

Safeguarding & Child Protection Policy

Document number:	2
School:	<i>Coventry and Warwickshire</i>
Issue:	4.6
Owner:	<i>Group Safeguarding Lead</i>
Approved by:	<i>The Executive Board</i>
Effective date:	<i>3 September 2025</i>
Next review due by:	<i>15 August 2026</i>

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 2 of 85

1. Contents

1. Contents	2
2. Issue and Revision History	4
3. Summary	10
4. Document Release	11
5. Purpose	11
6. Scope	14
7. Definitions and Acronyms	15
8. Important Contacts	17
8.1 Other Contacts	17
9. Policy	18
9.1 Equality Statement	18
9.1.1 Human Rights	19
9.2 Roles and responsibilities	19
9.2.1 All Staff	19
9.2.2 The Designated Safeguarding Lead (DSL)	22
9.2.3 The Head of Safeguarding	24
9.2.4 The Director of Safeguarding	25
9.3 Confidentiality and Information Sharing	26
9.4 Recognising abuse and taking action	27
9.4.1 If a child is suffering or likely to suffer harm, or in immediate danger	28
9.4.2 If a child makes a disclosure to you	28
9.4.3 If you discover that FGM has taken place or a child is at risk of FGM	29
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)	30
9.4.5 If you have concerns about extremism	31
Figure 2: Procedure if you have concerns about a child's welfare	32
9.4.6 Mental Health, Wellbeing	34
9.4.7 Concerns about a staff member or volunteer	34
9.4.8 Allegations of abuse made against other children	35
9.4.9 Sexting	36
9.4.10 Children Absent from Education	40
9.5 Notifying Parents	40
9.6 Specific Safeguarding Issues / Vulnerable Children	41
Children with Special Educational Needs, Disabilities, or Health Issues	41
Children with Family Members in Prison	41
Private Fostering Arrangements	41

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 3 of 85	

9.7 Children and young people with a social worker	42
9.8 Mobile phones, electronic devices and cameras	42
9.9 Online Safety	43
9.9 Complaints and concerns about site safeguarding policies	45
9.9.1 Complaints against staff	45
9.9.2 Other complaints	45
9.9.3 Whistleblowing	45
9.10 Record-keeping	46
9.11 Reporting Safeguarding Concerns and Incidents	46
9.12 Training	47
9.12.1 All Staff	47
9.12.2 The DSL and Deputies	48
9.12.3 The Executive Board	48
9.12.4 Recruitment - interview panels	49
9.12.5 Staff who have contact with children and families	49
10. Metrics	49
11. Quality Records	50
12. Form(s)/Template(s)	50
APPENDIX 1 - CPOMS Safeguarding Recording, Monitoring, and Case Management	51
APPENDIX 2 - Types of Abuse	53
APPENDIX 3 - Safer Recruitment and Vetting	55
APPENDIX 4 - Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors	59
APPENDIX 6 - Specific safeguarding issues	67
APPENDIX 7 - Local Procedures: [Your Area]	78
APPENDIX 8 - Child-on-child sexual violence and sexual harassment	80
Appendix 9 Operation Encompass	82
Appendix 10 Summary of Educ8 Safeguarding & Child Protection Policy	84

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 4 of 85

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
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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 5 of 85

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 Appendix 3 UPDATES: Criminal Exploitation and County Lines, DfE's What to do if you're worried a child is being abused (March 2015)	Debbie Payne	07/08/19
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	Debbie Payne	31/01/21

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 6 of 85

	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. Suitability of staff working with young people and volunteers.		
4.0	Annual Review and rewrite for ISS Lead tutor replaced with Head of School Lead Instructor replaced with Head of School Update to Key Contacts - Central Management. KCSIE Update Sep 21 Addition of My Concern Summary - Reporting systems have a whole school approach. 5 Purpose: - Good safeguarding requirements 9.12 The requirement for Online training and that technology is a significant component to safeguarding. Appendix for part 4: Low level concerns 9.3 Confidentiality - Information sharing. 9.4.6 Mental health concern about a child is also a safeguarding concern. 9.4.8 Use of mobile and smart technology to share indecent images. 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.	Deborah Payne	01/09/21

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 7 of 85

	Appendix 3 Safer recruitment update on visiting professionals		
4.1	Annual Review - KCSIE update 2022 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. 9.1 Equality Statement updated as per KCSIE 2022; addition of Human Rights 9.4.2 Addition to disclosure information as per KCSIE 2022 9.4.4 Addition of Cause for Concern 9.4.8 Terminology change - Peer on Peer changed to Child on Child 9.4.9 Addition of Cause for Concern 9.8.1 Re-write to section Online Safety 9.12.3 Updated section as per KCSIE 2022 11 & 12 Remove Safeguarding Record Form Appendix 3 - Update to appointment list for new staff 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'.	Deborah Payne	17/08/2022

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 8 of 85	
	Appendix 6 - Updated section 'Domestic Abuse'; Added section 'Children who are lesbian, gay, bi, or trans (LGBT)' Appendix 7 - Added contact details for 2 additional agencies.		
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	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 All references to MyConcern replaced with Cause for Concern KCSIE 2023 Updates: 9.9 Update regarding filtering and monitoring Guidance about 'children missing in education' has been replaced with 'children who are absent from education for prolonged periods and/or repeated occasions.' Children who may be 'vulnerable' has been replaced with children who may be 'susceptible'. Appendix 6 - update Forced Marriage - Reflects change in law from February 2023, Terrorism - This includes being 'susceptible'	Debbie Payne	29/08/23

