
- requires a specific sleep or rest arrangement;
- has a medical condition;
- has SEND that affects sleep or supervision;
- uses a particular item for comfort;
- requires staff to respond in a specific way;
- presents an increased risk while sleeping; or
- has an unusual pattern of sleep or tiredness.

Risk assessments should consider:

- the sleeping environment;
- the suitability of the sleep surface;
- the child's position;
- temperature and ventilation;
- bedding and clothing;
- dummies and comforters;
- staffing;
- sight and hearing;
- regular checks;
- supervision of the wider group;
- arrival and collection arrangements;
- waking arrangements;
- emergency procedures; and
- any individual health, SEND or safeguarding considerations.

Risk assessments should be reviewed whenever circumstances change.

18. Staff Responsibilities

All staff working within school-based nursery provision are responsible for understanding and implementing this policy.

Practitioners should:

- understand safer-sleep expectations;
- know where children may safely rest or sleep;
- maintain effective supervision;
- carry out appropriate checks;
- identify and respond to concerns;
- communicate appropriately with parents/carers;
- follow individual plans and risk assessments;
- record significant information appropriately;
- use professional judgement; and
- raise concerns with the nursery leader or DSL.

Nursery leaders are responsible for ensuring:

- staff understand the policy;
- staff receive appropriate information and training;
- sleep environments are suitable;
- risk assessments are completed where required;
- staffing arrangements allow effective supervision;
- individual plans are reviewed; and

- parents/carers are appropriately involved.
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19. Safeguarding

Sleep and rest are part of children's health, safety and wellbeing and must therefore be considered within the school's safeguarding arrangements.

Staff should raise concerns where they identify:

- unsafe sleep practices;
- inadequate supervision;
- unsuitable equipment or sleeping environments;
- repeated concerns about a child's level of tiredness;
- a child who is unusually difficult to wake;
- a concerning or unexplained change in a child's presentation or sleep pattern;
- concerns relating to a child's care at home;
- unsafe use of dummies, comforters or other items;
- unsafe staff practice; or
- any other concern about a child's welfare.

All safeguarding concerns must be reported in accordance with the school's Safeguarding and Child Protection Policy.

20. Monitoring and Review

The implementation of this policy should be monitored through:

- staff discussions;
- supervision;
- observations of practice;
- environmental checks;
- risk assessments;
- review of individual sleep and rest plans;
- review of significant sleep/rest records;
- parent/carer feedback;
- safeguarding monitoring; and
- leadership oversight.

The nursery leader should ensure that arrangements remain effective and that staff understand any changes.

The headteacher and relevant executive leader should also review implementation as appropriate.

This policy will be formally reviewed annually, or sooner if there are significant changes to statutory guidance, safeguarding requirements or DfE safer-sleep guidance.

Appendix 1 – Quick Guide for Practitioners

If a child falls asleep:

STOP

Stop and consider why the child may have fallen asleep.

CHECK

Check the child's position, environment and immediate safety.

ASSESS

Consider:

- Is the child well?
- Are they appropriately positioned?
- Is the sleep surface suitable?
- Are they too warm?
- Are there any hazards?
- Can staff see and hear them?
- Can the wider group still be safely supervised?

RESPOND

Where appropriate:

- move the child to the designated rest area;
- remove obvious hazards;
- adjust clothing/bedding;
- ensure effective supervision.

MONITOR

Remain within sight and hearing and carry out appropriate regular checks.

RECORD

Record relevant information where required.

COMMUNICATE

Tell parents/carers where the sleep is unusual, prolonged, repeated or raises a concern.

Remember: If a child is unusually lethargic, difficult to rouse or appears unwell, follow the school's health, first aid, safeguarding or emergency procedures.

Appendix 2 – Arrival and Collection Quick Reminder

ARRIVAL

Children should arrive awake and responsive.

If a child arrives asleep:

- ask the parent/carers to gently wake them;
- observe the child's presentation;
- ensure they are awake and responsive;
- discuss any unusual tiredness;
- follow health/safeguarding procedures if there is concern.

If the child is difficult to wake or appears unwell, do not simply accept them into nursery and allow them to sleep.

COLLECTION

If a child falls asleep shortly before collection:

- make a reasonable effort to wake them gently;
- ensure they are awake and responsive where safe and appropriate;
- tell the parent/carers that they fell asleep;
- explain any concerns or unusual presentation;
- record significant concerns appropriately.

Children should not routinely be transferred directly from nursery staff to a parent/carers while asleep.

Appendix 3 – Dummies and Comforters Quick Guide

Dummies

- Follow the school's existing policy.
- Consider the child's individual need.
- Discuss regular use with parents/carers.
- Ensure the dummy is clean and safe.
- Never attach a dummy to clothing or the child in a way that could create a strangulation or entanglement risk.
- Ensure it does not obstruct the child's face or breathing.

Comforters and transitional objects

- Recognise their potential role in emotional security.
- Follow individual arrangements where appropriate.
- Keep items clean and safe.
- Ensure they do not cover the child's face.
- Do not allow items to create an obvious sleep safety risk.
- Discuss repeated or significant use with parents/carers.

Where an item creates a safety concern, staff should take appropriate action to remove or reposition it safely and sensitively.

Appendix 4 – Individual Sleep and Rest Plan

Child Details

Child's name: _____

Date of birth: _____

School/Nursery: _____

Class/Key person: _____

Date plan completed: _____

Review date: _____

1. Usual Sleep and Rest Pattern

Usual bedtime: _____

Usual waking time: _____

Does the child usually nap?

