



Safeguarding & Child Protection Policy

Document number:	2
School:	<i>Coventry</i>
Issue:	4.3
Owner:	<i>Group Safeguarding Lead</i>
Approved by:	<i>The Executive Board</i>
Effective date:	<i>29 August 2023</i>
Next review due by:	<i>15 August 2024</i>

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2. Issue and Revision History

Issue	Description	Author	Effective Date
1.0	Initial Release	T. Warner	01/09/09
2.0	Re-write	J. Payne	01/09/11

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2.1	Addition of Appendix 2 to 7.5 for LearnFit sites	J. Payne	15/08/12
3.0	Annual Review Changed title Revised document structure removing 'Reference Documents', added 'Summary' section, added 'Document Release', added 'Next Review Date', updated 'Scope', updated 'Definitions and Acronyms'	T. Warner / J. Payne	26/08/13
3.1	Annual Review	T. Warner	02/09/14
3.2	Purpose and scope update with current legislation. New aims	T. Warner / D. Payne	06/10/15
3.3	Addition of references to radicalisation and FGM. Links to WRL service specific procedure. Addition of appendices A; Allegations against a person who works with children and B All round checklist	T. Warner/ D.Payne	11/12/15
3.4	Addition of Appendices 5, 6a and 6b Statutory reporting of FGM to police.	T. Warner / D. Payne	25/05/16
3.5	Addition of Flow Chart For Raising Safeguarding Concerns About a Child 6.12 Addition of acronym KCSIE Keeping Children Safe in Education 2016 6.13 Addition of acronym CSE, child sexual exploitation 7.19 Addition of whistleblowing NSPCC helpline 7.4 added see appendix 3 for signs of abuse 1. Added to appendix 3 Signs of grooming and child sexual exploitation.	D. Payne	28/05/17
3.6	4. Purpose; 7.1 Aims; Appendix 2, added No Secrets Agenda;	Debbie Payne	12/12/17
3.7	Safeguarding update Keeping Children Safe in Education 2018	Debbie Payne	04/09/18
3.8	Update to Appendix 4 Flowchart	Tim Warner	04/03/19
3.9	Annual Review: KCSIE Update 2019 4.4 Publications 7.1.3 Bullet 14 7.5.4, 7.5.5, 7.5.6 7.11.1, 7.11.2, 7.11.5 8.2, 8.6, 8.7, 8.8, 8.9, 8.10 10 Update Contact Info	Debbie Payne	07/08/19

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	Appendix 3 UPDATES: Criminal Exploitation and County Lines, DfE's What to do if you're worried a child is being abused (March 2015)		
3.10	KCSIE Update 2019 7.2 Key Contacts 7.3 Child Protection Procedures 7.4 Management of Child Protection Matters 7.9 PROCEDURES WHEN A MEMBER OF STAFF IS WORRIED ABOUT A CHILD 7.10 Allegations against staff Appendices 1, 2 & 4	Debbie Payne	24/09/19
3.11	Updated link to new F0008SA Safeguarding Record Form - now using JotForm Removed visual image of form in Appendix 1	Tim Warner	20/02/20
3.12	Annual Review KCSIE update Sept 2020 Update to 4.4 Additional Legislation list Update to 7.2 Key Contacts Additional wording 7.5.1 & 7.5.2 Reference to Mental Health 7.8.1 Reword 7.9.1 Addition of HBA to 7.9.4 Reword and inclusion of HBA 7.9.5 Addition of context based to 7.11.3 Update 10 Other contacts Addition of CCE and reword of table in Appendix 3	Debbie Payne	21/08/20
3.13	KCSIE Jan 21 Purpose - definition update as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action in the best interests of the child to ensure the best outcomes. 7.8.2 Safer recruitment procedures updated Annual updates for all staff. Suitability of who serves on the Executive Board.	Debbie Payne	31/01/21

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	Suitability of staff working with young people and volunteers.		
4.0	<p>Annual Review and rewrite for ISS</p> <p>Lead tutor replaced with Head of School Lead Instructor replaced with Head of School</p> <p>Update to Key Contacts - Central Management.</p> <p>KCSIE Update Sep 21 Addition of My Concern</p> <p>Summary - Reporting systems have a whole school approach.</p> <p>5 Purpose: - Good safeguarding requirements</p> <p>9.12 The requirement for Online training and that technology is a significant component to safeguarding.</p> <p>Appendix for part 4: Low level concerns</p> <p>9.3 Confidentiality - Information sharing.</p> <p>9.4.6 Mental health concern about a child is also a safeguarding concern.</p> <p>9.4.8 Use of mobile and smart technology to share indecent images.</p> <p>9.6 Children with special educational needs and disabilities or physical health issues, added mental health may cause barriers. SEND register to identify where support may be needed.</p> <p>Appendix 3 Safer recruitment update on visiting professionals</p>	Deborah Payne	01/09/21
4.1	Annual Review - KCSIE update 2022	Deborah Payne	17/08/2022