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 9 of 85	
4.4	Updated guidance Working Together to Safeguard Children December 2023. Added 'Working together to safeguard children 2023: statutory guidance', 'Working together to safeguard children: summary of changes' and 'Working together to safeguard children: statutory framework'. Addition of sharing nudes and sem-nudes guidance	Debbie Payne	01/04/24
4.5	Annual Update KCSIE 2024 - update language from 'abuse and neglect' to 'abuse, neglect and exploitation' throughout policy. 5. Purpose - updated definition and aims 8. Important Contacts - rewrite of paragraph 'in the event of an allegation' 8.1 addition of Guidance - Sharing nudes and semi- nudes, and Information Sharing Guidance 9.2.2 Bullet 3 - update with Safeguarding Tracker 9.2.3 Bullet 4 - addition of 'act as case manager for allegations against DSL or DDSL' 9.4.4 Additional paragraph within 'Early Help' Addition of documentation requirements 9.4.5 Fig. 2 - updated 9.7 Bullet 1 - reworded 8.11 Paragraph 2 - inclusion of additional instruction for completing the Safeguarding Tracker Appendix 1 - general update and reword	Debbie Payne	26/08/24

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 10 of 85
	Appendix 6 - inclusion of LGBGQ • inclusion of LGBGQ • Updated County Lines • updated Child Criminal Exploitation • Updated Child Sexual Exploitation Added Appendix 9 Operation Encompass explanation of steps taken.		
4.6	Update from KCSIE 2025 Summary refined Scope updated CPOMS has been updated throughout the policy to replace the legacy Cause for Concern system. reword 9.6 to read Specific Safeguarding Issues / Vulnerable Children to include a child with family members in prison. A child in private fostering 9.9 Misinformation, Disinformation, Conspiracy Theories 9.11 Title change 'Reporting Safeguarding Concerns and Incidents' updated with CPOMS MIS procedure Addition of Appendix 10 Policy Summary	Debbie Payne	03/09/25

3. Summary

Educ8 is committed to safeguarding and promoting the welfare of every learner. Safeguarding is the responsibility of all adults in our community, including staff, volunteers, contractors, and governors, and applies both on and off site. We expect everyone working with or for Educ8 to remain vigilant, to recognise the signs of abuse or neglect, and to take timely action when concerns arise.

This policy sets out the systems and procedures that support a whole-school approach to safeguarding, in line with Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023. It ensures that appropriate mechanisms are in place to help staff understand and discharge their responsibilities and that children know how to raise concerns, confident that they will be listened to and taken seriously.

All concerns must be reported promptly to the Designated Safeguarding Lead (DSL)

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 11 of 85

and recorded on CPOMS. If a member of staff is dissatisfied with the way a case is being managed, they should remember that anyone has the right to make a direct referral to children's social care or the police.

At Educ8, we aim to foster a culture of safeguarding where the best interests, wishes, and feelings of the child are central to every decision. We also recognise our duty of care to staff and volunteers, and the importance of providing them with clear systems, effective training, and strong leadership to enable them to safeguard effectively.

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.

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. Working Together to Safeguard Children 2023' In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred, which means keeping the child focus when making decisions about their lives and working in partnership with them and their families, including a regard for contextual safeguarding.

Safeguarding and promoting the welfare of children is defined in the DfE's KCSIE 2025 as:

- Providing help and support to meet the needs of children as soon as they emerge
- protecting children from maltreatment whether that is within or outside the

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 12 of 85

home, including online

- preventing the impairment of children's mental and physical health or development
- making sure that children grow up in circumstances consistent with the provision of safe and effective care, and promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement wherever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes

Every pupil should feel safe and protected from any form of abuse which, in this policy, means protection from multiple harms including any kind of physical abuse, emotional abuse, sexual abuse, neglect and exploitation child on child abuse, exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation, criminal exploitation, serious youth violence and the influences of extremism leading to radicalisation.

Working Together to Safeguard Children 2023' All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs. Extra familial harm is harm that occurs to children outside of their family and often occurs during adolescence. We recognise the impact of witnessing ill treatment of others and understand the need for support for intra familial harms and any necessary support for siblings following incidents.

Safeguarding and promoting the welfare of children. There is an important distinction between safeguarding children who have suffered or are likely to suffer significant harm (where cases should be reported to Children's Social Care immediately) and action required to promote the welfare of children in need of additional support even if they are not suffering harm or are at immediate risk.

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
- We are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 13 of 85

- Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.
- We will always act in the best interest of the child.
- Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered 'that sometimes children will 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. This should not prevent staff from having a professional curiosity and report to the DSL
- All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation

Legislation and statutory guidance:

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education 2025](#) and [Working Together to Safeguard Children 2023](#), 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
- [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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 14 of 85

- 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 members of the school community, including staff, volunteers, contractors, visiting or part-time staff (such as coaches), and those acting in a governance capacity. It applies across the school site and during all off-site and extended activities, such as educational visits or trips.

The School's Governors are responsible for ensuring appropriate mechanisms are in place to support staff in understanding and discharging their safeguarding responsibilities.