☐ Yes

☐ No

☐ Occasionally

If yes, when? _____

Typical length of sleep/rest: _____

Information shared by parent/carer:

2. Reason for Sleep/Rest Arrangement

Please tick as appropriate:

☐ Developmental need

☐ Transition/settling

☐ Disrupted sleep

☐ SEND

☐ Medical/health need

☐ Emotional wellbeing

☐ Unusual tiredness

☐ Other

Details:

Signs that the child is becoming tired:

3. Agreed Rest Arrangements

Preferred time/period: _____

Preferred location: _____

Expected duration: _____

How will the child be supported to settle?

Does the child use a comforter?

☐ Yes ☐ No

Does the child use a dummy?

☐ Yes ☐ No

Details/arrangements:

4. Safer Sleep and Supervision

- ☐ Suitable sleep/rest surface identified
- ☐ Area is free from obvious hazards
- ☐ Child remains within sight and hearing of staff
- ☐ Appropriate regular checks identified
- ☐ Clothing/bedding considered
- ☐ Temperature/ventilation considered
- ☐ Wider group can remain safely supervised
- ☐ Staffing arrangements are appropriate
- ☐ Risk assessment completed/updated where required
- ☐ Medical/SEND considerations addressed

Additional actions or controls:

5. Waking and Collection

Agreed approach to waking the child:

Is there an agreed maximum/expected sleep period?

Any individual arrangements for collection?

The general expectation is that the child will be awake and responsive at handover wherever safe and appropriate.

6. Communication

Parents/carers will inform nursery of significant changes to the child's sleep pattern.

Nursery will communicate relevant information to parents/carers.

Communication method(s):

☐ Face-to-face

☐ Telephone

☐ Arbor

☐ Other: _____

7. Agreement and Review

Parent/carer name: _____

Parent/carer signature: _____

Date: _____

Staff member: _____

Signature: _____

Date: _____

Nursery leader: _____

Signature: _____

Date: _____

Review

Is the plan still appropriate?

☐ Yes ☐ No

Changes required:

Parent/carers informed of review:

☐ Yes ☐ No

Recorded on Arbor:

☐ Yes ☐ No

All records should be stored and retained in accordance with the school's data protection and record-management procedures.

Appendix 5 – Parent/Carer Sleep and Rest Discussion Record

Child Details

Child's name: _____

Date of birth: _____

Date of discussion: _____

Parent/carers: _____

Staff member: _____

Reason for Discussion

- ☐ Regularly falling asleep
- ☐ Unusually long sleep
- ☐ Increased tiredness
- ☐ Difficulty waking
- ☐ Change in sleep pattern
- ☐ Individual Sleep and Rest Plan required
- ☐ Child arrived asleep
- ☐ Child fell asleep immediately before collection
- ☐ SEND/developmental need
- ☐ Medical/health consideration
- ☐ Dummy/comforter arrangement
- ☐ Other

Information Shared by Parent/Carer

Staff Observations

Date/time of sleep or rest: _____

Approximate duration: _____

Presentation before sleep: _____

Presentation after waking: _____

Any concerns:

Agreed Actions

Further Action Required?

Individual Sleep and Rest Plan required:

☐ Yes ☐ No

Risk assessment required/updated:

☐ Yes ☐ No

Medical advice/professional involvement required:

☐ Yes ☐ No

Further parent/carers discussion required:

☐ Yes ☐ No

Review date: _____

Communication

Method used:

☐ Face-to-face

☐ Telephone

☐ Arbor

☐ Other: _____

Parent/carers confirmation:

I confirm that the above discussion has taken place and that the agreed arrangements have been discussed with me.

Parent/carers name: _____

Signature: _____

Date: _____

Staff member: _____

Signature: _____

Date: _____

Recorded on Arbor:

☐ Yes ☐ No

Practitioner reminder

Not every spontaneous sleep requires a formal plan or parental signature.

Use this record where there has been a significant discussion, concern, repeated occurrence or agreed change in practice.

Use an Individual Sleep and Rest Plan where an ongoing or regular arrangement is required.

Records should remain factual, proportionate and objective.

Appendix 6 – Useful DfE Guidance and References

EYFS Statutory Framework

Early Years Foundation Stage (EYFS) Statutory Framework for Group and School-Based Providers – applies from 1 September 2026

[EYFS Statutory Framework – GOV.UK](#)

The current framework sets the statutory standards that group and school-based early years providers must meet to ensure children learn and develop well and are kept healthy and safe.

DfE Safer Sleep Guidance

[DfE Safer Sleep Guidance](#)

This guidance was produced by the Department for Education in collaboration with The Lullaby Trust and supports implementation of the safer-sleep requirements applying from September 2026. ([Help for Early Years Providers](#))

Changes to the EYFS Framework from 1 September 2026

[DfE – Changes to the EYFS Framework from 1 September 2026](#)

The DfE confirms that the updated EYFS frameworks bring explicit safer-sleep wording into the main body of the EYFS statutory framework from 1 September 2026. ([Help for Early Years Providers](#))

Related School Policies

This policy should also be read alongside the school's:

- Safeguarding and Child Protection Policy;
- Health and Safety Policy;
- First Aid Policy;
- Administration of Medicines Policy;
- SEND Policy;
- Attendance Policy;
- Intimate Care Policy;
- Educational Visits/Off-Site Activities Policy, where relevant;
- Dummies/Comforters or Transitional Objects Policy, where applicable; and
- relevant risk assessments.

Policy Review

Policy owner: Sherise Daly – Trust Early Years Lead

Effective from: 1 September 2026

Review date: September 2027

This policy will be reviewed annually and sooner where there are changes to statutory requirements, DfE guidance, safeguarding expectations or Trust practice.