



## **APEX EDUCATION SAFEGUARDING & CHILD PROTECTION POLICY**

Policy approved by: **Directors**

Date reviewed: **August 2024 (Updated September 2025)**

Next review date: **July 2027**

### **Contents**

1. Introduction
2. Aims
3. Statutory Framework
4. Management Committee
5. Procedures
6. The Role of the Designated Safeguarding Lead (DSL)
7. Confidentiality
8. Equality Statement
9. Pupils with Special Educational Needs (EHCPs) and Disabilities
10. Child Protection and Safeguarding for Learners on Off-Site Activities
11. Periods of Lockdown and School Closure
12. Mental Health
13. Gender Identity and Trans Students
14. Domestic Abuse
15. Risk of Harm Linked to Culture, Faith and Belief
16. Child Sexual Exploitation
17. Child Criminal Exploitation and County Lines
18. Child-on-Child Abuse
19. Risk of Becoming Involved in Serious/Violent Crime
20. Radicalisation and Extremism
21. E-Safety/Online Safety
22. Attendance and Punctuality
23. Children Missing in Education

24. Private Fostering and Care Leavers
25. Dealing with a Disclosure
26. Record Keeping
27. Communication With Parents
28. Curriculum
29. Staff Recruitment and Volunteers
30. Allegations Involving School Staff/Volunteers
31. Whistleblowing
32. Transport

## **1.Introduction**

The Department for Education defines safeguarding and promoting the welfare of children in Keeping Children Safe in Education 2025 as: Protecting children from maltreatment; Preventing impairment of children’s mental and physical health or development; Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and Taking action to enable all children to have the best outcomes. This policy is based on and should be read in conjunction with other Apex Education Policies, Local Authority Safeguarding Policies and Government Publications including, Keeping Children Safe in Education(September 2025), Working Together to Safeguard Children(July 2018), What to do if you are worried a child is being abused(March 2015), Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings(February 2022), The Prevent Duty(June 2015), Allegations Against Staff and Volunteers Who Work With Children(2022), Suffolk Safeguarding Partnership Policies & Protocols, Apex Education Behaviour & Anti-Bullying Policy, Apex Education Online Safety Policy, Apex Education Health & Safety Policy, Apex Education Data Protection Policy, Apex Education Safer Recruitment Policy, Apex Education Complaints Procedure, Apex Education Admissions Policy, Apex Education Fire Safety Policy, Apex Education First Aid Policy and Apex Education Managing Allegations Policy.

All of these documents must be read, and staff must sign to agree that they have read the document

## **2.Aims**

At Apex Education we are committed to safeguarding children and young people and we take all aspects of safeguarding and child protection seriously. We hold a firm belief that both mental and physical health are equally important in safeguarding children. We believe that safeguarding and promoting the welfare of children is everyone’s responsibility. We expect everyone who works in our school to share this commitment. In order for us to fulfil this responsibility effectively, Apex

Education focuses on a child-centered approach. Adults in our school take 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. In order for staff to effectively fulfil their duty to safeguard children it is important for them to keep up-to-date with sector developments. Therefore, staff members are required to receive specific child protection and safeguarding updates wherever necessary, in order to help them identify concerns and protect the pupils under their care. We will also take into consideration and risk assess the wider environmental factors in a child's life that may be a threat to their safety and/or welfare, this is known as contextual safeguarding. We strive to:

1. To ensure that everyone in the organisation shares an objective to help keep children and young people safe.
2. To develop an awareness in teaching and associate staff of the need for Child Protection and their responsibilities in identifying and reporting cases of abuse.
3. To provide a format for systematic monitoring of children thought to be at risk.
4. To highlight the need for continuous communication in our setting.
5. To develop a structured internal procedure to be followed by all members of staff in cases of abuse.
6. To involve outside agencies as appropriate.
7. To support the child's development in ways which will foster security, confidence and independence.
8. To integrate a child protection curriculum within the existing curriculum.
9. To ensure that all staff are aware of the location of confidential files and the school's copy of the LA Child Protection procedures.
10. To ensure that all staff undertake regular Child Protection training.
11. To provide a model for open and effective communication between children, teachers, parents and other adults working with children.
12. To provide opportunities for students at Apex Education to express their thoughts and feelings.
13. To ensure that our records are kept up-to-date.
14. To make sure that parents are aware of what will happen if Child Protection concerns arise.