In line with Keeping Children Safe in Education and the Children Act 2004 (as amended by the Children and Social Work Act 2017), the following three safeguarding partners make arrangements to work together to safeguard and promote the welfare of local children:

- The local authority (LA)
- The integrated care board (ICB) for the area covered by the LA
- The chief officer of police for the police area within the LA area

Our policy and procedures are consistent with those of the Local Safeguarding Children Partnership (LSCP) in the area where they are applied.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 15 of 85

Safeguarding and promoting the welfare of children is the responsibility of every adult in our community. All staff are expected to remain vigilant, to recognise potential signs of abuse, and to report any concerns directly to the Designated Safeguarding Lead (DSL). If a member of staff feels a case is not being managed appropriately, they should remember that anyone may make a referral to children's social care.

At Educ8, we are committed to fostering a culture of safeguarding and to acting in the best interests of every child at all times, while also recognising our duty of care towards staff and volunteers.

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 failed to be controlled using risk reduction controls.
DSL	Designated Safeguarding Lead. This is 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.
Children	Anyone under the age of 18
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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 16 of 85

SPA	Team within the local authority providing a Single Point of Access for reporting concerns
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
CPOMS	Child Protection Online Monitoring Service is a software system that helps schools and other educational institutions record and manage information related to safeguarding, pastoral care, and pupil welfare. It allows all staff members to log any concerns they have about a pupil's safety or wellbeing, creating a central, secure record that generates a comprehensive chronology for individual students.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 17 of 85

8. Important Contacts

Role / Organisation	Name	Contact details
Head of School / Designated Safeguarding Lead (DSL)	Anthony Allen	024 7736 0053 07931 938089
Deputy DSL	Jordan Roberts	024 7736 0053
Out of hours contact:	Deborah 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 DSL, you should contact the Educ8 Head of Safeguarding.

An allegation against the Educ8 Head of Safeguarding, Executive Head, Proprietor, or Deputy Executive Head should be reported using [2-7 Whistleblowing Policy](#).

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 18 of 85

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
Department for Education	0207 340 7264
Independent Provisions Inspectorate	0207 6000100
Refuge: National Domestic Abuse Helpline	0808 2000 247
Operation Encompass: Teacher Helpline (Advice from an Educational or Clinical Psychologist about how best to support children who may be experiencing abuse) See Appendix	operation encompass 0204 513 9990 Monday to Friday, 8am-1pm
Guidance - Sharing nudes and semi- nudes: how to respond to an incident. (UKCIS) (published March 2024) Mostly related to images created by Artificial Intelligence (AI)	Guidance
Information sharing - advice for practitioners providing safeguarding services for children, young people, parents and carers	Guidance

All staff should follow the procedures in this policy if they have concerns about a child and speak to the member of staff identified as DSL or the DDSL in her absence. However, all adults have the right to contact Social Services direct via the contacts listed below should they not be satisfied with the actions of the designated persons.

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 19 of 85

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.
- 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
- 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](https://www.equalityhumanrights.com)).

9.2 Roles and responsibilities

9.2.1 All Staff

All staff will read and understand Part 1 and Annex A & B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2025](#) and review this guidance at least annually, undertaking annual online KCSIE training.

All staff will be aware of:

Policy Educ8	Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy	Page #: 20 of 85	

Types of referral

Referral procedures will vary depending on the nature of the concern or disclosure:

1. **Child at risk of significant harm (not involving staff):**

- Where a child has suffered or is at risk of significant harm, a referral will be made to **Children's Social Care in the area where the child lives**, within 24 hours.
- If the initial referral is made by telephone, the Designated Safeguarding Lead (DSL) will confirm this in writing within 24 hours.
- If no acknowledgement is received within 3 working days, the DSL will follow up with Social Care.

2. **Concerns about staff suitability:**

- Where there are concerns about a member of staff's suitability to work with children, a referral will be made to the **Local Authority Designated Officer (LADO)** within 1 working day.
- The Head of Safeguarding and DSL will not make judgments about borderline cases; if there is doubt, advice will be sought from the LADO or Children's Social Care (without initially identifying the family).

3. **Children in need of additional support (but not at risk of immediate significant harm):**

- The DSL will refer the child to **Children's Social Care** in the local authority where they live.
- Where support from more than one agency would benefit the child and family (e.g. health, housing, police), an **Early Help assessment** will be considered and coordinated by Children's Services.
- The school will work collaboratively with safeguarding partners and other relevant agencies.

Policy Educ8	Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy	Page #: 21 of 85	

4. **Mental health concerns:**

- Where a disclosure relates to a pupil's mental health, and they are at risk of harm from themselves rather than others, the DSL will work with parents and carers to support the pupil's wellbeing.
- Where appropriate, and with consent, a referral may be made to **Emotional Wellbeing and Mental Health Services (EWMHS) or CAMHS**.

5. **Radicalisation:**

- Where there are concerns that a child is at risk of radicalisation, the referral process outlined above will be followed.
- In addition, a referral may be made to the **Channel programme**. While parental consent may be sought in some cases, the school will proceed without consent if there are reasonable grounds to believe the child is at significant risk of harm.

All staff must be aware of, and act in accordance with, the school's safeguarding systems, including:

- This safeguarding and child protection policy
- The staff code of conduct
- The role and contact details of the DSL and Deputy DSLs
- The behaviour policy
- The safeguarding response for children who are missing from education
- The school's online safeguarding systems

In addition, all staff should:

- Understand the **Early Help process**, including their role in identifying problems early, liaising with the DSL, and sharing information with other professionals.
- Know the process for making referrals to local authority children's social care and the statutory assessments that

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 22 of 85

may follow.

