

# CHILD PROTECTION AND SAFEGUARDING POLICY

This policy was reviewed:

Date: 1st September 2025

By: Shannon Ramsey (Designated Safeguarding Lead)

Policy will be reviewed on: 1st September 2026

Frequency of review: Every 1 year(s) or sooner if government legislation changes

This policy is available on our website and is available on request from the office. We also inform parents and carers about this policy when their children join.

The policy is provided to all staff (including temporary staff) at induction alongside our

Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance Keeping Children Safe in Education 2025.

# 1 Key Safeguarding Contacts

Role in Service	Name	Date and Level of safeguarding training
Director of Education	Coren Murley	Level 3 30 <sup>th</sup> November 2023
Designated Safeguarding Lead (DSL)	Shannon Ramsey	Level 4 6 <sup>th</sup> February 2025
Deputy Designated Safeguarding Lead (DDSL)	Coren Murley	Level 3 30 <sup>th</sup> November 2023
Deputy Designated Safeguarding Lead (DDSL)	Nicola Brown	Level 3 25 <sup>th</sup> July 2024
Designated teacher for Looked After Children	Coren Murley	Level 3 30 <sup>th</sup> November 2023

# 2 Purpose and Aims

The purpose of our Safeguarding policy at  $1^{st}$  Staff is to ensure that we:

- Are committed to developing a robust safeguarding culture of vigilance and challenge.
- Build resilience by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- Establish a safe environment in which children and young people can learn, develop and engage in personalised education programmes tailored to their needs within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- Support vulnerable pupils who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- Prevent unsuitable people from working with children by ensuring we practise safe recruitment in checking the suitability of all staff, supply staff and volunteers to work with our children and maintain an active, ongoing vigilance in line with the safeguarding culture.

Our aim is to follow the procedures set out by <u>Working Together to Safeguard Children</u> 2023 and <u>Keeping Children Safe in Education 2025</u> by knowing and understanding that:

- Safeguarding and promoting the welfare of children is everyone's responsibility and the voice of the child is evident.
- Everyone who comes into contact with children and their families has a role to play.
- Everyone should ensure that their approach is child-centred considering, at all times, what is in the best interests of the child.
- By establishing a safe environment, we enable our children to learn and develop within an ethos of openness.
- No single practitioner can have the full picture of a child's needs and circumstances.
- If children and families are to receive the right help at the right time, everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information, and taking prompt action.
- The importance of providing children with a broad personal development curriculum including PSHE, healthy relationships education, online safety, sexting, child-on-child abuse as well as 'abuse outside the home' county Lines, contextualised safeguarding issues, and Child Criminal Exploitation (incl CSE). Also supporting this with online activities, enabling children to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Undertaking the role to enable children and young people to have best outcomes.
- Ensuring that we have awareness of our staff's knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our practice.

#### At 1<sup>st</sup> Staff we strive to:

- Protect children from maltreatment.
- Prevent impairment of our children's mental and physical health or development.
- Ensure that our children grow up in circumstances consistent with the provisions of safe and effective care.
- Take action to enable ALL children to have the best outcomes.

This policy provides guidance to all adults working within the service, whether paid or voluntary or directly employed by 1<sup>st</sup> Staff or a third party and should be read in conjunction with the documents <u>Keeping Children Safe in Education 2025</u> and <u>Working Together to Safeguard Children 2023</u>.

## **3** Our Ethos and Culture

At 1st Staff, The welfare of our learners is of paramount importance to us, and we are learner centred. Our children are reassured that they have a voice, will be listened to and what they say will be taken seriously. They know that they will be supported and kept safe. They will never be given the impression that they are creating a problem by reporting abuse.

Children are encouraged to talk freely with staff if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never feel ashamed for making a report. Their views and wishes will inform any assessment and provision for them.

We make every effort to listen to and capture the voice of children to enable us to have a clear understanding of their daily lived experiences.

We are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated, or being threatened. This could be due to vulnerability, disability and/or sexual orientation or language barriers.

This does not prevent ALL staff from having professional curiosity and speaking to the DSL if they have concerns about a child and our staff determine how best to build trusted relationships with children which facilitate this communication.

We understand our statutory duty to safeguard and promote the welfare of children and we maintain a professional attitude of '<u>it could happen here</u>' where safeguarding is concerned. We expect ALL staff and visitors to share our commitment, maintaining a safe environment and a culture of vigilance.

Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours, that underpins this commitment. We work in partnership with commissioning local authorities, families, and other agencies to improve the outcomes for children who are vulnerable or in need.

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours and these are dealt with appropriately and robustly. Staff do not accept these behaviours as 'banter' 'having a laugh' or 'part of growing up'.

All staff are encouraged to report any concerns that they have and not to see these as insignificant. On occasions, a referral is justified by a single incident, such as an injury or disclosure of abuse. However, concerns can accumulate over time and are evidenced by building a picture of harm, particularly true in cases of abuse or neglect.

We know that it is crucial that our staff record and pass on any concerns in a timely manner and in accordance with this policy, to allow the DSL/DDSLs to build up a picture and access

support at the earliest opportunity.

When dealing with safeguarding matters, we are conscious of the language and terminology that we use, especially in front of children. Sometimes reference is made to a child who has been subjected to abuse as a victim. However, not all children will consider themselves a victim nor will they want to be referred to in this way. We are conscious of this and when managing any incident, we will be prepared to use terminology that children are most comfortable with.

In guidance we will also at times use the term 'alleged perpetrator' and where appropriate 'perpetrator' and we know that these are widely used terms. However, we know that in some cases the abusive behaviour will have been harmful to the perpetrator as well and again we will be mindful of appropriate language and will decide appropriateness on a case-by-case basis.

We work closely and restoratively with our safeguarding partners with the confidence to challenge decisions and practice if deemed appropriate.

We are committed to working with parents in a positive, open, and transparent way. We ensure that all parents are treated with respect, dignity, and courtesy.

We recognise the stressful and traumatic nature of safeguarding and child protection work and support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate.

# 4 Legislation, Guidance and Links to Other Policies

This policy has been devised with due regard for the statutory guidance from the DfE Keeping Children Safe in Education 2025 (KCSiE) and this document is read alongside;

- Working Together to Safeguard Children 2023
- What to do if you are Worried a Child is being Abused-Advice for Practitioners
- Behaviour in Schools Advice for headteachers and school staff

## 5 The Role of All Staff in Keeping Children Safe

All staff have read and have a good understanding of at least part 1 of <u>Keeping Children</u> <u>Safe in Education 2025</u> and are aware of the safeguarding link to other policies relating to their daily practice.