### **3.Statutory Framework**

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

- The Children Act 1989 and The Children Act 2004
- Education Act 2002 (Section 175)
- Suffolk Safeguarding Partnership Inter-agency Child Protection and Safeguarding Children Procedures
- Safeguarding Children and Safer Recruitment in Education (DfE, April 2011)
- Working together to Safeguard Children (HM Government, 2018)

- The Education (Pupil Information) (England) Regulations 2005
- Dealing with Allegations of Abuse Against Teachers and Other Staff (DfE, 2011)
- Keeping Children Safe in Education (DfE, September 2025)
- Suffolk Thresholds Guidance Assessment Protocol (2021-2024)
- Working together to Safeguard Children (HM Government 2018) requires all schools to follow the procedures for protecting children from abuse, which are established by Suffolk Safeguarding Partnership

#### **4. Management Committee**

The Management Committee has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment. It is recommended that a nominated governor for child protection is appointed to take lead responsibility.

The nominated Management Committee member for child protection is: Scott Peat (Designated Safeguarding Lead)

In particular, the Management Committee must ensure:

- Child protection policy and procedures
- Safer recruitment procedures
- Appointment of at least 1 designated senior teacher who is a senior member of the provisions leadership team
- Relevant safeguarding children training for school staff/volunteers is attended Safe management of allegations
- Deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- A Managing allegations policy will be in place for allegations of abuse being made against the service lead
- Safeguarding policies and procedures are reviewed annually and information provided to the local authority about them and about how the above duties have been discharged.

#### **5.Procedures**

To ensure effective practice staff will:

1. Be offered induction training, this is mandatory and will include;
2. The child protection policy;
3. The relationship policy;
4. The staff code of conduct; and
5. The role of the designated safeguarding lead and any deputies
6. All staff to be familiar with the provisions child protection policy and procedures.

7. Contribute to the prevention of child abuse through teaching. This builds awareness of the dangers of abuse, helps children to protect themselves and develops more responsible attitudes to adult life and parenthood.
8. All staff to be aware of the signs of abuse and know to whom they should report concerns too.
9. In the event of a member of staff (whether teaching or associate) having a child protection concern about a student(s), he/she will immediately inform the designated safeguarding lead and record accurately the events giving rise to the concern.
10. All staff will take part in training courses which lead to a greater understanding of child abuse and their responsibilities with regard to safeguarding and child protection.
11. All staff will undergo regular safeguarding and child protection training on whole service INSETs
12. All staff will undertake full training and ongoing refresher training to ensure all safeguarding issues are logged, triaged and filed accordingly.
13. Designated safeguarding leads will undergo safeguarding child protection training every 2 years and receive regular safeguarding and child protection updates as required, and at least annually.
14. Monitor the progress of children identified as being at risk and those with a Child in Need or Child Protection Plan.
15. Contribute to the multi-agency approach to child protection by developing effective and supportive liaison with other agencies.
16. Provide information to other agencies e.g. submitting reports to social care in preparation for meetings and case conferences.
17. Have an ethos in which children feel safe and secure, where their views are valued and where they are encouraged to talk and be listened to.
18. Be aware of the Local Safeguarding Children Partnership Procedures including the procedures for a member of staff suspected of abuse. All suspected cases of child abuse should be promptly referred to the local social care department or to the police child protection team who are the investigative agencies in case of child protection.
19. To be familiar with the following policies listed in the introduction to this document.
20. Be aware of safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
21. Fully understand expectations, specific roles and responsibilities in relation to online safety, filtering and monitoring.

## **6.The Role of the Designated Safeguarding Lead (DSL)**

The designated safeguarding lead at Apex Education is Scott Peat.

The key role of the designated safeguarding lead is:

- The designated safeguarding lead and any deputies must undergo training every 2 years. In addition to formal training, their knowledge and skills should be updated at regular intervals, and at least annually.
- To understand the online filtering and monitoring systems and processes in place.
- To make sure that all Apex Education staff are aware of and adopt the Suffolk and Apex Education policies, guidance and procedures.
- To ensure that all staff are aware of Suffolk Safeguarding Children Partnership procedures and where to locate them.
- Be aware of pupils who have a social worker.
- To have overall responsibility for safeguarding and child protection issues at Apex Education and keep staff appropriately informed, only share information on a 'needs to know' basis, bearing in mind the importance of confidentiality.
- To liaise with social care and other external agencies on matters of safeguarding and child protection.
- To make decisions in relation to the appropriate level of response for specific concerns about a child e.g. discuss with parents, referral to the early help hub or refer to social care (using the MARF form)
- To follow up concerns with social care and seek feedback if there has been no acknowledgement of a MARF referral within 3 working days.
- To work with parents to build an understanding of our responsibility to ensure the welfare of all children and young people and the recognition that this may occasionally require cases to be referred to other investigative agencies as a constructive and helpful measure.
- To monitor and ensure that accurate records of case notes and other sensitive material are being logged correctly.
- To facilitate and support the development of company policy on safeguarding and child protection.
- Ensure that new staff receive a safeguarding children induction within 7 working days of commencement of their contract.
- Ensure that the child protection information is transferred to the pupil's school.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with all staff.
- To ensure that staff consider how the curriculum might empower children and young people and prevent abuse.