- Know what to do if they identify a safeguarding issue or if a child makes a disclosure of abuse or neglect, including how to maintain appropriate confidentiality while liaising with relevant professionals.
- Be able to recognise the signs of different forms of abuse, neglect, and exploitation, including **child sexual exploitation (CSE), female genital mutilation (FGM), serious violent crime, 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 for this school is the Head of School. Full contact details are provided in Section 8 of this policy. The DSL has overall lead responsibility for child protection and wider safeguarding across the school.

Availability:

- During term time, the DSL will be available during school hours for staff to raise and discuss safeguarding concerns.
- Out-of-hours contact arrangements are set out in Section 8.
- When the DSL is absent, safeguarding duties will be carried out by the Deputy DSLs (listed in Section 8).
- If neither the DSL nor deputies are available, the Head of Safeguarding will provide cover, including during out-of-hours or out-of-term activities.

Support for the role:

The DSL will be provided with sufficient time, funding, training, resources, and support to fulfil their responsibilities effectively.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 23 of 85

Core responsibilities include:

- Offering advice, guidance, and training to staff on child welfare and child protection matters.
- Participating in (or supporting staff to participate in) strategy discussions and inter-agency meetings.
- Contributing to the assessment of children.
- Referring suspected cases to the relevant agency (local authority children's social care, the Channel programme, the Disclosure and Barring Service, and/or the police).
- Supporting staff who make referrals directly.
- Ensuring new cases are triaged within 2 hours wherever possible, with open cases reviewed at least weekly, and updates clearly recorded.
- Making sure that, when a case is closed, records are complete, actions are robust, and outcomes are clear.
- Keeping the Executive Head and Head of Safeguarding informed of significant issues.
- Liaising with local authority case managers and the Local Authority Designated Officer (LADO) as appropriate.

Wider responsibilities include:

- Ensuring all staff, including temporary staff and volunteers, are informed of the school's safeguarding systems during induction.
- Communicating this safeguarding and child protection policy to parents/carers on admission and publishing it on the school website.
- Ensuring all staff receive regular safeguarding and child protection training and updates.
- Acting as the case manager for allegations against

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 24 of 85

staff or volunteers, where appropriate (see Appendix 4).

- Ensuring that statutory staffing ratios are met where required.
- Carrying out the full range of responsibilities as set out in the DSL and Deputy DSL job descriptions.

9.2.3 The Head of Safeguarding

The Head of Safeguarding has overall responsibility for ensuring that safeguarding arrangements across the school are effective, compliant with statutory requirements, and consistently applied.

Their responsibilities include:

- Policy oversight and compliance:
 - Approving local safeguarding procedures at each review to ensure they remain compliant with legislation and statutory guidance.
 - Holding the Head of School and DSL to account for the effective implementation of this policy.
- Monitoring and governance:
 - Monitoring the effectiveness of safeguarding procedures in partnership with those carrying out governance responsibilities at the site (note: this individual will always be separate from the DSL).
 - Reviewing all safeguarding incident records on a monthly basis, challenging DSLs where records are not up to date or indicate non-compliance.
- Case management:
 - Acting as the case manager where an allegation of abuse is made against a DSL or Deputy DSL, in line with statutory guidance (see Appendix 4).
- Governance responsibilities:
 - Ensuring that those with governance roles are familiar with their duties under *Keeping Children Safe in Education*

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 25 of 85

(KCSIE).

- Supporting governors in fulfilling their responsibilities as set out in part two of KCSIE 2025.

9.2.4 The Director of Safeguarding

The Director of Safeguarding provides strategic oversight of safeguarding across the organisation, ensuring compliance with statutory guidance and holding operational leads to account.

Key responsibilities include:

- **Policy approval and compliance:**
 - Approving this safeguarding policy at each review to ensure it aligns with current legislation, statutory guidance, and best practice.
 - Holding the Head of Safeguarding accountable for implementing the policy effectively.
- **Monitoring and assurance:**
 - Monitoring the overall effectiveness of safeguarding procedures across all sites and educational provisions.
 - Reviewing safeguarding incident records on a termly basis, ensuring they are accurate, up to date, and demonstrate compliance with safeguarding standards.
 - Challenging and holding the Head of Safeguarding to account where records or practice indicate non-compliance
- **Governance and accountability:**
 - Reporting safeguarding performance, trends, and any concerns to the board of trustees/governors, ensuring safeguarding remains a standing agenda item.
 - Ensuring that governance arrangements, including oversight of the DSL and Head of Safeguarding, are robust and effective.
 - Supporting trustees/governors in understanding their

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 26 of 85

statutory responsibilities under KCSIE 2025, including the requirement to read and act on guidance

- **Strategic oversight:**

- Ensuring the school's safeguarding culture prioritises the welfare of children and young people.
- Coordinating with safeguarding partners, regulators, and external agencies where required.

9.3 Confidentiality and Information Sharing

The school 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.

Key principles recognised by the school:

1. Timely information sharing is essential to safeguarding

- Information sharing is crucial in identifying and addressing all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including their educational outcomes.
- Schools have clear statutory powers to share, hold, and use information for safeguarding purposes.

2. Fears about sharing must not prevent safeguarding

- Concerns about confidentiality must not prevent staff from acting in the child's best interests.
- Staff should proactively share information as early as possible to help identify, assess, and respond to risks or concerns about a child's safety and welfare, whether at the early stages of a concern or when a child is already known to local authority children's social care.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 27 of 85

3. Legal framework supporting information sharing

- The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information where it is necessary to keep children safe.
- Where staff need to share special category personal data, the DPA 2018 provides a processing condition for the safeguarding of children and individuals at risk. This allows practitioners to share information without consent if:
 - It is not possible to gain consent, or
 - It cannot reasonably be expected that consent will be obtained, or
 - Gaining consent would place a child at risk.