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	<p>Updated 'Purpose' to include description of safeguarding and promoting the welfare of children KCSIE 2022; inclusion of Human Rights Act 1998 and Equality Act 2010.</p> <p>9.1 Equality Statement updated as per KCSIE 2022; addition of Human Rights</p> <p>9.4.2 Addition to disclosure information as per KCSIE 2022</p> <p>9.4.4 Addition of Cause for Concern</p> <p>9.4.8 Terminology change - Peer on Peer changed to Child on Child</p> <p>9.4.9 Addition of Cause for Concern</p> <p>9.8.1 Re-write to section Online Safety</p> <p>9.12.3 Updated section as per KCSIE 2022</p> <p>11 & 12 Remove Safeguarding Record Form</p> <p>Appendix 3 - Update to appointment list for new staff</p> <p>Appendix 4 - New heading 'Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors' as per KCSIE 2022; Addition of 'Low Level Concerns' information including sharing of these concerns; Update to paragraph 'Learning Lessons'.</p> <p>Appendix 6 - Updated section 'Domestic Abuse'; Added section 'Children who are lesbian, gay, bi, or trans (LGBT)'</p> <p>Appendix 7 - Added contact details for 2 additional agencies.</p>		
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4.2	Update to section 8. Important Contacts Educ8 Group DSL change to Educ8 Head of Safeguarding Educ8 Head of Safeguarding named as Deborah Payne Appendix 4 update all references of Group DSL to Head of Safeguarding 9.2.3 Updated to Head of Safeguarding	Jevon Payne	01/04/23
4.3	<p>Purpose - added link for Behaviour in schools, updated Oct 2022 added link DFE Meeting digital and technology standards in schools and colleges – Published 23 March 2022 - Updated 29th March 2023</p> <p>All references to MyConcern replaced with Cause for Concern</p> <p>9.9 Update regarding filtering and monitoring</p> <p>Guidance about ‘children missing in education’ has been replaced with ‘children who are absent from education for prolonged periods and/or repeated occasions.</p> <p>Children who may be ‘vulnerable’ has been replaced with children who may be ‘susceptible’.</p> <p>Appendix 6 - update Forced Marriage - Reflects change in law from February 2023, Terrorism - This includes being ‘susceptible’</p>	Debbie Payne	29/08/23

3. Summary

The Executive Board of Educ8 and all staff are committed to acting in the best interests of the child and the reporting systems have a whole school approach (KCSIE Sept 2023). Measures are taken to ensure that safeguarding awareness and procedures are understood by all adults and Learners who attend or visit Educ8 venues.

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This policy has been authorised by the Executive Board of Educ8, is addressed to all of the Executive Board, members of staff and volunteers, and is available to parents on request. This policy can be made available in large print or other accessible format if required.

It applies wherever staff or volunteers are working with learners, even when this is away from the school, for example, at an activity centre, or on an educational visit. All adults in the Educ8 community are responsible for safeguarding and promoting the welfare of children, we encourage all staff to be vigilant to the signs of abuse and to report any concerns to the Designated Safeguarding Lead.

It is important to remember that anyone can make a referral if they are unhappy with the way a case is being handled.

Where there is a safeguarding concern, Educ8's Executive Board, proprietor and Head of School ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.'(KCSIE Sept 2023)

Safeguarding reports are made using the [F008SA Cause for Concern](#) form.

4. Document Release

This document has been reviewed in accordance with the Educ8 Quality System and the requirements of this policy/procedure. Staff have been made aware of its issue, including any updates/amendments to its contents and where necessary appropriate training has been provided to those staff.

Where policies are available for download online, the previous version is removed and this new version replaces it.

The release of this document is indicated by the effective date.

This policy will be reviewed annually by the Educ8 Group Incident and Safeguarding Governance Committee. At every review, it will be approved by the full Executive Board. Local procedures will be reviewed annually by the Site Lead. Every review will be approved by the Safeguarding Director.

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5. Purpose

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interest of the child (KCSIE 23)

Safeguarding and promoting the welfare of children according to the Dfe KCSIE 2023 as:

- protecting children from maltreatment
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

Educ8 aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Legislation and statutory guidance:

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education 2022](#) and [Working Together to Safeguard Children \(2018\) updated Dec 2020](#), and the [Governance Handbook](#). We comply with this guidance and sites abide by the arrangements agreed and published by their local safeguarding partners.

This policy is also based on the following legislation:

- [The Education \(Independent School Standards\) Regulations 2014](#) which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school

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- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [Human Rights Act 1998](#), which lets you defend your rights in UK courts and compels public organisations – including the Government, police and local councils – to treat everyone equally, with fairness, dignity and respect.
- [Equality Act 2010](#), which aims to legally protect people from discrimination in the workplace and in wider society
- [Behaviour in Schools](#) updated Oct 2022 Advice for headteachers and school staff
- [DFE Meeting digital and technology standards in schools and colleges](#) Published 23 March 2022 - Updated 29th March 2023

6. Scope

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and those acting in a governance capacity. Our policy and procedures also apply to extended site and off-site activities.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

Protection of both participants and staff is paramount throughout this policy and is in line with procedures set out by Local Safeguarding Children's Partnerships (LSCP) relevant to the area in which the policy/procedure is applied.