- To offer support to staff who have concerns about a child or have handled a disclosure, attended a case conference or given evidence in court.
- To have regard to the Positive Handling and to ensure that staff know that excessive use of force could lead to allegations of abuse.
- To ensure that all staff are aware of:
  - o Keeping Children Safe in Education - September 2025
  - o Working Together to Safeguard Children - July 2018
  - o Guidance for Safer Working Practice for Adults who work with Children and Young People in Education - May 2019

If the designated safeguarding lead is not available to discuss concerns, then staff should take advice from social care.

## **7. Confidentiality**

Timely information sharing is essential to effective safeguarding and fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. At Apex Education staff are aware that they should never promise a child that they will not tell anyone about a disclosure of abuse, as this may not be in the child's best interests. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead or deputy designated safeguarding lead. For further detailed information, please read HM Governments 'Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and carers' which includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1062969/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf)

Confidentiality is also addressed in this policy with respect to record-keeping, and allegations involving staff.

## **8. Equality Statement**

Some children are at 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 are able to recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. At Apex Education we identify pupils who might need more support to be kept safe or to keep themselves safe. We give special consideration to children who:

- have Special Educational Needs (SEN) or disabilities,
- are young carers, may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality,
- have English as a second 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

Children and young people with special educational needs and disabilities can face additional challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers

At Apex Education we also recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are vulnerable to further harm, as well as facing education barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

## **9.Pupils with Special Educational Needs (EHCPs) and Disabilities**

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in overcoming these barriers

Therefore, there is a duty to make reasonable adjustments for disabled children and young people. We offer extra pastoral support for pupils with SEN and disabilities.

This includes:

- 1:1 support sessions
- Mentoring

## **10. Child Protection and Safeguarding for Learners on Off-Site Activities**

In order to keep children and young people safe when on off-site activities, Apex Education does the following annually:

- Quality assures child protection and safeguarding procedures and policy at the provider
- Views the provider's SCR up to three times per year to check that all staff and volunteers are appropriately vetted
- Conducts up to 3 x annual site visits to look at the environment
- Speaks to a small group of learners about their perception of their safety and wellbeing whilst at the venues.

Should a safeguarding or child protection concern come to the attention of the provider, the provider will follow their own policy and procedures, making any referral to social care. Information about the concern would then be communicated to Apex Education from social care and / or the commissioned provider through regulated routes so that Apex Education is kept in the loop and can re-assure itself as the ultimate authority and roll for the student(s) that they are safe and that any concerns are being addressed and followed-up. Apex Education will challenge a provider on their response to a safeguarding / child protection concern should the feeling be that an issue has not been addressed to an acceptable standard. Apex Education will always have members of staff to supervise the students regardless of whether we are delivering the sessions.

Students that are offsite will be tracked by a vehicle tracker. This will ensure schools know where their students are at all times and senior staff can also track movements.

## **11. Periods of Lockdown and School Closure**

Apex Education remains committed to safeguarding and protecting all children in periods of any mandatory lockdown or required school closure. It is likely that Apex Education will be open to all vulnerable and key worker children, and will continue

to provide education and support to all students and their families. The government definition of vulnerable children is:

“Those that have been assessed as being in need under section 17 of the Children Act 1989, including children who have a child in need plan, a child protection plan or who are a looked-after child. Have an education, health and care (EHC) plan and it is determined, following risk assessment, that their needs can be as safely or more safely met in the educational environment. Have been assessed as otherwise vulnerable by educational providers or local authorities (including children’s social care services), and who could therefore benefit from continued attendance. This might include children and young people on the edge of receiving support from children’s social care services, adopted children, those at risk of becoming NEET (‘not in employment, education or training’), those living in temporary accommodation, those who are young carers and others at the provider and local authority’s discretion.”

The safety and wellbeing of our students is our utmost priority, we will ensure that daily welfare calls are made to all vulnerable students whose parents or guardians have elected for them not to attend the provision.

We will put any extra measures needed in place to ensure the safety of all staff and students.