All staff receive appropriate safeguarding training (including online safety, FGM, Prevent duty and Child Protection) at induction and this training is regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates as required, and at least annually, to continue to provide our staff with relevant skills and

knowledge to safeguard children effectively.

All staff know who the DSL/DDSLs are, and as well as being the expert in this field, are there to support staff and volunteers.

All staff are aware of their responsibility to provide a safe environment in which learners can learn, develop, and engage positively with education.

All staff are aware of indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the provision, inside and outside of their home environment and online. Staff are confident in exercising professional curiosity and understand that knowing what to look for is vital for the early identification of abuse and neglect to identify cases of children who may need our help or protection. They are aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff, but especially the DSL/DDSLs consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

All staff know what to do if a child tells them they are being abused, exploited, or neglected. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL and local authority children's social care. Staff never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child

All staff know how to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

All staff are aware of the early help process and understand their role in it and are confident to identify and support children who may benefit from early help, effectively giving children and their families the right help at the right time.

All staff are aware of how to make a referral to children's social care, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with their potential role in such assessments.

All staff understand their responsibility to report concerns about the behaviour of any adult

in our organisation and know that they will be listened to and taken seriously.

All staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm.

In all cases, if our staff are unsure, they know that they should always speak to the DSL/DDSL.

# 6 Roles and Responsibilities of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

For full details of the DSL/DDSL roles and responsibilities please refer to Part 2 & Annex C of Keeping children safe in education 2025.

Our DSL is Shannon Ramsey. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during working hours (08:30am – 16:30) for staff to discuss any safeguarding concerns. Any concerns can be raised outside these hours by email to <a href="mailto:shannon@1ststaff.co.uk">shannon@1ststaff.co.uk</a>.

When the DSL is absent, the Deputy DSLs, <u>Coren Murley</u> and <u>Nicola Brown</u>, will act as cover.

The DSL and Deputy will be given the time, funding, training, resources, and support to:

- Provide advice and support to other staff on child welfare and child protection matters. Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL and/or Deputy will also keep the Head of Education informed of any issues and liaise with the commissioning local authority, case managers, and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL are set out in their job description.

Our DSL/DDSL(s) have received the appropriate safeguarding training to provide them with an understanding of their role and the knowledge and skills to carry it out. Our DDSL(s) are trained to a level 3 and supported by the DSL.

Training received also supports their knowledge of the processes, procedures, and responsibilities of other agencies, particularly children's social care in line with <u>Working Together to Safeguard Children 2023</u>. This training is updated at least every 2 years and in addition to this they regularly (at least annually) refresh and update their knowledge and skills. The DSL is given additional time, funding, training, resources, and support needed to

carry out the role effectively.

Our DSL takes the lead responsibility for safeguarding and child protection (including online safety), and this is explicit in their job description. During term time, the DSL/DDSL is available (during working hours) for staff to discuss any safeguarding concerns. The DSL can delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated. In the absence of the DSL the DDSL(s) will take a lead on safeguarding with clear direction from the Senior Leadership Team.

The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly and shared appropriately.

Our DSL maintains robust systems to monitor and record training of all staff and update and refresher time scales are evident within the training record. Training is delivered in-line with KCSIE 2025. This will include bulletins, briefings, and inset day training as well as external events attended.

The DSL ensures that all staff and regular visitors have appropriate safeguarding training to equip them for their role. This includes training on how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information accurately. The DSL ensures systems are in place to induct new staff and these are robust and monitored and any non-compliance shared with Senior Leadership Team.

The DSL monitors the electronic/paper case management systems to record concerns about children, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the <u>Data Protection Act 2018</u> and <u>General Data Protection Regulation (UK GDPR)</u>. The safeguarding and child protection records are kept securely and separately from educational records and there is a clear recording process of transfer, in or out, which if paper file transfer, using the transfer of records form which is signed by the sending and receiving settings and a copy of this form kept by both.

The DSL/DDSLs monitors the quality of safeguarding files through auditing case files regularly. Appropriate and regular supervision takes place with the DSL and may be extended to other members of staff if we deem this appropriate.

The DSL/DDSLs will refer cases of suspected abuse to the local authority children's social care, as required, and support other staff to make these referrals. We understand the importance of attending case conferences and core group meetings as well as Child in Need meetings.

DSL will liaise with all staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

The DSL/DDSLs will attend child protection conferences and core group meetings as necessary and will be the expert within our setting to support staff in liaising with other agencies, making assessments and any referrals. Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of child/ren. The DSL/DDSLs will notify children's social care if a child with a child protection plan is absent for more than two days without explanation.

The DSL/DDSLs helps to promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and senior leadership staff. Their role could include ensuring that the staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for them; supporting tutors, mentors, and other staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

## 7 The Designated Teacher

1<sup>st</sup> Staff have appointed a Designated Teacher (DT) who works with the local authority to promote the educational achievement of learners placed in our provision in our setting, who are looked after. Our Designated Teacher works to promote and improve educational outcomes for children in care using evidence-based interventions.

Our designated teachers also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care, outside of England and Wales. They are appropriately trained and have the relevant qualifications and experience.

The Designated Teacher works closely with the Virtual School to provide the most appropriate support, utilising Pupil Premium Plus funding, to ensure that they meet the needs identified in the child's personal education plan (PEP). They work with the Virtual School Headteacher, to promote the educational achievement of previously looked after children.

The Designated Teacher has the details of the Local Authority Personal Advisor who has been appointed to guide and support the care leaver and liaises as necessary regarding any issues of concern affecting the care leaver.

At  $1^{st}$  Staff we are attachment aware, and trauma informed and take a relational based approach to supporting our most vulnerable children and will work restoratively with children to improve their outcomes.

We are aware of the additional duties of the virtual school headteacher extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We understand the role that we play in improving outcomes for children with a social worker.

Virtual Headteacher Role-Children with a social worker

# 8 Working with Parents/Carers

At 1<sup>st</sup> Staff we are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory

responsibilities in this area.

When a learner is placed with us, parents/carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on our website and through direct communication with commissioning local authorities and parents/carers. Parents/carers will be informed of our legal duty to assist our safeguarding colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm.

We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the service has about a child will not prevent the DSL from making a referral to the local authority in those circumstances and where it is appropriate to do so.

To keep children safe and provide appropriate care for them, we require parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and at least 2 contacts.
- Any legal or criminal changes which effects parental responsibility e.g., bail conditions, court orders, Special Guardianship orders, Child arrangement orders etc

We will retain this information on the pupil file. We will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission, and we have been supplied with the adult's full details in writing.