7. Definitions and Acronyms

Head of Safeguarding	Responsible for developing and quality assuring safeguarding activity across Educ8 Group and supporting best practice for external stakeholders.
Delivery Staff	Staff employed by Educ8 to provide instruction and tutoring services
Incident	Any accident, cause of injury (ie. Head injury or fracture), child protection/safeguarding allegation/event, or any other event that was failed to be controlled using risk reduction controls.
DSL	Designated Safeguarding Lead. This as an Educ8 employee with responsibility for Safeguarding.
DDSL	Deputy Designated Safeguarding Lead. This is an Educ8 employee with responsibility for Safeguarding at their school when the DSL is absent.
Learners	All students, participants and users of Educ8 learning programmes. Generally these are under 18 years of age.
LSCP	Local Safeguarding Children's Partnership
Supporting Staff	Volunteers, apprentices, work experience students, supply staff, and other members of the team present during service delivery.
LADO	The Local Authority Designated Officer
SPA	Team within the local authority providing a Single Point of Access for reporting concerns

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FGM	Female Genital Mutilation
KCSIE	DfE Document: 'Keeping Children Safe in Education: for schools and colleges' (see GOV.UK for most recent version)
CSE	Child Sexual Exploitation
Must	Is a legal term and must be followed
Should	Follow unless you have a good reason not to
Setting/Provision	Site where delivery takes place.
Executive Board	Directors/Senior staff with Governance responsibilities for the provision
CEOP	Child Exploitation Online Prevention
ICP	Individual Care Plan
CHANNEL	Channel provides support across the country to those who may be vulnerable to being drawn into terrorism.
HBA	Honour Based Abuse
CCE	Child Criminal Exploitation
DBS	Disclosure and Barring Service
Cause for Concern	Form used for recording, managing, and reporting all safeguarding concerns.

8. Important Contacts

Role / Organisation	Name	Contact details
Head of School / Designated Safeguarding	Anthony Allen	024 7736 0053 07931 938089

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Lead (DSL)		
Deputy DSL	Jordan Roberts	024 7736 0053
Out of hours contact:	Debbie Payne	07814 447577
Local Authority Designated Officer (LADO)	LADO Coventry	024 7697 5483
Educ8 Head of Safeguarding	Deborah Payne	07814 447577
Channel helpline		020 7340 7264
How to report child abuse to the Local Council		https://www.gov.uk/report-child-abuse-to-local-council

In the event of an allegation against the School Lead, you should contact the Executive Head. An allegation against the Executive Head should be reported to the Educ8 Director responsible for Safeguarding.

8.1 Other Contacts

Role / Organisation	Contact details
Childline	0800 1111
NSPCC NSPCC Whistleblowing advice line for professionals	0808 800 5000 0800 028 0285 or email: help@nspcc.org.uk
Ofsted's Whistleblower Hotline	0300 123 3155
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child Exploitation Online Prevention (CEOP)	0870 000 3344
Samaritans	116 123
Ofsted	0300 123 1231 (General Enquiries) enquiries@ofsted.gov.uk
The Disclosure and Barring Service (DBS)	03000 200 190

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Department for Education	0207 340 7264		
Independent Provisions Inspectorate	0207 6000100		
Refuge: National Domestic Abuse Helpline	0808 2000 247		
Operation Encompass: Teacher Helpline <i>(Advice from an Educational or Clinical Psychologist about how best to support children who may be experiencing abuse)</i>	operation encompass 0204 513 9990 Monday to Friday, 8am-1pm		

9. Policy

9.1 Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- pupils who have or are being discriminated against because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics) and Educ8 will take positive action, where proportionate, to deal with the disadvantages these pupils face in our schools. KCSIE 22
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation Are asylum seekers

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- Are at risk due to either their own or a family member’s mental health needs Are looked after or previously looked after (see section 10)

9.1.1 Human Rights

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

9.2 Roles and responsibilities

9.2.1 All Staff

All staff will read and understand Part 1 and Annex A of the Department for Education’s statutory safeguarding guidance, [Keeping Children Safe in Education 2023](#) and review this guidance at least annually, undertaking annual online KCSIE training.

All staff will be aware of:

- Our systems which support safeguarding, including this safeguarding and child protection policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and their deputies, the behaviour policy, and the safeguarding response to children who go missing from education and how to use a Cause for Concern
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

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- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 9.4 and appendix 2 of this policy outline in more detail how staff are supported to do this.

9.2.2 The Designated Safeguarding Lead (DSL)

The DSL is the Head of School. Specific contact details are provided in section 8 of this policy. The DSL takes lead responsibility for child protection and wider safeguarding for their school.

During term time, the DSL in education provision, will be available during site hours for staff to discuss any safeguarding concerns.

Details of how the DSL can be contacted out of hours if necessary is outlined in section 8. When the DSL is absent, the deputies outlined in section 8 will act as cover.

If the DSL and deputies are not available, the Head of Safeguarding named in section 8 will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice, support and training 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
- Review Cause for Concern and ensure it is up to date and completed correctly – New cases should be triaged within 2 hours wherever possible. Open cases should be reviewed at least weekly with updates recorded. When a case is closed the DSL must ensure all fields have been fully completed and that all actions are clear and robust.