Our safeguarding principles remain the same and are listed below:

- The best interests of children must always come first
- Any safeguarding concerns about a child should be acted on immediately
- Children should continue to be protected when they are online

Staff continue to record new safeguarding concerns through our safeguarding and reporting system, for students who are attending and those that are at home.

Safeguarding issues that have been identified from daily/weekly welfare calls are actioned promptly by the designated safeguarding leads and referred to the relevant agencies. When students begin any phased re-entry, staff are to be vigilant of how periods of lockdown are impacting them and their families and the safeguarding issues this may raise. Designated safeguarding leads will continue to action safeguarding concerns for students not attending and prioritise those returning, with referrals to the relevant local services and agencies.

## **12.Mental Health**

Apex Education strives to promote student mental health and wellbeing. All staff at Apex Education 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. Apex Education has clear systems and processes in place for identifying possible mental health conditions and will make the appropriate referrals to CAMHS and social care if needed.

### **13. Gender Identity and Trans Students**

Gender Identity is the gender that a person “identifies” with or feels themselves to be. While biological sex and gender identity are the same for most people, this is not the case for everyone. For example, some people may identify as a boy or girl, while others may find neither of these terms feel right for them and identify as neither, or are comfortable being fluid between both. Gender identity should not be confused with biological sex/assigned gender at birth, or with sexuality or who someone is attracted to. Being transgender means different things to different people. Like a lot of other aspects of who people are, like race or religion, there's no one way to be transgender, and no one way for transgender people to look or feel about themselves. The best way to understand what being transgender is like is to talk with transgender people and listen to their stories.

It is important to recognise that being transgender is not in itself a safeguarding concern. However most children and young people who are struggling with their gender identity may require the support of services. The 2017 report from Stonewall highlights that young transgender people are more likely to suffer poorer mental health than their peers, and experience difficulties in home and school life. Many transgender young people will also experience gender dysphoria. The NSPCC state that transgender young people are also at higher risk of grooming and child sexual exploitation. Therefore, as with all students, it is important to respond to any safeguarding concerns in the same way that you would for any other young person.

Good practice to support and help safeguard transgender young people should be embedded across policies and curriculum to help schools meet the Public Sector Duty of the Equality Act and eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations. All staff have a duty to safeguard children in accordance with their Statutory Duties. There are no issues under child protection or safeguarding law or practice specific to transgender children and young people aside from what is in place to keep all pupils safe. In the Department for Education statutory safeguarding guidance, Keeping Children Safe in Education (2025), is clear that governing bodies and proprietors should consider how children may be taught about safeguarding. This may include covering relevant issues through personal, social, health and economic (PSHE) education. Given the prevalence of bullying of transgender and gender questioning pupils, learning about gender identity should be considered under this obligation.

Ofsted inspectors will pay particular attention to outcomes for a range of groups of learners including 'transgender children and learners'. It also states: Inspectors will assess the extent to which the school or provider complies with relevant legal duties as set out in the Equality Act 2010 and the Human Rights Act 1998 promotes equality of opportunity and takes positive steps to prevent any form of discrimination, either direct or indirect, against those with protected characteristics in all aspects of their work. Additionally, guidance on Inspecting safeguarding in early years, education and skills settings makes clear that safeguarding action may be needed to protect children and learners from abuse, including transphobic abuse.

Developing a positive sense of gender identity is an important part of growing up for all children and young people. Apex Education is committed to developing pupil and student understanding of the spectrum of gender identity and provide support to trans, gender questioning and non-binary pupils, students and staff. Support for trans children and young people is embedded across all of our policies and our curriculum and we also ensure that children who are a part of the LGBTQ+ community have a trusted adult that they can be open with.

#### **14.Domestic Abuse**

The definition of domestic abuse is any single incident or pattern of incidents of controlling, coercive, threatening behaviours, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- physical
- sexual
- financial
- emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All children that witness and/or experience domestic abuse may be adversely affected by it, in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children specifically on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave their family home as a result.

At Apex Education staff are vigilant and trained to notice signs of domestic abuse and will work with and closely monitor children who are known to be experiencing domestic abuse/violence in the home.

### **15.Risk of Harm Linked to Culture, Faith and Belief**

So-called 'honour'-based abuse (HBA) encompasses all crimes, which have been committed to protect or defend the honor of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact their designated safeguarding lead as a matter of urgency.

Female Genital Mutilation (FGM) FGM refers to procedures that intentionally alter or cause injury to the female genital organs for nonmedical reasons, it involves cutting and sometimes sewing the girl's genitalia, normally without anesthetic. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation.

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

The Female Genital Mutilation Act 2003 makes it a criminal offence not only to carry out FGM in England, Scotland and Wales on a girl who is a 'UK national or permanent resident' but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is still legal.