4. Promoting transparency and safeguarding best interests

- Staff must never promise a child that they will keep a report of abuse confidential, as this may not be in the child's best interests.
- The government's Information Sharing Advice for Safeguarding Practitioners provides seven "golden rules" to guide decision-making about sharing information and supports staff in acting safely and legally.

5. Support and guidance for staff

If staff are in doubt about whether to share information, they should consult the DSL or Deputy DSL, or contact the Head of Safeguarding.

6. Further guidance within this policy

- Confidentiality in relation to record-keeping is detailed in Section 9.10.
- Confidentiality in relation to allegations of abuse against staff is addressed 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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 28 of 85

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

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 CPOMS

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 29 of 85

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 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.

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 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 CPOMS. 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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 30 of 85

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 via CPOMS and where possible, speak to the DSL first to agree a course of action.

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 you think a child, young person or a family might benefit from extra support, you should record any concerns and speak to your nominated child protection lead) Providing help and support to meet the needs of children as soon as problems emerge is crucial (Working together to Safeguard Children 2023).

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 31 of 85

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.

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 CPOMS 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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 32 of 85

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.

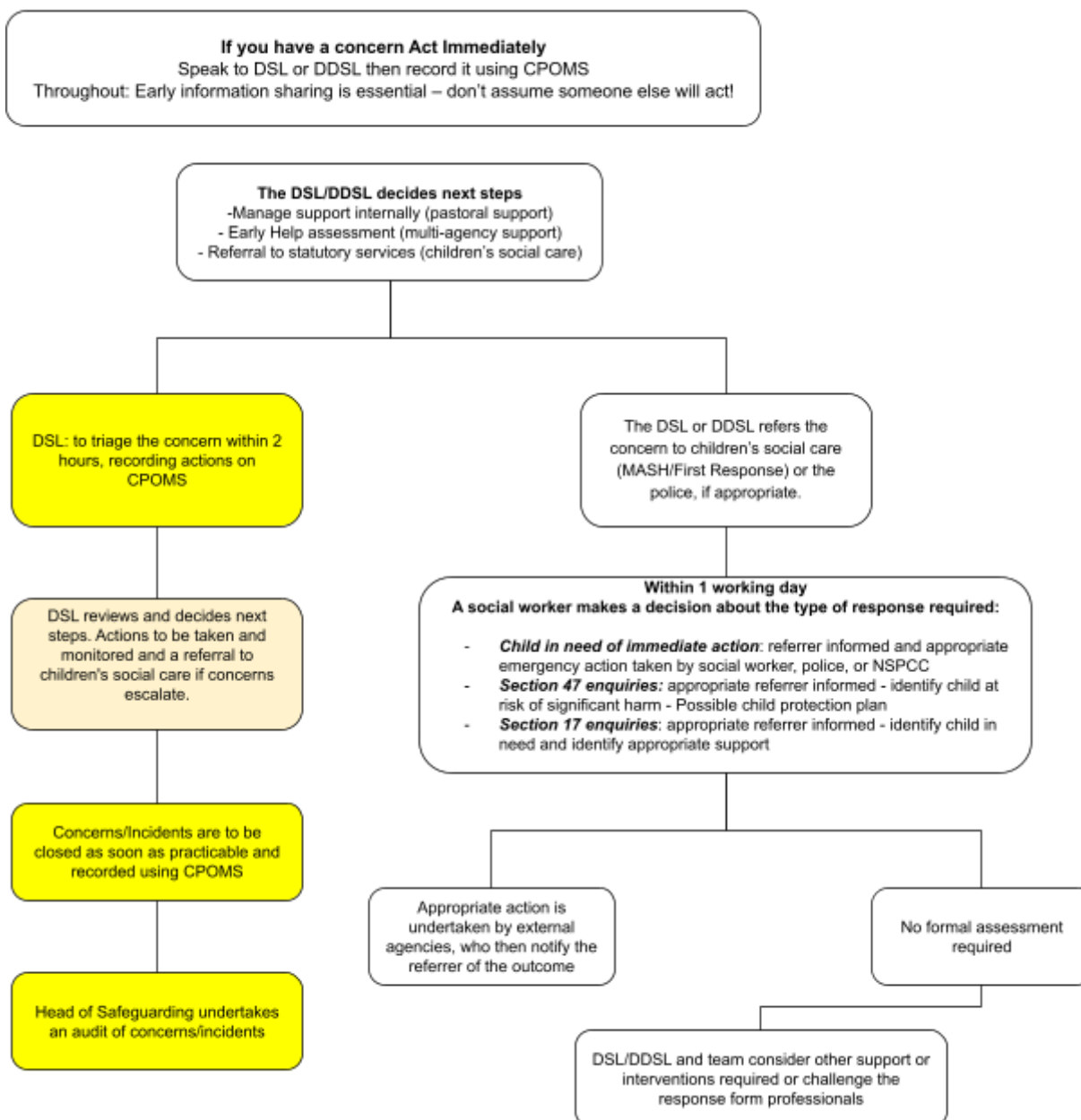
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- 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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 33 of 85	

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



9.4.6 Mental Health, Wellbeing

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 34 of 85

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 speaking to the DSL or DDSL following the steps in section 9.4.

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.