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- The DSL will also keep the Executive Head and the Head of Safeguarding informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- The full responsibilities of the DSL and deputies are set out in their job description.
- **Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction**
- Communicating this policy to parents when their child joins the school/college/home and via the website
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 4)
- Ensuring the relevant staffing ratios are met, where applicable

9.2.3 The Head of Safeguarding

- Will approve the local procedures at each review, ensure it complies with the law and hold the Head of School to account for its implementation.
- Will monitor the effectiveness of this policy in conjunction with those acting in a governance role at the site. This is always a different person from the DSL.
- Will review Cause for Concern on a monthly basis and hold site leads to account where it is not up to date or records indicate non-compliance.
- Will act as the ‘case manager’ in the event that an allegation of abuse is made against the Head of School, where appropriate (see appendix 4).
- Will ensure those acting in a governance role read Keeping Children Safe in Education. Section 9.12 has information on how governors are supported to fulfil their role.

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9.2.4 The Educ8 Director of Safeguarding

- Will approve the policy at each review, ensure it complies with the law and hold Head of Schools to account for its implementation.
- Will monitor the effectiveness of this policy.
- Will review Cause for Concern on a monthly basis and hold site leads to account where it is not up to date or records indicate non-compliance.

9.3 Confidentiality

Educ8 is committed to conducting its business in accordance with all applicable Confidentiality and Data Protection laws and regulations and in line with the highest standards of ethical conduct. Staff should refer to [16 Confidentiality Policy](#), [11 General Data Protection \(GDPR\) Policy](#) and their associated forms and guidance.

Educ8 recognises:

- Timely information sharing is essential to effective safeguarding
- 'Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes' (KCSIE Sept 2023)
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. School staff should be 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.' (KCSIE Sept 2023)
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information

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without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or Deputy DSL), or contact Head of Safeguarding
- Confidentiality is also addressed in this policy with respect to record-keeping in section 9.10, and allegations of abuse against staff in appendix 4

9.4 Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Using [T0017SA Flow Chart for Raising Safeguarding Concerns Template](#) this is personalised and displayed at each site.

9.4.1 If a child is suffering or likely to suffer harm, or in immediate danger

Tell your DSL **immediately**, they will make a referral to children's social care or the police. If a DSL is not available, **make a referral to children's social care and/or the police immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 8) as soon as possible if you make a referral directly.

See Appendix 7 Local Procedures for making a referral, as per the arrangements put in place by the LCSB/3 safeguarding partners

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9.4.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so
- Report via Cause for Concern and hand the signed details to your DSL.

All staff should be 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. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication (KCSIE 23)

9.4.3 If you discover that FGM has taken place or a child is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total

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removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a child has already been subjected to FGM, and factors that suggest a child may be at risk, are set out in appendix 6.

Any regulated health and social care professional or teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **child under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Report via Cause for Concern. Unless they have been specifically told not to disclose, they should also immediately report to DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **child under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a child is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children.

Any member of staff who suspects a child is at risk of FGM or suspects that FGM has been carried out or discovers that a young person **age 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

Local procedures are detailed in Appendix 7

9.4.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 2 in section 9.4.5 illustrates the procedure to follow if you have any concerns about a child’s welfare.

Report using Cause for Concern and where possible, speak to the DSL first to agree a course of action.

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If in exceptional circumstances the DSL or another member of the safeguarding team is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter- agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the site will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Local procedures for early help can be found in Appendix 7

Referral

The DSL will make a referral where appropriate. If the DSL or a member of the safeguarding team is unavailable, you should refer the case to local authority children’s social care or the police. If you make a referral directly, you must tell the DSL as soon as possible. Where a DSL is not available, the Head of Safeguarding should be informed and will be able to support.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

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Local procedures for referral and escalation can be found in Appendix 7.

9.4.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, Report via Cause for Concern and where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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 [Channel](#), 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.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which site staff and governors can call to raise concerns about extremism with respect to a child. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