The procedure has a cultural rather than religious origin and is practiced by separate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHCE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin

- Talk about a 'special' procedure to become a woman

### **Symptoms of FGM include:**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wishing to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside of the UK.

Indications that FGM may have already taken place include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear
- Talking about pain or discomfort between her legs
- Avoiding certain classes such as PE

School staff have a mandatory duty to report disclosures of FGM about a female under the age of 18 to the police. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify the police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made). Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

### **Forced Marriage**

In forced marriage either one or both parties do not consent to the marriage but are coerced into it by the use of physical, psychological, financial, sexual and emotional pressure. Schools can be seen as being in the front line in protecting young people from this type of abuse. Assisting and preventing forced marriage falls within schools' duty to safeguard pupils and promote their welfare. Schools

should ensure that they are able to respond promptly and effectively to disclosures or concerns about forced marriage. There are some characteristics that may indicate forced marriage:

- An extended absence from school/college, including truancy;
- A drop in performance or sudden signs of low motivation;
- Excessive parental restriction and control of movements;
- A history of siblings leaving education to marry early;
- Poor performance, parental control of income and students being allowed only limited career choices;
- Evidence of self-harm, treatment for depression, attempted suicide, Social isolation, eating disorders or substance abuse; and/or
- Evidence of family disputes/conflict, domestic violence/abuse or
- Running away from home.

While individual cases of forced marriage, and attempted forced marriage are often very particular, they are likely to share a number of common and important characteristics. On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur that they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping.

It is important to note that forced marriage and arranged marriage are not the same thing, arranged marriage is usually a part of some cultures and both young people can make the decision to accept or decline the partner chosen for them by their parents.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

For further detailed information, please read HM Governments 'The Right to Choose: Multi-Agency Statutory Guidance for Dealing with Forced Marriage and Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage'  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1153014/English\\_version\\_contents\\_page\\_updated\\_14.04.23.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1153014/English_version_contents_page_updated_14.04.23.pdf)

Further advice and information is available from the Forced Marriage Unit: Contact: 02070080151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

## **16. Child Sexual Exploitation**

Child Sexual Exploitation (CSE) 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:

- 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/suspicions 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.

At Apex Education we understand that child sexual exploitation can take many forms ranging from seemingly consensual relationships to serious gang and group exploitation and that students may not exhibit external signs of abuse, therefore staff must be vigilant in looking out for the less obvious signs. Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such. Staff are offered regular training in order to aid and support them in recognising the above.

A significant number of children who are victims of child sexual exploitation are likely to go missing from home, care and education at some point. Return interviews for young runaways can help in establishing why a young person ran away and the subsequent support that may be required, as well as preventing repeat incidents. The information gathered from return interviews can be used to inform the identification, referral and assessment of any child sexual exploitation cases.

In assessing whether a child or young person is a victim of sexual exploitation, or at risk of becoming a victim, careful consideration should be given to the issue of consent. It is important to bear in mind that:

- A child under the age of 13 is not legally capable of consenting to any type of sexual touching or sex (it is statutory rape);
- Sexual activity with a child under the age of 16 is also an offence;
- It is an offence for a person to have a sexual relationship with a 16 or 17-year-old if they hold a position of trust or authority in relation to them;
- Where sexual activity with a 16 or 17-year-old does not result in an offence being committed, it may still result in harm, or the likelihood of harm being suffered;
- Nonconsensual sex is rape whatever the age of the victim; and
- If the victim is incapacitated through drugs or alcohol, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed.

Child sexual exploitation is therefore a child protection issue for all children under the age of 18 years and not just those in a specific age group and where child sexual exploitation, or the risk of it, is suspected teachers should discuss the case with the designated member of staff for safeguarding and child protection. If after a discussion the concerns remain then safeguarding procedures should be triggered, and a MARF referral should be made to social care and the police notified.

## **17. Child Criminal Exploitation and County Lines**

Child Criminal Exploitation (CCE) is 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

Indicators of child criminal exploitation may include:

- 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.

It is important to highlight that child criminal exploitation is a form of abuse and like other forms of abuse it is strongly linked to an imbalance of power and whilst age may be the most obvious factor, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and economic background etc. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims could be being exploited even when the activity appears consensual and it should be noted that as well as being physical, exploitation can be facilitated and/or take place online.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (known as county lines) forced to shoplift or pickpocket, or to threaten other young people.