We recognise that we are likely to be in regular contact with parents and carers. We will use these communications to reinforce the importance of children being safe online. It will be especially important for parents/carers to be aware of what their children are being asked to do online, including the sites they will ask to access and be clear who from the company (if anyone) their child is going to be interacting with online.

At 1<sup>st</sup> Staff we update parents about safeguarding through our website.

1st Staff follows the SET (Southend, Essex and Thurrock) Child Protection Procedures in all safeguarding matters. Staff should refer to the Effective Support for Children and Families in Essex document for thresholds of need and guidance on appropriate responses.

#### **Key Contacts:**

- Essex Children's Social Care: 0345 603 7627
- Essex LADO: 03330 139 797 | lado@essex.gov.uk
- Emergency Duty Team (Out of Hours): 0345 606 1212

# 9 What Happens if a Referral is Deemed Necessary

#### Child in Need (Section 17)

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents/child and obtain their consent for referral to the appropriate social care team, to request an assessment. If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss these issues with the first response team at the relevant local authority. Appropriate staff will attend Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require Section 17 services.

#### **Child Protection (Section 47)**

If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they make enquiries under Section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also applies if a child is subject to an emergency protection order (under S44 of the Children Act 1989) or in police protective custody (under S46 of the Children Act 1989).

Children's Services will convene an Initial Child Protection Conference (ICPC) once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken, and the child is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan.

The DSL/DDSL (sometimes other staff members) will attend the child protection conference on behalf of the service. The person attending will have as much relevant and up to date information about the child as possible. They will contribute to a recommendation on the risks/protective factors for the family from their information and a view on the need for a child protection plan. We understand the importance of our attendance and contribution at these conferences and whether we attend or not we know that there is a requirement to complete a report containing these contributions.

Child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved and will work in an open, honest, and transparent way with any parent whose child has been referred to children's services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children, and our aim is to achieve this in partnership with our parents/carers, wherever possible.

### Recognising abuse and taking action.

Staff must follow the procedures set out below in the event of a safeguarding issue.

Make a referral to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm. Anyone can make a referral.

Tell the DSL as soon as possible if you make a referral directly.

The DSL or deputy DSL will complete a Referral Form and escalate this to the duty social care team within 24 hours, staff can make referrals to social care as outlined in the table below:

Area	How to report a concern
Barking and Dagenham	Concerned about a child LBBD
Bedfordshire	Concerned about a child Bedfordshire
Bolton	Concerned about a child Bolton
Bournemouth	Concerned about a child Bournemouth
Cambridge	Concerned about a child Cambridge
Camden	Concerned about a child Camden
Cheshire East	Concerned about a child Cheshire East
Derby	Concerned about a child Derby
Doncaster	Concerned about a child Doncaster
Dorset	Concerned about a child Dorset
Essex	Concerned about a child Essex
Hackney	Concerned about a child Hackney
Hammersmith and Fulham	Concerned about a child Hammersmith and Fulham
Havering	Concerned about a child Havering
Hertfordshire	Concerned about a child Hertfordshire
Isle of Wight	Concerned about a child Isle of Wight
Islington	Concerned about a child Islington
Lancashire	Concerned about a child Lancashire
Manchester	Concerned about a child Manchester

Medway	Concerned about a child Medway
Newcastle	Concerned about a child Newcastle
Norfolk	Concerned about a child Norfolk
North Tyneside	Concerned about a child North Tyneside
Nottingham	Concerned about a child Nottingham
Oxford	Concerned about a child Oxford
Reading	Concerned about a child Reading
Redbridge	Concerned about a child Redbridge
Rochdale	Concerned about a child Rochdale
Southend	Concerned about a child Southend
Southwark	Concerned about a child Southwark
Stafford	Concerned about a child Stafford
Stockport	Concerned about a child Stockport
Stockton	Concerned about a child Stockton
Stoke	Concerned about a child Stoke
Suffolk	Concerned about a child Suffolk
Trafford	Concerned about a child Trafford
Waltham Forest	Concerned about a child Waltham Forest
Wolverhampton	Concerned about a child Wolverhampton

## 10 A Safer Culture

#### Safer Recruitment and Selection

All pre-appointment checks are documented and recorded centrally on the Single Central Record (SCR), which is maintained by the Designated Safeguarding Lead and overseen by the Head of Education. The SCR is reviewed and updated following each recruitment round and audited termly to ensure compliance.

At 1<sup>st</sup> Staff we pay full regard to 'Keeping Children Safe in Education 2025. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking academic or vocational qualifications, obtaining professional and character references. Referees will be explicitly asked to provide their informed opinion on the

applicant's suitability to work with children, addressing any relevant factors that may impact their ability to provide a safe and positive environment. Checking previous employment history by rigorously verifying the employment history of all applicants. This process involves obtaining two references that provide insight into the applicant's performance and conduct over the last two years. A reference from the most recent employer is essential. Character references will only be considered in exceptional circumstances, such as for individuals transitioning directly from education, and will be subject to thorough scrutiny.

Ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks, prohibition checks whether they are known to the police and/or social care, if they have been disqualified from providing childcare and any relevant overseas information. Evidence of these checks is recorded on our Single Central Record. Please see appendix 2 for our procedures.

Staff who have lived or worked outside the UK will undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Guidance: Application process for criminal records checks overseas

Regulated professions database

**UK Centre for Professional Qualifications** 

Separate barred list checks are only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 have been carried out); or,
- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as above have been carried out).

All recruitment materials will include reference to our commitment to safeguarding and promoting the wellbeing of pupils.

Relevant staff have undertaken appropriate training in Safer Recruitment.

One of the trained safer recruitment staff will be involved in all staff and volunteer recruitment processes and sit on the recruitment panel. A member of the Senior Leadership

Team or Directors has received Safer Recruitment training.

#### Induction

All staff will be made aware of the systems we have in place to support safeguarding. These are explained as part of staff induction including:

- Safeguarding policy.
- Safer internet usage policy.
- Behaviour policy.
- Staff code of conduct.
- The safeguarding response to children who are absent from education; and
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2025.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

## 11 Use of Reasonable Force

This policy is informed by the Department for Education's consultation on the revised 'Use of reasonable force and other restrictive interventions in schools' guidance (2024).

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the learning environment.

When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

By planning positive and proactive behaviour support, for instance by drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force.