If the allegation is against a member of staff, the Designated Safeguarding Lead (DSL) or a Deputy DSL or, the allegation should be reported to the Principal immediately. The matter will be referred by the DSL to the Local Authority Designated Officer (LADO) within one working day. If the DSL is making the referral, they will keep the Executive Head informed. Any doubts or concerns may be discussed informally with the LADO, initially on a 'no names' basis.

If the allegation is against the Principal, the person receiving the allegation should immediately inform the chair of Governors

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".

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 35 of 85

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 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.

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

- You must record the allegation using CPOMS 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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 36 of 85	

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:

- 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 nudes and semi-nudes (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately and record this on CPOMS.

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 37 of 85

- Ask the child(ren) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- 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
- [Sharing Nudes and Semi-Nudes Guidance](#) updated Mar24

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)

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 38 of 85

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

- The incident involves an adult
- 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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 39 of 85

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 CPOMS. The record-keeping 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.

9.4.10 Children Absent from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 40 of 85

numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

Educ8 has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

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.

9.6 Specific Safeguarding Issues / Vulnerable Children

Some children and young people may face particular risks that require

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 41 of 85

additional vigilance and support. These include, but are not limited to:

- Children affected by domestic abuse or parental imprisonment
- Private fostering arrangements
- Children with special educational needs (SEN), disabilities, or physical/mental health issues
- Children at risk of radicalisation, child sexual exploitation (CSE), female genital mutilation (FGM), or other forms of exploitation

Children with Special Educational Needs, Disabilities, or Health Issues

Learners with SEN, disabilities, or significant health conditions can face additional safeguarding challenges. Barriers may include:

- Misattributing signs of abuse, neglect, or exploitation (e.g., behaviour, mood, injury) to the child's disability without further exploration
- Increased vulnerability to peer isolation and social exclusion
Greater risk of being disproportionately affected by bullying or harmful behaviour, sometimes without showing outward signs
- Communication difficulties that may prevent children from reporting concerns effectively
- Physical or mental health issues that create additional barriers to disclosure

The school identifies these challenges through the SEND register and provides enhanced pastoral support, ensuring that communication and safeguarding needs are appropriately addressed (see Sections 13–9 SEN & Disability Policy).

Children with Family Members in Prison

Children with a parent or close family member in prison may experience emotional distress, stigma, or neglect and are considered potentially vulnerable. Staff should remain alert to changes in behaviour or wellbeing and follow safeguarding procedures if concerns arise.

Private Fostering Arrangements

A private fostering arrangement occurs when a child under 16 (or under 18 if disabled) is cared for by someone who is not a parent or close relative for 28 days or more. Staff must inform the DSL if they become aware of such arrangements, as these must be reported to the local authority in accordance with safeguarding regulations.

9.7 Children and young people with a social worker

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 42 of 85

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:

- Responding to unauthorised absence or deliberately 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 personal bags 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

Content Harms

In line with updated statutory guidance (KCSIE 2025), our school's safeguarding policy has expanded its definition of content-related online harms. It now explicitly includes:

- **Misinformation** — content that is false or misleading, regardless of intent.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 43 of 85

- **Disinformation** — deliberately false or deceptive content intended to mislead (sometimes referred to as "fake news").
- **Conspiracy Theories** — speculative narratives unsupported by credible evidence, which may distort reality or promote extremist ideologies. [NSPCC LearningEdurioSmoothwall](#)

These additions affirm that, beyond traditional concerns like inappropriate images or extremist content, such misleading and manipulative content is formally recognized as a safeguarding risk.

Digital Safeguarding Measures

To address these content harms, our school will:

- Teach critical digital literacy—helping pupils identify bias, question credibility, and think critically about online information. [Computeam](#)
- Maintain robust filtering and monitoring systems, aligned with the DfE's **Plan technology for your school** self-assessment tool. [SmoothwallBlake Morgan](#)
- Follow DfE standards and expectations around monitoring **Generative AI tools** to ensure safe usage. [SmoothwallHCR Law](#)

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Learners are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

The technology used in Educ8 schools are monitored regularly by the Executive Board and the Proprietor. Annual updates are conducted on the laptops, tablets and devices by the school to ensure they are safe for use.

Filtering and monitoring

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 44 of 85

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.

- Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include:
 - Physical monitoring
 - Monitoring user logs
 - Monitoring individual devices
- We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures.
- Each year (at least) our designated safeguarding lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.
- All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns
- All our staff have taken part in annual cybersecurity training

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.

Information on online safety, the use of technology linked to Educ8's curriculum can be found in the prospectus and at www.educ8group.com,

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 45 of 85

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.

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.

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 46 of 85

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 CPOMS
- All staff may report on CPOMS and access their records. Access to all other aspects of the system are restricted to those holding a safeguarding role in the site (DSL/DDSL/Responsible Director/Head of Safeguarding)
- The CPOMS system has security assurances built in and access is secured by password with 2SV
- The DSL shares information with other agencies verbally or by encrypted email when this is appropriate.

9.11 Reporting Safeguarding Concerns and Incidents

All concerns should be logged on CPOMS as soon as possible. Full details of how to use the system can be found on the CPOMS Help Site, educ8 CPOMS Chat Group and within this policy.

All site staff must ensure they know how to log and act upon an Alert action that is assigned to them. The DSL and DDSL will manage all concerns, discussions and decisions made including the rationale for those decisions. These recordings should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

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

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 47 of 85

assign a case owner and identify categories of concern and record any actions taken.

Open cases should be reviewed and updated at least weekly

Open cases should be closed as soon as is practical

Cases will be periodically monitored by the Educ8 Governance Board

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 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.'

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 48 of 85

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.