### **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.

NSPCC definition of a county line: The 2018 Home Office Serious Crime Strategy states the NPCC definition of a County Line is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

### **18.Child-on-Child Abuse**

At Apex Education staff are aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical
- harm;

- Sexual violence and sexual harassment;
- Gender-based violence;
- Sexting (also known as youth produced sexual imagery); Upskirting and
- Initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed of as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse and Apex Education recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boy’s perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously. Apex Education has put in place safeguards to reduce the likelihood of child-on-child abuse. 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 aggressive touching or grabbing towards female pupils, and initiation or
- hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by making pupils aware of that all staff are
- available for them to speak to if they need to and identifying key staff for particularly vulnerable
- pupils.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is
- being abused themselves, and that this would fall under the scope of this policy.
- 

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur 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.

Upskirting is a form of image-based sexual abuse that involves taking a photograph or recording an image from beneath a person's clothing without their consent or reasonable belief in their consent. The purpose of upskirting is to obtain sexual gratification or to cause humiliation, distress, or alarm to the victim. At Apex Education this will be treated in the same way as sexual abuse.

At Apex Education we believe that all children have a right to attend our provision and learn in a safe environment. Children should be free from all harm by adults in

the provision and other students. We do however, recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the our behaviour policy.

Occasionally, allegations may be made against students by others in the setting, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that, to be considered a safeguarding allegation against a pupil some of the following features will be found:

- Is made against an older pupil and refers to their behaviour towards a younger pupils or more
- vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the setting
- Indicates that other pupils may have ben affected by this student
- Indicates that young people outside of the setting may be affected by this student

Any child-on-child allegation must be referred to the designated safeguarding lead immediately; where a concern regarding child-on-child abuse has been disclosed to the designated safeguarding lead, advice 20 and guidance will be sought from social care and where it is clear a crime has been committed or there is a risk of crime being committed the police will be contacted.

Working with external agencies there will usually be a response to the unacceptable behaviour, for example, if a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected, the victim and perpetrator will be provided with appropriate support to prevent any reoccurrence of improper behaviour.

It is extremely important that all allegations of child-on-child abuse are accurately recorded with as much detail as possible so that there are no mistakes in information sharing and so that the appropriate action can be taken.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B.

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or settings approach to safeguarding.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support

In July 2022, peer-on-peer abuse was renamed child-on-child abuse.

## **19.Risk of Becoming Involved in Serious/Violent Crime**

All staff need to be aware of indicators of being involved in serious crime. Apex Education recognises that due to the nature of many of the children and young people who attend the service, there is a greater risk of becoming a perpetrator, witness or victim of serious crime. Staff should report any concerns using the usual referral procedures in place. Designated safeguarding leads should refer onto Early Help / Social Care any serious concerns or ongoing indicators.

The indicators are increased absence from school; relationships with older individuals / groups; decline in performance, self-harm; change in wellbeing; signs of assault / unexplained injuries; unexplained gifts / new possessions

There are two key documents:

'Preventing Youth Violence and Gang Involvement':

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

'Criminal Exploitation of Children and Vulnerable Adults – County Lines Guidance':

## **20.Radicalisation and Extremism**

As part of the Counter terrorism and Security Act of 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Apex Education understands the safeguarding risk that radicalisation and extremism poses to our students.

Radicalisation, Extremism and Terrorism definitions are outlined below:

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

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

Early indicators of extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very
- powerful narratives, programmes and networks that young people can come across online so
- involvement with particular groups may not be apparent.)

- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

We use the curriculum to ensure that children and young people understand how people with extremist views share these with others, especially using the internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the schools core values alongside the fundamental British values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with their designated safeguarding lead. The designated safeguarding lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead making a prevent referral.

Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from Apex education may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

For further detailed information, please read HM Governments 'Managing Risk of Radicalisation in Your Education Setting'  
<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting>

## **21.E-Safety/Online Safety**

Online Safety is an integral part of safeguarding. Mobile phones, laptops, iPads, and other products that allow internet access are integrated into all of our lives and many of these items are used within our schools. However, there are those that seek to use these for their own or others gratification. Online safety and covers issues such as:

Identity theft

- Invasion of privacy
- Children and young people seeing/accessing offensive images and messages
- Bullying, including cyberbullying and prejudice-based bullying,
- Racialisation and/or extremism.
- Online grooming
- Child Sexual Abuse and/or Exploitation
- Child Criminal Exploitation
- Modern slavery and/or trafficking
- Misinformation, disinformation ('fake news') and conspiracy theories
- Cybersecurity including use of AI

It also covers other issues such as consensual image sharing; this can be slightly more difficult to deal with especially when it occurs between older children of the same age and it usually requires a different response as it might not be abusive. However, children still need to know it is illegal and we can provide the with this knowledge through education. The UK Council for Child Internet Safety (UKCCIS) provides detailed advice about sharing of nudes and semi-nude images and videos.