# 12 Keeping Children Safe in Education 2025-Specific Safeguarding Issues

This policy has been updated to reflect the statutory guidance changes introduced in Keeping Children Safe in Education 2025. All staff are expected to be aware of these updates and understand how they apply in our alternative provision setting. Key changes include strengthened expectations around online safety (including misinformation, disinformation, and use of generative AI), statutory requirements for attendance monitoring and reporting, clarified safeguarding responsibilities when learners attend alternative provision, an expanded role for Virtual School Heads to include children in kinship care, updated terminology in line with the SEND Code of Practice, and signposting to forthcoming RSHE and gender-questioning children guidance. Staff must ensure their practice aligns with these updates and seek clarification from the DSL or a Director if they are unsure about any aspect.

Online Safety – Expanded Definitions: KCSiE now explicitly includes misinformation, disinformation (fake news), and conspiracy theories as online safeguarding risks, broadening the "Content" strand of the four Cs framework

- Alternative Provision (AP) Safeguarding Clarified
- Attendance: Elevated to Statutory Importance The "Working Together to Improve School Attendance" (2024) guidance is now statutory.
- Virtual School Heads (VSHs) Expanded Role VSHs now have a non-statutory responsibility to promote the educational outcomes of children in kinship care, in addition to previously looked-after children.
- Language and Framework Alignment The terms "autism spectrum disorder" have been replaced with "autism" to align with the SEND Code of Practice.
   Clarification of statutory expectancies in safer recruitment and signposting to updated roles and resources.
- Emerging Guidance: RSHE and Gender-Questioning Children

#### Clarifications in 'Part One' (Staff Responsibilities)

- Stronger emphasis that safeguarding is everyone's responsibility, with additional examples of how non-teaching staff can contribute.
- More explicit wording around what to do if a child is at immediate risk (straight to police or children's social care, not just DSL).

#### **Terminology Consistency**

- "Children" remains the legal term, but "child/ren" and "young people" are used in context-specific ways — worth mirroring in AP policies so older learners are recognised.
- Minor rewording for clarity in definitions of abuse, neglect, and significant harm.

#### Safer Recruitment

- Reaffirms online searches for shortlisted candidates are now standard practice and should be recorded in recruitment files.
- Additional clarity on agency staff vetting you must see and record evidence, not just take the agency's word.

#### Filtering & Monitoring

- Links to new DfE Filtering & Monitoring Standards and "Plan technology for your school" audit tool.
- APs expected to record annual reviews in writing, showing changes made as a result.

#### Use of External Providers

 For work experience, guest speakers, and AP placements, there's stronger language on due diligence and risk assessment.

#### **Vulnerable Groups**

- Slightly expanded examples of vulnerabilities, e.g. learners with family members in prison or those facing homelessness.
- Reminder to consider cumulative risk factors, not just isolated incidents.

#### Children Who Are Absent from Education

- Cross-references to new statutory attendance guidance.
- More examples of when absence should trigger safeguarding action, even if explained.

#### Annex B and C

- Annex B updated to match Working Together 2023 definitions and guidance.
- Annex C updated role descriptions for the DSL, particularly around data management and case supervision.

#### Specific Safeguarding Issues we should be aware of:

All staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make children vulnerable and put them in danger and that often these issues overlap. Please read and refer to Appendix 1 for additional information and guidance on the below topics.

- Abuse (incl Physical/Emotional/Sexual/Neglect/online/witness to domestic violence) Annex 1
- Behaviours linked to safeguarding issues.
- Bullying including cyberbullying.
- Child on child abuse (inc sexual violence and sexual harassment/sexting-sharing

of nude/semi-nude images & upskirting)

- Children and the court system
- Children absent from education.
- Child missing from home or care.
- Child Criminal Exploitation (CCE)
- Child sexual exploitation (CSE)
- Child trafficking and modern slavery
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage.
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Grooming
- Homelessness
- Harmful sexual behaviour (HSB)
- Mental health
- Online safety
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Trafficking
- Witness to domestic abuse

For further information, advice and guidance on these issues please see Annex 2 of this document.

## 13 Children Potentially at Greater Risk of Harm

All children should be protected however  $1^{\rm st}$  Staff recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups: -

- Children who need a social worker (Child in Need and Child Protection)
- Children absent from education.
- Elective Home Education (EHE)
- Children requiring mental health support
- Looked after children and previously looked after children
- Children with special educational needs and disabilities/health issues
- Children who are lesbian, gay, bi or trans (LGBT)
- Paragraphs 170-204 of Keeping Children Safe 2025 explain in more detail about these groups. We support these groups by having:
  - Vigilance: to have adults notice when things are troubling them
  - Understanding and action: to be heard and understood; and to have that understanding acted upon.
  - Stability: to be able to develop an on-going stable relationship of trust with those helping them.
  - Respect: to be treated with the expectation that they are competent, rather than not.
  - o Information and engagement: to be informed about and involved in procedures, decisions, concerns, and plans.
  - Explanation: to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative.
  - Support: to be provided with support in their own right as well as a member of their family.
  - Advocacy: to be provided with advocacy, to assist them in putting forward their views.

#### Alternative Provision

At 1<sup>st</sup> Staff we know that the cohort of pupils in our provision often have complex needs and are aware of this additional risk of harm that our pupils may be vulnerable to.

We recognise that learners in alternative provision may have additional safeguarding vulnerabilities linked to prior exclusions, poor attendance, mental health, special educational needs, or experiences of exploitation.

Safeguarding in our setting includes close liaison with commissioning local authorities, careful transition planning, and rigorous risk assessment for all activities, including off-site learning and transport.

#### DfE Guidance:

- Alternative provision
- Education for children with health needs who cannot attend school

# 14 Allegations/Concerns Raised Against Staff/Volunteers

Our aim is to provide a safe and supportive environment securing wellbeing and best possible outcomes for the children we serve. We take all possible steps to safeguard our children and to ensure that the adults who work at  $1^{\rm st}$  Staff are safe to work with children. However, we do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

We ensure that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, and volunteers.

- Allegations that may meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold, referred to for the purposes of this guidance as 'low level concerns.'

#### Allegations that may meet the harms threshold

We have an good understanding and give due regard to Part 4 of <u>Keeping Children Safe in Education 2025</u> guidance where it is alleged that anyone working in our education setting providing education for children under 18 years of age has:

- Behaved in a way that has harmed a child or may have harmed a child and/or
- Possibly committed a criminal offence against or related to a child and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This relates to members of staff, and volunteers, who are currently working in any education setting, regardless of where the alleged abuse took place. Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police.

We understand that if we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our DSL will discuss with the agency whether it is appropriate to suspend the staff member or redeploy them whilst they carry out their investigation.