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 49 of 85

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:

- Volume and Nature of Concerns
- Functional Area / Source of Concern
- Referrals and Escalations
- Vulnerable Groups (CP, CiN, LAC, SEND, Kinship Care)
- Attendance and Absent Education
- Online Safety (Filtering & Monitoring Alerts)
- Training and Policy Compliance
- Allegations Against Staff
- Student Voice & Wellbeing
- Trends and Patterns

11. Quality Records

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

Required Record	Custodian
-----------------	-----------

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 50 of 85

Training Records	Deputy Executive Head
Completed Flow Chart for Raising Safeguarding Concerns Template	DSL
Incidents/Concerns logged using CPOMS	DSL

12. Form(s)/Template(s)

There 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

APPENDIX 1 - CPOMS Safeguarding Recording, Monitoring, and Case Management

Purpose of CPOMS

CPOMS provides a secure and intuitive platform for managing all safeguarding and wellbeing concerns within the school. It enables early intervention, ensures statutory

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 51 of 85

and legal obligations are met, and allows safeguarding leads to monitor, review, and close cases effectively.

Responsibilities and Case Management

- **Recording:**
 - Safeguarding concerns should be recorded using the **CPOMS incident form**.
 - Records must be detailed, accurate, and completed promptly. Do not allow completing the form to delay **urgent notification** to the DSL, Head of Safeguarding, Manager, or Responsible Director.
- **Monitoring and Review:**
 - The **DSL at each school** (Head of School) is responsible for actioning, monitoring, and reviewing safeguarding concerns at site level. The **Head of Safeguarding** oversees group-wide monitoring, reviewing patterns, and ensuring compliance using CPOMS.
 - Cases should be actively reviewed until they are **closed**, with all actions clearly recorded.

Notification and Escalation:

- If you cannot contact the onsite DSL or Head of Safeguarding, speak to the **Director of Safeguarding** or another Board member (see Section 8.2 Key Contacts).
- For **immediate emergencies**, dial **999** and contact the police.
- Local LADO and Children's Safeguarding Board contacts are displayed on the site noticeboard.

Guidance for Completing a Safeguarding Incident Form:

- Ask **open-ended questions**, not leading questions.
- Listen carefully and maintain an **open mind**.
- Do not make judgments about whether abuse or neglect has occurred.
- Never promise confidentiality.
- Include all administrative details, including **child's date of birth**, for reporting purposes.
- Use your **full name** (not initials).
- Record details **preferably in the child's own words**.
- Only report what **you directly observed or were told**; others must submit their own records.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 52 of 85

- Complete **one record form per child**
- Ensure accuracy, as records may be used in **court cases or inquests.**
- Once completed, the DSL will be notified of the incident

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 53 of 85

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. Physical abuse can be unintentional harm through carelessness or severe discipline.

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 54 of 85

behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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 B 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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 55 of 85

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 56 of 85

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 57 of 85

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.

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 58 of 85

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 59 of 85

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 60 of 85

- 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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 61 of 85	

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

Policy Educ8	Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy	Page #: 62 of 85	

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

'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.

They may seem minor on their own but could be a pattern of behaviour over time. The idea is early intervention to protect pupils and support staff to correct behaviour:

- **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.**

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 63 of 85

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

- Using overly familiar or unprofessional language with pupils or being over friendly.
- Having “favourite” students in a way that could be seen as unfair.
- taking photographs of children on their personal mobile phone; Texting a pupil about non-school matters (but not in a sexual or harmful way).
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.
- Failing to maintain appropriate physical boundaries (e.g., unnecessary hugs).

Action:

- Should still be **reported to the safeguarding lead**.
- Logged in writing on CPOMS so patterns can be spotted.
- Will lead to informal guidance, training, or reminders about professional boundaries.

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 64 of 85

- 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.

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 65 of 85

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

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 66 of 85

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 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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 67 of 85

APPENDIX 6 - Specific safeguarding issues

Part 1 & Annex B 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 should read this annex.

Children absent from education

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 are absent from education, particularly on repeat occasions or for long periods, to help identify the risk of abuse, neglect and exploitation, including sexual exploitation, and to help prevent the risks of future absence. 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 absent/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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 68 of 85

Child criminal exploitation:

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

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.

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 is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity.

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 69 of 85

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.
- Potential vulnerabilities include:
- Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.
- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 70 of 85

being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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.

County Lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 71 of 85

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 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, bisexual, or gender questioning (LGBGQ)

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

Risks can be compounded where children who are LGBGQ 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.

LGBGQ 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 24)

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)

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 72 of 85

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

FGM

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 73 of 85

- 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:

- 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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 74 of 85	

- 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.

How to report

It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18). [Mandatory reporting of FGM](#)

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.

It is 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 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

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 75 of 85

- 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 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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 76 of 85

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

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](#).

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 77 of 85

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

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.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 78 of 85

APPENDIX 7 - Local Procedures: [Your Area]

Concern		Contact Details
FGM	If you are concerned that FGM has taken place: As a teacher, report to the Police immediately. All other staff report to DSL immediately. If you are concerned that FGM may have taken place or might be about to: All staff to report to DSL	Police: 101 or 999 DSL: [Name] [Mobile #]
Children's Social Care Referrals	Coventry Warwickshire	024 7678 8555 01926 414144
Child Sexual Exploitation	Coventry Warwickshire	024 7678 8555 01926 414144
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		https://www.coventry.gov.uk/childrens-social-care/coventrys-multi-agency-safeguarding-hub-mash
Harmful Online Challenges and online hoaxes		https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes
Operation Encompass		https://www.operationencompass.org/

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 79 of 85
Supports children who experience domestic abuse See appendix 9 Policy 2 Safeguarding and Child Protection.		mpass.org/ Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).]	