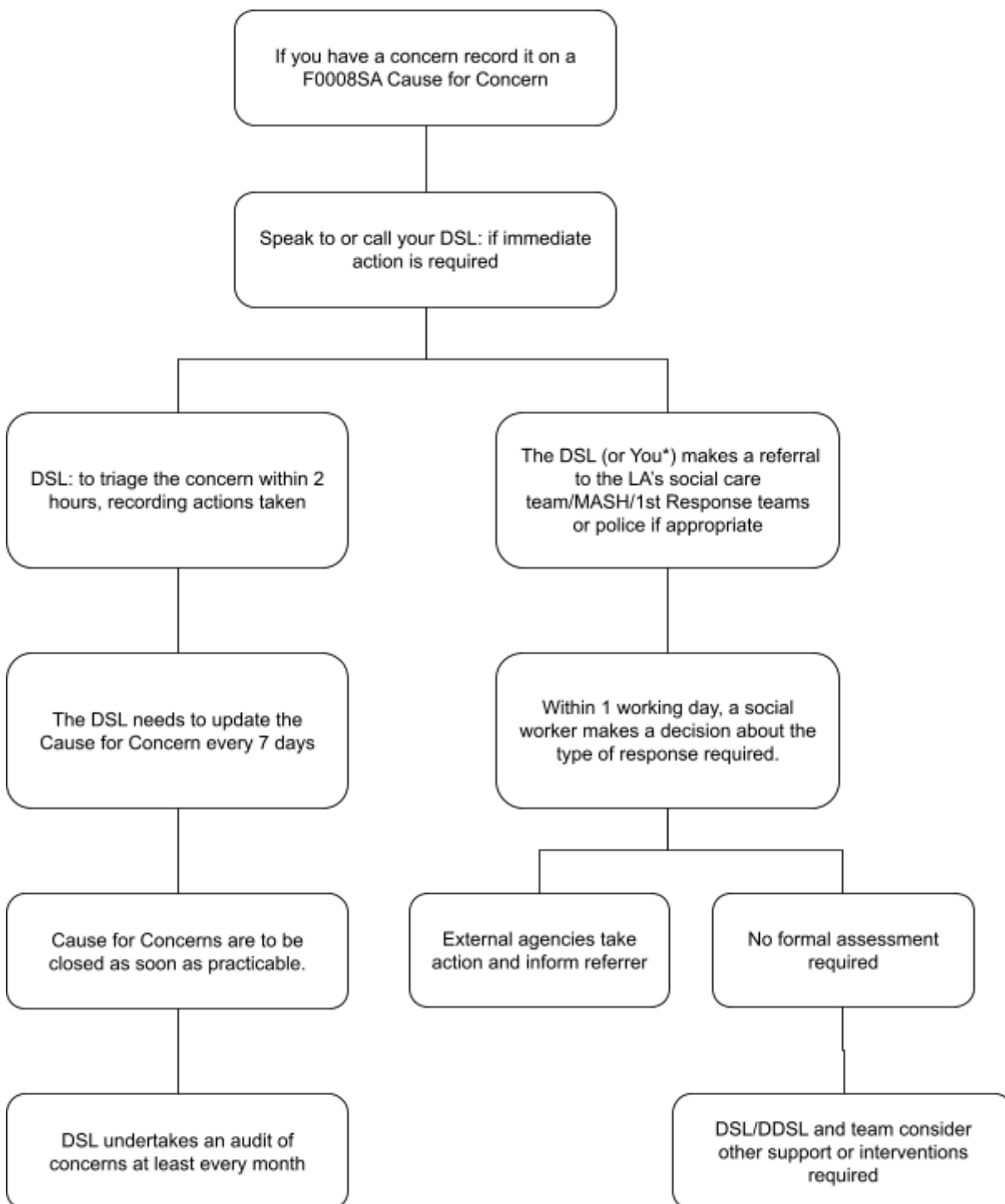
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Figure 2: Procedure if you have concerns about a child's welfare

(as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

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*You can make a referral if DSL/DDSL are unavailable - see section 8



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9.4.6 If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 9.4. (KCSIE Sept 2023)

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action who can refer to your site's local arrangements for identifying and supporting individuals who may have possible mental health problems

9.4.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff (including bank, supply or agency staff) or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the DSL. If the concerns/allegations are about the DSL, speak to the Head of Safeguarding. If concerns/allegations are about the Head of Safeguarding speak to a Responsible Director or Proprietor.

The DSL/Executive Head/Proprietor will then follow the procedures set out in appendix 4, if appropriate.

Where appropriate, the site will inform Ofsted and LADO of the allegation and actions taken, within the necessary timescale (see appendix 4 for more detail).

9.4.8 Allegations of abuse made against other children

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

We also recognise the gendered nature of child on child abuse. However, all child on child abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under our site's behaviour policy, but this child protection and safeguarding

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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 Learners in the site at risk
- Is violent
- Involves Learners being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)
- Use of mobile or smart technology as some learners have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. Educ8 considers how this is managed on our premises and reflects this in our mobile and smart technology policy. This will be supported by an annual risk assessment. (KCSIE Sept 2022)

If a child makes an allegation of abuse against another child/young person:

- You must record the allegation on Cause for Concern and tell the DSL, 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 (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) 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:

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- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils/learners/residents, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate Learners about appropriate behaviour and consent
- Ensuring Learners know they can talk to staff confidentially by displaying posters to reinforce the message, covering this in tutorials, in key worker/support sessions and through PSHE sessions.
- Ensuring staff are trained to understand that a child 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

For further information see Appendix 8.

9.4.9 Sexting

Educ8 bases its policy on guidance from the UK Council for Child Internet Safety for [all staff](#) and for [DSLs and senior leaders](#).

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately and record this on Cause for Concern.

You must **not**:

- View, download or share the imagery yourself, or ask a child to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL Delete the imagery or ask the child to delete it
- Ask the child(ren) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)

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- Share information about the incident with other members of staff, the child(ren) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the child(ren) that they will receive support and help from the DSL

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate site staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to child(ren)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the Learners involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the Learners involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult

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- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the imagery is under 13
- The DSL has reason to believe a child/young person is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher/site lead and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the Learners involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a child/young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the child at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done by following local procedures in Appendix 7.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded using Cause for Concern. The record-keeping

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arrangements set out in section 9.10 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Learners are taught about the issues surrounding sexting as part of our PSHE education programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Learners also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with children and young people so they are aware of the processes the site will follow in the event of an incident.

9.5 Notifying Parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

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9.6 Children and young people with special educational needs and disabilities or physical health issues

We recognise that Learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Learners being more prone to peer group isolation than other Learners
- The potential for Learners with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers KCSIE Sept 2023 has stated that in addition to physical' health' issues mental health conditions may also cause barriers for reporting concerns and this should be taken into consideration.
- Using the SEND register in place Educ8 identifies the additional challenges and assigns extra pastoral support and attention to ensure that appropriate support for communication is in place.' (see [13-9 SEN & Disability Policy](#))

9.7 Children and young people with a social worker

Children and young people may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them susceptible to further harm as well as potentially creating barriers to engagement, attendance to education, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect susceptible children.