If an allegation is made or information is received about an adult who works at  $1^{\rm st}$  Staff which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the DSL and Head of Education immediately. If it is about the sole proprietor, then this needs to be raised with the Designated Officer. Should an allegation be made against the Head of Service or DSL this will be reported to the Managing Director. If the Managing Director is not available on the day, the information

must be passed to and dealt with by either the member of staff acting as Head of Education or the Deputy Safeguarding Lead.

The Head of Education or Managing Director will seek advice from the Local Authority Designated Officer (LADO) within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

# Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns.

At 1<sup>st</sup> Staff we promote an open and transparent culture in which all concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that adults who work in or on behalf of our service are clear about professional boundaries and act within them in accordance with our ethos and values.

#### What is a low-level concern?

Low level does not mean that it is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of the service may have acted in a way that is:

- Inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to our safeguarding policy for alternative provision settings
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating pupils

#### Sharing low-level concerns

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings.

If we are in any doubt as to whether information shared about a member of our staff as a

low-level concern in fact meets the harms threshold we will consult with the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the DSL knows to contact the LADO.

We have a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service.

# 15 Information Sharing

We work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with <u>Working Together 2023</u>, <u>Keeping Children Safe in Education 2025</u> and <u>Information sharing advice for safeguarding practitioners</u>

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Education Settings have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, we recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

We are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

1<sup>st</sup> Staff are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

1<sup>st</sup> Staff are committed to ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

Where children leave our setting, the DSL will ensure that any relevant Safeguarding file is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

In addition to the safeguarding file, our DSL will also consider if it would be appropriate to share any information with the new school, college, or alternative provision setting in

advance of the child leaving. For example, information that would allow the new setting to continue supporting the victims of abuse and have that support in place for when the child arrives.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

#### Guidance documents:

• Data Protection: Toolkit for schools

## **16** Managing Complaints

In line with our ethos and culture, we encourage children and parents/carers to talk to us if they are unhappy with anything. We have a robust internal investigation process. Our complaints policy states clearly the various stages of complaint and where to escalate concerns following completion and outcome of our complaints process. Our complaints policy is available on our website and on request for commissioning local authorities and parents/carers and is also available on request. Safeguarding concerns should be raised with service immediately. If a concern means a child is at immediate risk, then the individual needs to contact the local children's services board. All visitors are given safeguarding information which outlines how to share concerns and code of conduct expected by visitors/contractors.

## **17** Parental Response

Research and experience indicate that in our alternative provision context, many learners may live in varied family or care arrangements. The following parental or carer responses may indicate a safeguarding concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

## 18 Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

## 19 Behaviours Linked to Safeguarding Issues

All staff have an awareness of safeguarding issues that can put children at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

#### **Bullying, including Cyberbullying**

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

#### Guidance on bullying can be

- Preventing & tackling bullying
- Cyberbullying advice

# 20 Child on Child Abuse (incl. sexual violence and sexual harassment)

All staff have the knowledge and awareness that children are capable of abusing other children (including online).

Child-on-child abuse can occur, both physically and verbally, either online or face to face, between two children of any age and sex, with a single child or group of children and can happen both inside and outside of our setting. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

All staff at 1<sup>st</sup> Staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports of it. They understand the importance of the timely challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of:

- Making clear that child-on-child abuse including sexual violence and sexual harassment, is never acceptable and that that we have a zero-tolerance approach.
- Not dismissing this abuse as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual
  assaults e.g., grabbing bottoms, breasts, and genitalia, flicking bras and the lifting
  up of skirts.

All staff know that if we do not challenge and support our children that this will lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that our children feel confident to knowing their concerns will be treated seriously.

All victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the service or college will not be downplayed and will be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. We will ensure that children know that the law is in place to protect them rather than criminalise them, and we will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states 'child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of child-on-child abuse will be supported by the service's pastoral system and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding child-on-child abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL). Our staff will not develop high thresholds before acting.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may
  include an online element which facilitates, threatens and/or encourages sexual
  violence. Causing someone to engage in sexual activity without consent, such as
  forcing someone to strip, touch themselves sexually, or to engage in sexual activity
  with a third party.
- sexual harassment such as sexual comments, remarks about clothes and/or
- appearance, jokes, taunting and online sexual harassment. This also includes the
  telling of sexual stories, making lewd comments, and calling someone sexual names
  and physical behaviour, such as: deliberately brushing against someone, interfering
  with someone's clothes, and displaying pictures, photos, or drawings of a sexual
  nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

If staff have a concern about a child or a child makes a report to them, they will follow the safeguarding referral process. As in any case, if staff are in any doubt as to what to do, they should speak to the DSL/DDSL. Our behaviour policy will support any sanctions.

The DfE states 'Child on Child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

#### **Guidance Documents:**

- <u>Disrespect NoBody campaign</u>
- <u>CEOP-Safety centre</u>
- <u>UKCIS Guidance: Sharing Nudes and Semi-Nudes</u>
- Review of sexual abuse in schools and colleges GOV.UK (www.gov.uk)
- Searching, screening and confiscation (publishing.service.gov.uk)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people GOV.UK (www.gov.uk)
- <u>Undressed (lgfl.net)</u>

### 21 Children Absent in Education

All professionals working with children, as well as the wider community can help by remaining vigilant to children's safety. The law states every child should be receiving an education, and we stand a better chance of ensuring a child's safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who are absent from education.

A child going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

We hold **at least 2** emergency contact numbers for each pupil. If a child is absent and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some children.

The service will notify the commissioning Local Authority of any learner who fails to attend regularly after making reasonable enquiries or has been absent without the service's permission for a continuous period of 10 days or more. The service (regardless of designation) will also notify the commissioning Local Authority of any learner who is to be deleted from the admission register because s/he:

• Has been taken out of service by their parents and is being educated outside the

- service system (e.g., elective home education).
- Has ceased to attend school and no longer lives within a reasonable distance of the school at which s/he is registered (moved within the city, within the country or moved abroad or to a new location but failed to notify the provision or commissioning local authority of the change).
- Displaced because of a crisis e.g., domestic violence or homelessness.
- Has been certified by the a qualified medical professional as unlikely to be in a
  fit state of health to attend education before ceasing to be of compulsory school
  age, and neither s/he nor his/her parent has indicated the intention to continue to
  attend education after ceasing to be of compulsory school age;
- Is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe that s/he will return to the school at the end of that period; or

Our service will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing'

## **22** Child Missing from Home or Care

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children.

Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Given the vulnerabilities of learners placed in alternative provision, any incident of going missing from home, care, or placement will be treated as a safeguarding concern and notified to the commissioning local authority in addition to standard procedures.