For further detailed information, please read UKCCIS 'Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People'

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1008443/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_Web\\_accessible\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible_.pdf)

The range of issues classified within online safety is considerable, but the risks can be categorised into three areas:

- Content: being exposed to illegal, inappropriate or harmful content; for example: pornography, fake news, racist, misogynistic, self-harm, suicide, anti-semitic, radical and extremist;
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults for the purposes of grooming children; and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, sharing others explicit images and online bullying.

As schools, colleges and alternative settings increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place (KSCIE, 2023). At Apex Education when children use our network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. The Senior Leadership Team (SLT) and the IT department work closely together to monitor websites, URLs and key search words used by students; regular reports are then produced so that DSLs can carefully put together interventions for students who attempt to access inappropriate content. The DSL and all other staff have ability to block/unblock websites and change the level of online access for any student or staff member. However, many pupils are able to access the internet using their own data plan.

## **22.Attendance and Punctuality**

Apex Education staff feel that attendance and punctuality are extremely important and if a child has low attendance or is often late, we would consider this a safeguarding concern. We expect the highest of attendance and good punctuality and we believe that children who fall below 90% attendance or those that have regular lateness could be experiencing (this list is not exhaustive.):

- Anxiety
- Bullying
- Mental Health
- Poor routine
- Familial problems
- Being groomed
- Being criminally or sexually exploited

We have interventions to keep children safe and support them into school full time. We understand that sometimes, due to complex needs, some of our children will have lower-than-average school attendance. Nonetheless, until we have information from an agency or medical practitioner to confirm a specific diagnosis or need that determines why a student would have lower-than-average attendance or punctuality to school. Our staff will approach falling / low attendance (below 90%) and punctuality with curiosity and support, challenge and intervention will be put in place to secure improvements.

The procedure for first day absence will be to notify the school and contact parents/carers within 30 minutes of the start of the school day. Where students are collected a call will go to parents at this point if they have not made it on time to their pick up point. Any further absences will be dealt with in the same way. If we have a pattern of absences we will work with the student, family and school to look at the barriers. We will use interventions such as home visits, parental meetings and phonecalls to address the issue.

### **23.Children Missing in Education**

Children Missing from Education (CME) refers to all children of compulsory school age who are not on a school roll, in alternative education provision or in Elective Home Education. Knowing where children are in 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 other safeguarding issues, including the criminal exploitation of children.

At Apex Education we monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with schools and parent/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parent/carers. Parents should remember to update school as soon as possible if their numbers change.

In response to Keeping Children Safe in Education (2025) Apex Education has:

1. Staff who understand what to do when children do not attend regularly and are able to identify CME.
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: leave school to be home educated move away from the school's location remain medically unfit beyond compulsory school age are in custody for four months or more (and will not return to school afterwards); or e. are permanently excluded
5. Students are flagged to the LA as CME when they have had 10 or more days off school through collaborative work with the on-roll school.

Any students that we consider to be CME will be highlighted to their main school and support will be given to them.

## **24. Private Fostering and Care Leavers**

A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangements is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social worker to inform the school. However, it should be clear to the school who has parental responsibility.

At Apex Education school staff are aware that they should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the registered school of the child involved to check that they are aware of their duty to inform the local authority.

## **25. Dealing with a Disclosure**

Children experiencing distress or abuse will often make a disclosure in school, this is because school is the place where they feel safest, most secure and listened to. It is extremely important to ensure that all staff know how to deal with a disclosure as sometimes students may disclose abuse/neglect to a lunchtime supervisor, caretaker etc. as these are often the friendly faces they will see whilst moving through the corridors and they feel less intimidated by them. If a child discloses any abuse/neglect to any member of staff it is important to remember that it is school's role to recognise and refer, not to investigate.

It is important to recognise that disclosure may not always be made verbally to a staff member; sometimes children choose to disclose their experiences through drawing, writing and play. A child may even choose to disclose through a third party, such as a friend and it is very important that these types of disclosures are taken equally as seriously and followed up with the designated safeguarding lead. You should deal with this in the same way you would deal with a direct verbal disclosure.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation, or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

The following points give a guide about what to do and what not to do in the case of a disclosure:

1. Stay calm – the student needs us to be composed and in control.
2. Listen carefully and sympathetically, without probing.
3. Do not question or put words in the student's mouth.
4. Note the main points calmly and carefully
5. Reassure the child that it was right to tell.
6. Tell the student that you will need to inform a member of the leadership team.
7. Pass on to the designated safeguarding lead as soon as possible.
8. Follow the procedures – 'Hounslow Child Protection Procedures'.
9. Look after the student while arrangements are being made.
10. Make the rest of the day as normal as possible for everyone.
11. Write up a full account of what happened (this MUST be done before the end of the day) and make a note of any action taken so far.