Where we are aware that a child/young person has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare, care and educational outcomes. For example, it will inform decisions about:

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- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

9.8 Mobile phones, electronic devices and cameras

Staff are allowed to bring their personal phones and other electronic devices such as tablets, to school/site for their own use, but will limit such use to non-contact time when Learners are not present. Staff members' personal phones and other communication **devices will remain in their bags or cupboards during contact time with Learners.** Staff will not take pictures or recordings of Learners on their personal phones, devices or cameras.

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

Please refer to [14 Acceptable Use & e-Safety within ICT Policy](#)

9.9 Online Safety

The technology used in Educ8 schools are checked regularly by the Executive Board and the Proprietor. Annual updates are conducted on the laptops, tablets and devices to ensure they are safe for use. Educ8 uses the antivirus and internet safety software Bullguard on all Windows operating systems. All Chrome operating systems are enrolled onto the Educ8 Group domain with internet safety filters being part of the enrollment. This provides learners safety when working online. School delivery staff are trained on the software annually to ensure they understand the systems in place, how to manage them effectively.

The School has robust monitoring and filtering systems in place which will:

- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- identify the device and the unauthorised online platform accessed, alerts are sent to the group via email including the network manager.

Incidents are followed up immediately and procedures followed. Where content raises more serious concerns the safeguarding procedures are followed and any further intervention with outside agencies is implemented.

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Information on online safety, the use of technology linked to Educ8's curriculum can be found in the prospectus and at www.educ8group.com, both of which are discussed during the learner interview before joining the school.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, Educ8's Executive Board and proprietor will do all that they reasonably can to limit learners exposure to the above risks from the school's or college's IT system (KCSIE 2023)

Further information can be found in [14 Acceptable Use & e-Safety within ICT](#)

9.9 Complaints and concerns about site safeguarding policies

9.9.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 4).

9.9.2 Other complaints

Other complaints will be handled in accordance with 6 Complaints Policy

9.9.3 Whistleblowing

Please refer to 2-7 Whistleblowing policy

General guidance can be found at: Advice on whistleblowing <https://www.gov.uk/whistleblowing>. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

9.10 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 on Cause for Concern. If

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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 only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for an appropriate period of time after they have left the provision in order to allow us to meet our statutory obligations.

If a child for whom the site has, or has had, safeguarding concerns moves to another site, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main child's file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school/college/home and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- Records are kept electronically using Cause for Concerns
- All staff may report on Cause for Concern and access their records. Access to all other aspects of the system are restricted to those holding a safeguarding role in the site (DSL/Deputy DSL/Responsible Directors/Head of Safeguarding)
- The Cause for Concern system has security assurances built in and access is secured by password
- The DSL shares information with other agencies verbally or by encrypted email when this is appropriate.

8.11 Cause for Concern

All concerns should be logged on the [F008SA Cause for Concern](#) form as soon as possible. Full details of how to use the system can be found on the Cause for Concern system and within this policy.

All site staff must ensure they know how to log and update a concern.

The DSL and deputies must ensure they know how to update, monitor, review and close a concern and how to identify and analyse patterns and trends.

When a concern is logged an email alert is sent by the system to the named site DSL and deputies

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New concerns should be triaged by the DSL or a deputy within 2 hours during site hours wherever possible, or as soon as possible out of hours. When triaged, the case will move to the open category. The DSL should assign a case owner and identify categories of concern and record any actions taken.

Open cases should be reviewed frequently and updated at least weekly

Open cases should be closed as soon as is practical

The use of Cause for Concern will be monitored by the Educ8 Safeguarding Governance Board on a monthly basis

In addition:

- Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Further information available in Appendix 1

9.12 Training

9.12.1 All Staff

Educ8 are committed to ensure that 'the training that staff receive 'including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.' The CPD programme will be reviewed to ensure that all the knowledge staff need is included and, perhaps more importantly, that they understand how it is to be implemented.

All staff members must undertake safeguarding and child protection training at induction, including on whistle- blowing procedures, to ensure they understand the site's/school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and local updates will be in line with advice from the LCSB/ 3 safeguarding partners.

Through training all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily

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life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic 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.' (KCSIE Sept 2023)

All staff will have training on the government's anti-radicalisation strategy, [Prevent](#), to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This includes being 'susceptible' to being drawn into terrorism, rather than 'vulnerable to being drawn into terrorism

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e- bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

9.12.2 The DSL and Deputies

The DSL and deputies will undertake level 3 child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). Where possible Aurora recommends DSLs and Deputies attend Local Authority training.

They will also undertake Prevent awareness training.

9.12.3 The Executive Board

Educ8's Executive Board and proprietors will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction.

This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding.

Their training should be regularly updated.

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As a Responsible Director may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the Head of School, they receive training in managing allegations for this purpose.