#### Guidance document

Children who run away or go missing from home or care

# 23 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CSE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes

advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Learners in alternative provision may be at higher risk of exploitation due to previous disengagement from education, community vulnerabilities, and peer influences outside of mainstream school environments.

#### Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or do not take part in education.

#### Guidance documents:

Safeguarding children who may have been trafficked

#### Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g.; they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

#### Guidance documents:

- Child Sexual Exploitation Definition & Guidance
- Know about CSE

## **24** County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered. Further information can be found here National Referral Mechanism

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

Can affect any child or young person (male or female) under the age of 18 years.

- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and

Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

#### **Guidance Document:**

- Criminal Exploitation of Children and Vulnerable Adults; County Lines
- County Lines toolkit

Staff will be vigilant for signs of exploitation during transport to and from the provision, vocational placements, or other off-site learning activities.

## **25** Domestic Abuse

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life.

#### **Guidance Documents:**

- <u>Domestic Violence and Abuse</u>
- NSPCC-Domestic Abuse

## 26 Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

#### **Guidance Documents:**

- NSPCC-Parental Substance Misuse
- Drugs Advise for Schools

## 27 Fabricated or Induced Illness (FII)

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child.

#### **Guidance Documents:**

Safeguarding children in whom illness is fabricated or induced

## 28 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will **not** replace a referral into children's social care where a child has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 yr. olds could be living independently from their parents or guardians and they will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure that appropriate referrals are made based on the child's circumstances.

### 29 Honour-Based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors, when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

# 30 Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse".

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures. The DSL or deputy DSL will complete a Multi-Agency Referral Form and send it to the duty social worker of the child's Local Authority within 24 hours.

## Use the following links to report abuse:

Area	How to report a concern
Barking and Dagenham	Concerned about a child LBBD
Bedfordshire	Concerned about a child Bedfordshire
Bolton	Concerned about a child Bolton
Bournemouth	Concerned about a child Bournemouth
Cambridge	Concerned about a child Cambridge
Camden	Concerned about a child Camden
Cheshire East	Concerned about a child Cheshire East
Derby	Concerned about a child Derby
Doncaster	Concerned about a child Doncaster
Dorset	Concerned about a child Dorset
Essex	Concerned about a child Essex
Hackney	Concerned about a child Hackney
Hammersmith and Fulham	Concerned about a child Hammersmith and Fulham
Havering	Concerned about a child Havering
Hertfordshire	Concerned about a child Hertfordshire
Isle of Wight	Concerned about a child Isle of Wight
Islington	Concerned about a child Islington
Lancashire	Concerned about a child Lancashire
Manchester	Concerned about a child Manchester
Medway	Concerned about a child Medway
Newcastle	Concerned about a child Newcastle
Norfolk	Concerned about a child Norfolk
North Tyneside	Concerned about a child North Tyneside

Nottingham	Concerned about a child Nottingham
Oxford	Concerned about a child Oxford
Reading	Concerned about a child Reading
Redbridge	Concerned about a child Redbridge
Rochdale	Concerned about a child Rochdale
Southend	Concerned about a child Southend
Southwark	Concerned about a child Southwark
Stafford	Concerned about a child Stafford
Stockport	Concerned about a child Stockport
Stockton	Concerned about a child Stockton
Stoke	Concerned about a child Stoke
Suffolk	Concerned about a child Suffolk
Trafford	Concerned about a child Trafford
Waltham Forest	Concerned about a child Waltham Forest
Wolverhampton	Concerned about a child Wolverhampton

#### **Guidance Documents:**

- Multi Agency Statutory guidance on Female Genital Mutilation
- Female Genital Mutilation Act 2003

## **31** Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one, entered, without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived culture practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must

be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

#### Guidance Document:

- Forced Marriage
- The right to choose: government guidance on forced marriage

### 32 Mental Health

All staff have an important role to play in supporting the mental health and wellbeing of our pupils and are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Guidance and helpful documents: -

- Addressing Trauma and Adversity
- Mental Health and Behaviour in Schools Guidance.
- Preventing and tackling bullying
- Every Interaction Matters
- MIND-Parenting Capacity and Mental Health
- NSPCC-Mental Health and Parenting

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and by speaking to the designated safeguarding lead or a deputy.

In our alternative provision setting, learners may join with pre-existing mental health needs linked to past educational trauma, exclusion, or complex home situations. Staff will receive specific training on supporting these needs and referring appropriately.

# **33** Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provides the platform that facilitates harm.

At 1<sup>st</sup> Staff we realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole service/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

In line with KCSiE 2025, our filtering and monitoring systems will be reviewed at least annually, with a summary of findings and any improvements reported to the Directors.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- <u>Content</u>: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- <u>Contact</u>: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- <u>Conduct</u>: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- <u>Commerce</u>: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated by our IT and DSL. As part of our filtering and monitoring systems we have URL filtering, content filtering and keywork filtering to ensure the flagging and blocking of specific content and raising alerts with our DSL. Our monitoring systems provide real time alerts to the DSL when our policy has been breached. We are then able to appropriately risk assess and implement control measures to address potential risks related to the

radicalisation and extremism as required by the prevent duty.

### **Guidance Documents:**

- Children's Commissioner-Online Safety
- Teaching online safety in education settings
- Appropriate Filtering and Monitoring
- CEOP-Safety Centre
- National Cyber Security Centre
- NSPCC-Undertaking remote teaching safely
- <u>360 Degree Safe Online Safety Review Tool</u>
- <u>UKCCIS-UK Council for Child Internet Safety</u>

# **34** Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Our staff will notify the DSL/DDSL when they become aware of a private fostering arrangement. There is a mandatory duty on the service to inform Children's Social Care of a private fostering arrangement, who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

We will notify the local authority if we become aware of any learner under 16 (or under 18 if disabled) in a private fostering arrangement, regardless of whether they attend our provision full-time or part-time.

#### Guidance Document:

Children Act 1989 – Private Fostering

# **35** Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a services' or colleges' safeguarding approach. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include <a href="Channel">Channel</a>, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a
  person/people; causes serious damage to property; or seriously interferes or
  disrupts an electronic system. The use or threat must be designed to influence
  the government or to intimidate the public and is made for the purpose of
  advancing a political, religious, or ideological cause.

We value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils/students and service staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. We are clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of our safeguarding duty.

The designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

# **36** Prevent Duty

All schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (<u>Prevent Duty Guidance: England and Wales 2023</u>). This is known as The Prevent Duty and is part of our Companies wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and covers childcare). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

1<sup>st</sup> Staffs DSL will the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism

## **37** Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absences, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

#### Guidance documents:

- Home Office Preventing Youth Violence and Gang Involvement
- Criminal Exploitation of Children and Vulnerable Adults; County Lines

# 38 Allegations of Abuse Made Against Other Pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up."

Most cases of pupils hurting other pupils will be dealt with under our service's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious and potentially a criminal offence
- Could put pupils in the service at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil:

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved
  - both the victim(s) and the child(ren) against whom the allegation has been made
    - with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## 39 Mobile Phones and Cameras

Staff are allowed to bring their personal phones to the sessions for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

 $1^{st}$  Staff will provide mobile phones to the staff members for emergency contacts and to

take pictures or videos, provided that parents or carers gave written permission.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the service.

# **40** Record Keeping

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and made available only to those who have a right or professional need to see them.

All paper documents, whether received by mail or directly from parents/carers or professionals, are securely stored in a locked cabinet at head office. Access is strictly limited to the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL). Paperwork is retained only for the necessary duration. Once the information is transferred to our online system, the original paper copies are securely destroyed.

Safeguarding records relating to individual children will be retained for a reasonable period after they have left our service.

In the event a pupil moves to a new service, any safeguarding records pertaining to that child will be passed on to the new service or school and a form signed by both parties to acknowledge receipt of the files will be kept (in accordance with the NSPCC Child Protection Records Retention and Storage Guidelines August 2018).

Records kept digitally will be accessible only by the DSL and Deputy DSL. They are protected by password with Multifactor authentication.

# **41** Monitoring & Review

Live operations: the Designated Safeguarding Lead (DSL) oversees triage/escalation of concerns (including LADO referrals) and confirms timely, accurate recording.

### Monthly:

- 1. Case-file dip-sampling (chronology, threshold decisions, actions complete).
- 2. Training & induction compliance check (all staff up to date with required safeguarding modules/statutory guidance).
- Low-level concerns & allegations log review (themes/actions fed back to managers).

## Termly:

 Pattern analysis across behaviour, attendance/CME, online safety and home-tuition contexts; actions agreed with the Education Director and Director of Operations.

- Restricted-repository access review with the Records Manager and IT Manager (least-privilege, leavers removed, external shares time-boxed).
- CIEM debriefs (where relevant) feed lessons learned into this policy and staff training.
- Safer recruitment/workforce spot-checks with the HR Lead (induction, supervision, SCR extracts as appropriate).

Annually (or sooner on change): formal policy review by the DSL with the Education Director, Director of Operations, Data Protection Officer, Records Manager and IT Manager; statutory alignment check; staff briefing issued; induction materials updated.

Assurance & reporting: a termly safeguarding dashboard (key metrics, risks, actions) is issued to senior leadership; significant risks/themes are escalated to the Head of Service (Education Director) for decision and resourcing.

Record-keeping: monitoring records (audits, dashboards, actions) are retained in the restricted safeguarding repository in line with the Records Management & Retention Schedule.

# Linked policies

- Preventing Extremism & Radicalisation
- Whistleblowing
- Safer Recruitment
- Code of Conduct
- Intimate Care & Safe Touch
- Positive Behaviour
- Online Safety & IT Use
- Information Security
- Lone Worker
- First Aid
- Managing Allegations & Low-Level Concerns
- Child-on-Child Abuse
- Home Tuition Protocol
- Educational Visits & Off-Site
- Critical Incident & Emergency Management

## **Definitions and Indicators of Abuse**

- Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
  - Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
  - Protect a child from physical and emotional harm or danger.
  - Ensure adequate supervision (including the use of inadequate caregivers); or
  - Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect
- 2. Physical Abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following may be indicators of physical abuse (this is not designed to be used as a

## checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.
- 3. Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.

- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.
- 4. Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics, and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as "traumatic mutism") can indicate maltreatment.

## Safer recruitment and DBS checks - policy and procedures

We will record all information on the checks carried out in the service's single central record (SCR). Copies of these checks, where appropriate, will be held in an individuals' personnel files.

We follow requirements and best practices in retaining copies of these checks, as set out below.

## Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS)
  certificate, including barred list information for those who will be engaging in
  regulated activity (see definition below). We will keep the certificate number and
  date of issue on our SCR for the duration of employment and then no longer than 6
  months following the end of employment.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Online searches will also be included to further check an applicant's suitability.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher/tutor
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority (or their equivalent), and criminal records checks
- 1st Staff will ensure all references to be provided from professional email accounts,
   1st staff will verify each reference to ensure their authenticity as per the KCSIE guidance.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.

## **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or

#### vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e., that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the <u>Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria</u> and <u>Miscellaneous Provisions)</u> Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work for our company, has had the appropriate level of DBS check. This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity.

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Ask for written information about previous employment history and check that information is not contradictory or incomplete. We will seek references on all short-listed candidates, including internal candidates, before any interview.

We will scrutinise these and resolve any concerns before confirming appointments.

## Regulated activity means a person who will be:

Responsible, on a regular basis in a school/college or otherwise, for teaching, training, instructing, caring for or supervising children

Carrying out paid, or unsupervised unpaid, work regularly in a school/college or otherwise where that work provides an opportunity for contact with children

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

## Allegations about a Member of Staff or Volunteer

1. Inappropriate behaviour by staff/volunteers could take the following forms:

## Physical

 For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.

#### Emotional

 For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.

#### Sexual

 For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.

## Neglect

 For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.

#### Spiritual Abuse

- For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.
- 2. If a child makes an allegation about a member of staff, volunteer the Head of Education/DSL must be informed immediately. The Head of Education/DSL must carry out an urgent initial consideration to establish whether there is substance to the allegation. The Head of Education or DSL should not carry out the investigation him/herself or interview pupils.
- 3. The Head of Education/DSL will exercise and be accountable for their professional judgement on the action to be taken as follows:
  - If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Head Teacher/Principal will notify the relevant LADO. The LADO will liaise with the DSL and advise about action to

- be taken and may initiate internal referrals within Children's Social Care to address the needs of children likely to have been affected.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil. These should be addressed through the school's own internal procedures.
- If the Head of Service / DSL decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child safeguarding file.
- 4. Where we are not the employer of an individual, we still have a responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers). In no circumstances will we cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. DSL will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them, whilst they carry out their investigation.
- 5. Where an allegation has been made against the Head of Service/ DSL takes on the role of liaising with the LADO in determining the appropriate way forward.
- 6. Where the allegation is against the sole proprietor, the referral should be made to the LADO directly.