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy		Page #: 80 of 85	

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 local threshold document which includes the process for the local Early Help

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 81 of 85

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.

Policy Educ8	Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy	Page #: 82 of 85	

Appendix 9 Operation Encompass

As part of its commitment to safeguarding and promoting the welfare of all pupils, Educ8 participates in Operation Encompass—a national initiative that supports children and young people who are affected by domestic abuse.

Purpose

Operation Encompass is a police and education early intervention partnership. It ensures that schools are notified prior to the start of the next school day when police have attended a domestic abuse incident where a child is present, resides at the property, or is otherwise known to be affected.

This early notification enables the school to take swift and appropriate action to safeguard and support the child in line with their individual needs.

Information Sharing

- The police share relevant and proportionate information directly with the school's Designated Safeguarding Lead (DSL).
- This information is shared in confidence and in line with data protection, safeguarding, and child protection protocols.
- Only key members of staff, on a strict need-to-know basis, will be informed to ensure the child receives appropriate support.

School Response

Upon receipt of an Operation Encompass notification, Educ8 will take appropriate action, which may include:

- Monitoring the child's emotional wellbeing and behaviour more closely.
- Providing pastoral or therapeutic support, including access to internal or external counselling services.
- Making reasonable classroom or timetable adjustments to reduce distress or anxiety.
- Ensuring sensitive communication with parents or carers, where it is safe and appropriate to do so.
- Recording the concern securely and in accordance with the school's safeguarding procedures.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 83 of 85

- Working collaboratively with external safeguarding partners where necessary.

Rationale

Exposure to domestic abuse is recognised as a form of emotional abuse and can have a significant impact on a child's mental health, wellbeing, and development. By participating in Operation Encompass, Educ8 ensures that children affected by domestic abuse are identified early and offered appropriate support and intervention in a safe and trusted environment.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 84 of 85

Appendix 10 Summary of Educ8 Safeguarding & Child Protection Policy

1. Purpose & Principles

- Safeguarding and child protection is **everyone's responsibility**.
- All children have the right to be safe from harm, neglect, exploitation, and abuse, both inside and outside the home, including online.
- The policy adopts a **child-centred approach**, in line with *KCSIE 2025* and *Working Together to Safeguard Children 2023*.
- Commitment to fostering a **culture of safeguarding** across all Educ8 schools.

2. Scope

- Applies to **all staff, volunteers, contractors, visiting/part-time staff, and governors**.
- Covers activity **on-site and off-site**, including trips and extended provision.
- Governors are responsible for ensuring mechanisms are in place to support staff in fulfilling their safeguarding duties.
- Procedures align with **Local Safeguarding Children Partnerships (LSCPs)** and statutory safeguarding partners (LA, ICB, Police).

3. Roles & Responsibilities

- **All staff**: trained in safeguarding, vigilant to signs of abuse, must report concerns via **CPOMS** and/or DSL.
- **DSL (Head of School)**: lead responsibility for safeguarding, referrals, case management, staff training, and parent liaison.
- **Head of Safeguarding**: monitors safeguarding activity across the group, oversees DSL practice, acts as case manager where necessary.
- **Director of Safeguarding**: strategic oversight, policy approval, compliance monitoring, reports to Executive Board.
- **Executive Board/Governors**: ensure training, challenge and assure safeguarding practice, and receive safeguarding performance reports.

4. Key Procedures

- **Recognising and reporting abuse** – staff must log concerns immediately on **CPOMS** and escalate to DSL. Anyone can make a direct referral to social care or police.
- **Disclosures by children** – listen, record, reassure, and report; do not promise confidentiality.
- **FGM** – mandatory duty for teachers to report known cases directly to police.
- **Child-on-child abuse** – explicitly recognised; includes bullying, sexual harassment, sexting, and online abuse.
- **Children missing from education** – tracked closely; referrals made to LA when necessary.
- **Mental health** – recognised as a safeguarding factor; staff to escalate concerns to DSL.

Policy Educ8		Document #: 2	Issue: 4.6
Title: Safeguarding & Child Protection Policy			Page #: 85 of 85

- **Online safety** – filtering/monitoring systems in place; new risks from misinformation, disinformation, and conspiracy theories recognised.

5. Training & Culture

- **All staff:** safeguarding and child protection training at induction, refreshed regularly, including online safety and Prevent.
- **DSLs:** Level 3 training at least every 2 years plus annual updates.
- **Executive Board/Governors:** safeguarding training at induction and updated regularly.
- **Interview panels:** at least one member with safer recruitment training.
- Emphasis on **professional curiosity**, vigilance, and empowering children to report concerns safely.

6. Record-Keeping & Monitoring

- Safeguarding records logged and managed on **CPOMS**.
- Cases triaged within 2 hours where possible; open cases reviewed weekly.
- Group-level monitoring by the **Head of Safeguarding** and **Executive Board**.
- Records securely maintained, transferred, and retained in line with statutory requirements.

7. Review & Governance

- Policy approved by **Executive Board** and reviewed annually by the **Group Incident and Safeguarding Governance Committee**.
- Site-specific procedures reviewed annually by **Site Leads**.
- Compliance monitored through metrics (e.g. concerns logged, referrals, vulnerable groups, attendance, online safety alerts, training compliance).