9.12.4 Recruitment - interview panels

At least one person conducting any interview for a post at the site will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

9.12.5 Staff who have contact with children and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

10. Metrics

To support the Annual Review a number of metrics are obtained:

- Total No. of concerns raised
- Concerns raised per site
- Concerns raised per functional area

11. Quality Records

The following Quality Records shall be generated and managed in accordance with Doc. 10:

Required Record	Custodian
Training Records	Deputy Executive Head
Completed Flow Chart for Raising Safeguarding Concerns Template	DSL
Completed Cause for Concerns	Head of Safeguarding

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12. Form(s)/Template(s)

The following form(s)/template(s) are required for this document:

Form Number	Title
T0017SA	Flow Chart for Raising Safeguarding Concerns Template
F0014SA	KCSIE & Safeguarding Declaration
F0008SA	Cause for Concern

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APPENDIX 1 - Cause for Concern

Cause for Concern allows anyone responsible for the protection of children, young people and adults at risk to easily manage and record all safeguarding and wellbeing concerns. Cause for Concern also helps to protect those at risk by allowing early intervention using a secure and intuitive mechanism. It also provides safeguarding leads with the peace of mind by meeting the statutory, legal and moral obligations they have to those in their care.

The Cause for Concern system provides each school's DSL with simple, secure recording and case management, customised reports, automated chronologies, lessons learned and document sign off. This is achieved using the [F008SA Cause for Concern](#) form.

Do not allow the completion of the incident to delay notification of the concerns to the DSL but discuss and share the completed form with the DSL, Head of Safeguarding, a Manager or a Responsible Director as appropriate, as a matter of urgency.

The Head of Safeguarding is Deborah Payne. The DSL for each school is the Head of School.

The LADO details for your site are displayed on the notice board.

If for any reason you are not able to speak to the onsite DSL or **the Head of Safeguarding** you should speak to the Director of Safeguarding or another Board member (see 8.2 Key Contacts). If there is an immediate emergency, dial 999 and report the matter to the police.

When completing the a Cause for Concern remember:

- Ask "open" questions and not leading questions, that is, a question which suggests its own answer
- Listen carefully and keep an open mind
- Do not take a decision as to whether or not the alleged abuse or neglect has taken place
- Do not promise confidentiality
- Enter all the admin details, including date of birth (we are asked for this when we report a record to Children's Services or the police)
- Include your full name (not initials)

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- Make sure the record is given in detail, preferably in the child's own words
- Don't report what other people have told you - they must write their own record form
- Only write about one child on each record form (use a separate form for each child)
- Remember that record forms are used in court cases and inquests as primary documents, so they must be complete and accurate.
- Your DSL must be notified when you have completed your Cause for Concern
- Finally, please sign, date and time the record form.

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APPENDIX 2 - Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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 or not 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
- 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)

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Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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 of 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 care-givers)
- Ensure access to appropriate medical care or treatment

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

Annex A of Keeping Children Safe in Education contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

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APPENDIX 3 - Safer Recruitment and Vetting

For further information please see [2-5 Safer Recruitment](#)

We will record all information on the checks carried out in the site's Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

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 not keep a copy of this for longer than 6 months
- 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
- Only obtain a curriculum vitae (CV) alongside the application form. A CV is not sufficient on its own to support our safer recruitment process
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional online 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, and criminal records checks or their equivalent
- 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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

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We will seek references on candidates, upon offer of a role. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If allegations have been made 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 susceptible adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or susceptible adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party workers

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. When using agency workers we will add them to the SCR. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

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We will ensure that any contractor, or any employee of the contractor, who is to work at the site 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 or they will show their DBS prior to and on entry

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 prior to their arrival at the site and the age appropriateness of what is going to be delivered and whether relevant checks will be required. (KCSIE Sept 2023)

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Staff acting in a Governance Role:

Will have an enhanced DBS check without barred list information.

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They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state. All governors/executive board members will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise learners on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a child under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

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APPENDIX 4 - Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

This section of this policy applies to all cases in which it is alleged that a current member of staff including bank, agency, supply staff, or volunteer has:

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

It applies regardless of whether the alleged abuse took place in the site. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school/site so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the site so that they do not have unsupervised access to children

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- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative site or other work for the Group.

Definitions for outcomes of allegation investigations by LADO

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the head of school/site lead (or Executive Head) where the head of school/site lead is the subject of the allegation) – the ‘investigating manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the site is

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justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, and the HR Department as appropriate

- **If immediate suspension is considered necessary**, agree and record this on the suspension checklist with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern, and the individual will be given a named contact at the site and their contact details
- Ensure you alert the HR Department as to the concerns/allegations so that they may advise you on suspension and the subsequent investigation in line with Educ8's Disciplinary Policy.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in site and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence) Advice on how to do this will be provided by the HR Department in order to ensure we follow data protection guidelines.
- Referral to Disclosure and Barring Service (DBS)
- Educ8 have a duty to refer a matter to the DBS if a decision has been made to dismiss or remove a person from working in a regulated activity. This will be after the matter has been investigated (and normally after it has been heard through

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Educ8's Disciplinary procedure) as the DBS rely upon referral evidence in order to make their decision. Should the person leave prior to the investigation being completed and/or the matter being heard, Educ8 will complete their disciplinary processes and if they have sufficient information to meet the referral duty criteria, will refer.

- Should Educ8 still have safeguarding concerns about a person, even though they have not been removed from regulated activity after following our internal processes, it will make a referral to the DBS with the information to support those concerns.
- Always close attention will be paid to the most up to date referral duty criteria given by the DBS and advice and guidance will be sought from them if there is any doubt.