## Indicators of Vulnerability to Radicalisation

- 1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- 2. Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- 3. Extremism is defined by the Crown Prosecution Service as:
  - The demonstration of unacceptable behaviour by using any means or medium to express views which
  - Encourage, justify, or glorify terrorist violence in furtherance of beliefs
  - Seek to provoke others to terrorist acts
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts or
  - Foster hatred which might lead to inter-community violence in the UK.
- 4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
- 5. Pupils may become susceptible to radicalisation through a range of social, personal, and environmental factors it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.
- 6. Indicators of vulnerability include:
  - Identity Crisis the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
  - Personal Crisis the student/pupil may be experiencing family tensions; a sense
    of isolation; and low self-esteem; they may have dissociated from their existing
    friendship group and become involved with a new and different group of friends;
    they may be searching for answers to questions about identity, faith and
    belonging.
  - Personal Circumstances migration; local community tensions; and events affecting the student/pupil's country or region of origin may contribute to a

- sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Need students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
- 7. This list is not exhaustive, nor does it mean that all children experiencing the above are at risk of radicalisation for the purposes of violent extremism.
- 8. More critical risk factors could include:
  - Being in contact with extremist recruiters.
  - Family members convicted of a terrorism act
  - Accessing violent extremist websites, especially those with a social networking element.
  - Possessing or accessing violent extremist literature.
  - Using extremist narratives and a global ideology to explain personal disadvantage.
  - Justifying the use of violence to solve societal issues.
  - Joining or seeking to join extremist organisations.
  - Significant changes to appearance and/or behaviour; and
  - Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

# **Useful Safeguarding Links**

## **NSPCC**

- Harmful sexual behaviour (HSB) NSPCC Learning
- Keeping children safe online-online safety/sexting/sending nudes

## **National Contacts**

- CEOP (Child Exploitation and Online Protection) <u>CEOP Safety Centre</u>
- Professionals Online Safety Helpline 0844 381 4772 <u>Safer Internet Helpline</u>
- Internet Watch Foundation (IWF) <u>Internet Watch Foundation</u>
- Safer Internet Centre <u>helpline@saferinternet.org.uk</u>
- Childline 0800 1111 Childline
- Ofsted
  - o General enquiries:0300 123 1231
  - About Schools: 0300 123 4234
  - Concerns: 0300 123 4666e-mail: enquiries@ofsted.gov.uk
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) <u>www.educateagainsthate.com</u>
- NSPCC Harmful Sexual Behaviour project: 0844 892 0273

## Useful websites

- Child Exploitation and Online Protection Centre (CEOP) <u>Ceop-Police</u> & <u>knowaboutcse</u>
- NSPCC 24-hour Child Protection Helpline 0808 800 5000 NSPCC
- Women's Aid 24 Hour Helpline: 0870 2700 123
- UNICEF Support Care Team 0300 330 5580 (Mon Fri 8am-6pm). If you think a child is in immediate danger, please call 999. <u>Unicef</u>

# Child Protection and Safeguarding Procedure.

It is vital that all staff know:

- How to identify the signs and symptoms of possible abuse.
- How to raise a concern and who to raise these to.
- What the relevant and up to date child protection procedures are, including internal procedures.
- What the reporting procedure is.
- Who the Designated lead and the Deputies are.
- And their role in safeguarding.

If you have a concern about a child, whether you think these are minor or major concerns, these are to be passed onto the DSL for further support or advice. You can discuss this with your area lead should you wish to in the first instance, however, this may not always be time effective. If you do approach the DSL/DDSL, it is best practice to notify your Area Lead that this concern has been brought to the attention of the Safeguarding team for advice and inform your Area Lead of the actions taken or advice given.

If you take your concern directly to your Area Lead, your lead should advise you on appropriate action to take. This should include to contact myself (Shannon Ramsey – DLS) or in the DSL absence, Coren Murley (DDSL) Nicola Brown (DDSL) where a concern needs to be raised or escalated.

We advise that you call us with any concern, so that we can advise you appropriately before submitting any cause for concerns through our system, this is due to advice sought from us will need to be documented on the concern form or we may advise you to take a different path of action.

Once you have spoken to Myself, Coren or Nicola, you will be given clear instructions on how to action your concern.

This could be that we ask you to complete a cause for concern form, an incident form, an ABC or continue to monitor and log internally.

A cause for concern form can be located on your area's teams down the left-hand side where you will see cause for concern link that will lead you to fill a cause for concern.

If you have been instructed to complete this, it must be done immediately following the end of your session or when it may be safe to do so.

If you have a morning student, all causes for concerns MUST be completed by 12:30pm at the latest and an afternoon student by 4pm at the latest. We must not receive paperwork later than 4pm. This is due to the safeguarding team having to escalate this further. Should there be any reason that you are unable to complete the paperwork within this timeframe, it is your responsibility to reach out to the DSL and explain the reason why and verbally hand over the concern so that the escalation process can begin while the DSL waits for the formal written log.

In the event that your student is absent for 48 hours (48 hours (Including a weekend.) or 2 whole sessions) and it has not been reported as a medical absence or illness, your area lead or a member of the safeguarding team may ask you to complete an attendance check.

This check should be completed within the normal session time and is an unannounced check.

Once the check has been completed, you will have to complete the attendance check record sheet, you will also find this on teams.

If you complete the attendance, check and your student is still not seen, a call should be placed again to the safeguarding team who will advise you to complete the necessary next steps.

All concerns are valid however, we ask that our processes are followed to ensure that we have followed our safeguarding policy and are adhering to <u>Keeping Children Safe in</u> Education 2025.

Should external agencies need to be involved, you have the right to make referrals however, we ask that this is discussed with the safeguarding team prior to any social care referrals being made.

If you have concerns relating to any student and their wellbeing this must be reported immediately to Coren or Myself.

I am more than happy to go through any paperwork with you should you need support.

Please advise that all staff are required to have completed the below courses on Educare

- FGM
- Safeguarding young people
- Prevent duty
- Child protection
- Child protection refresher 2025

All staff must also ensure that they have read and shown an understanding of KCSiE.

## Safeguarding team contact details:

Shannon Ramsey: 07935 346 740 / 0330 174 8191

Shannon@1ststaff.co.uk

Coren Murley DDSL: 07345 449 325 / 0330 174 8191

Coren@1ststaff.co.uk

Nicola Brown DDSL: 07895 204 458

Nicola@1ststaff.co.uk

If you are unable to reach us, please send us an email or a message on teams and we will get back to you as soon as possible. It may be that we are in meetings or supporting other staff with concerns and unable to answer, but we will always get back to you.