If the school/site is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the Site Lead or Executive Head will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's/site's disciplinary process, should this be required at a later point.

Low Level Concerns (KCSIE 2023)

'The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples being of such 'low-level' concerns which 'could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a

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closed door; or,

- using inappropriate sexualised, intimidating or offensive language.

Additional considerations for supply or agency staff

If there are concerns or an allegation is made against someone not directly employed by the site, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures:

- We will not decide to stop using a supply teacher/staff member due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The Executive Head will discuss with the agency whether it is appropriate to suspend the supply teacher/staff member, or redeploy them to another part of the site, while the site carries out the investigation
- We will involve the agency fully, but the site will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

In all cases where an allegation is made we will endeavour to investigate, act upon and resolve as quickly as possible. Specific timescales cannot be given as actions and decisions can only be made as a result of full investigation which is dependent on factors outside Educ8 control.

Specific actions:

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

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Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the site ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the HR Department will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of a professional body, such as a teacher or a nurse, the case manager and the regional HR Department will refer the matter to the appropriate body i.e. Teaching Regulation Agency, NMC

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the site.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher/site lead, or other appropriate person in the case of an allegation against the head of school/site lead, will consider in conjunction with the HR Department, whether any disciplinary action is appropriate against the child(ren) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a member of the site.

Confidentiality

The site will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

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Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the site will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are substantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the site's procedures or practice to help prevent similar events in the future. Learning from all allegations against staff investigations should be incorporated by schools and colleges, not just from those that are concluded and substantiated.

Sharing Low Level Concerns

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If Educ8 and its colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with their LADO.

Educ8 will create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could

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be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

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APPENDIX 6 - Specific safeguarding issues

Annex A of Keeping Children Safe in Education contains important additional information about specific forms of abuse and safeguarding issues. Those staff who work directly with children, site, school and college leaders and should read this annex.

Children absent from education (KCSIE 2023)

A child that is absent from education, particularly on repeat occasions or for prolonged periods. This can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become absent from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
Come from the families of service personnel
Go missing or run away from home or care
Are supervised by the youth justice system
Cease to attend a school/college
- Come from new migrant families

We will follow our procedures (see [2-1 Attendance Policy \(including children absent in education\)](#)) for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions or for long periods, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

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Child criminal exploitation:

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Absent for periods of time or regularly coming home late regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or 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). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. (KCSIE 23)

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult at the site (usually the designated safeguarding lead) before the child or children arrive at school the

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following day or is returned to residential care after a break where police forces are part of [Operation Encompass](#). See Appendix 7 for your local safeguarding arrangements.

The DSL will provide support according to the child's needs and update records about their circumstances.

Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as susceptible as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. At Educ8, staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff or key workers.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse. (KCSIE 23)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If

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staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 9.4.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a child is at risk of FGM.

Indicators that FGM has already occurred include:

- A child/young person confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/child already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school/college, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a child/young person may be at risk of FGM include:

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- The girl’s family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl’s community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school/college
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into 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 into a marriage. Threats can be physical or emotional and psychological.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced

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marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a child is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the child about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the child to an education welfare officer, pastoral tutor, learning mentor, or counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **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 of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. This includes being ‘susceptible’ to being drawn into terrorism, rather than ‘vulnerable to being drawn

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into terrorism. The DSL will undertake [Prevent awareness training](#) and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our site being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our children and young people to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in children's behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a child is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a child or young person, they will follow our procedures set out in section 8.4 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the site's/school's measures to prevent radicalisation are set out in local procedures and group policies including [2-9 Preventing Extremism and Radicalisation Policy](#).

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the site who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and provide confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the site any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using site facilities is not seeking to disseminate extremist views or radicalise children or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will make every effort to contact alternative emergency contacts and ascertain reasons for the missed collection. If contact cannot be made staff will remain with the child and make contact with the duty social work team to make a referral and seek advice.

Missing children

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Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow local procedures and individual support plans where appropriate.

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APPENDIX 7 - Local Procedures: [Your Area]

Concern		Contact Details
FGM	<p>If you are concerned that FGM has taken place: As a teacher, report to the Police immediately. All other staff report to DSL immediately.</p> <p>If you are concerned that FGM may have taken place or might be about to: All staff to report to DSL</p>	<p>Police: 101 or 999</p> <p>DSL: [Name] [Mobile #]</p>
Children's Social Care Referrals	[Area 1]	[Contact details]
	[Area 2]	[Contact details]
Child Sexual Exploitation	[Area 1]	[Contact details]
	[Area 2]	[Contact details]
Forced Marriage Unit		020 7008 0151
Modern Slavery Helpline		0800 012 1700
Human Trafficking		https://www.gov.uk/government/publications/human-traffickingvictims-referral-and-assessmentforms
Child Exploitation and Online Protection		www.ceop.police.uk/safety-centre
Local Area Safeguarding Children Procedures		[Web link]
Harmful Online Challenges and online hoaxes		https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes
Operation Encompass		https://www.operationencompass.org/

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APPENDIX 8 - Child-on-child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. Schools and colleges should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

It is essential that 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 school or college should not be downplayed and should 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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Schools should remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child’s distress is.

Educ8 Group will be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a

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local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.