## **26. Record Keeping**

At Apex Education we believe that records are required for the protection of our students and expect a high standard of record keeping to be maintained at all times; this applies to both electronic and paper files. Our records are regarded as confidential on the basis of the sensitivity of information. These confidential records are maintained with regard to the framework of the Data Protection Act (2018) and the Human Rights Act (1998). When adults in the setting have a concern about a

child or young person or after any disclosure has been the staff member should promptly inform their designated safeguarding lead and ensure that all verbal communications are promptly recorded in writing using the settings recording system. In addition to MyConcern, some hard copy files are held in locked safes on each site. Concerns relating to individual students and any safeguarding and child protection records are kept securely in the designated safe and can only be accessed by designated personnel. Brief and accurate written notes will be kept for all incidents of a safeguarding and/or child protection nature. Accurate records are vital to protect students but also to protect staff.

Detailed records should be kept when:

1. A disclosure is made by a child/young person
2. There are concerns about the welfare of children, e.g.
  - poor attendance
  - appearance and dress
  - changed behaviour or unusual behaviour
  - health and emotional wellbeing of a child
  - discussion with parents about concerns
  - home conditions
3. When there is concern regarding significant harm to a child and an interagency referral is made, as much information as possible should be given about the nature of your concerns, the child and the family. (The designated safeguarding lead would be responsible for making such a referral).
4. Reports may also need to be written for a Child Protection Case Conference or criminal/civil courts.

Records and Reports should be:

- Factual and objective
- Non judgmental
- Clear
- Accurate
- Relevant Reports should:
  - Record in detail the date/time
  - Record in detail the context
  - Record in detail the staff involved
- Be kept separate from the students' academic records and in a secure place(safe)
- Be immediately passed on to the child's new school when he/she leaves.

## **27. Communication With Parents**

Many of our students and their families are vulnerable and have complex backgrounds, this is why Apex Education staff are always on hand to speak with parents/carers about anything they wish to discuss; this could be anything from schoolwork to issues at home. Staff at Apex Education are always on hand to listen to parents/carers when things are stressful. We encourage them to engage with us so that do not feel embarrassed when it comes to approaching us for support. We like to build strong relationships with our students and their families and we are committed to working alongside them in ensuring the best for their child.

Our five main principles for working with families, parents and carers are:

- We put the needs of the child first
- We listen and take on board family and child views and wishes
- We do not blame or judge
- We accept families and children for where they are at
- We exist to support children and families to make things better
- 

Apex Education will:

- Contact parents/carers via telephone to conduct truancy and welfare calls
- Signpost parents to a service that will genuinely be able to put support in place to improve a situation
- Work using a whole family approach
- Undertake appropriate discussion with parents prior to involvement of another agency unless to do
- so would place the child at further risk of harm.
- Offer family engagement sessions where we have external people come in and we use our in house expertise to deliver sessions.
- Ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.

## **28. Curriculum**

Apex Education acknowledges the important role that the curriculum can play in the prevention of abuse and in aiding our students to prepare for the responsibilities that come with adult life. At WPES pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught how to recognise when they are at risk and how to get help when they need it.

Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of

zero tolerance for sexism, misogyny/misandry, 30 homophobia, biphobic and sexual violence/harassment. Apex Education has a clear set of values and standards which are upheld and demonstrated throughout all aspects of education and are underpinned by our behaviour policy and pastoral support system.

It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for addressing personal safety and other safeguarding and child protection related issues. It is good practice to consult a designated safeguarding lead for advice on any new curriculum ventures linked to safeguarding of child protection topics.

## **29. Staff Recruitment and Volunteers**

All staff recruited by us will be subject to reference, qualification and Disclosure & Barring Service checks prior to their appointment. WPES will inform shortlisted candidates that online searches will be done as part of due diligence checks. The Service will only use employment agencies which positively vet their staff. Staff joining the Service on a permanent or temporary basis will be appraised of the Child Protection and Safeguarding Policy.

Staff who are appointed to the Service on a temporary or permanent basis will be interviewed by at least one member of staff who has completed the Safer Recruitment training.

Volunteers - Staff Code of Conduct All staff (paid and voluntary) are expected to adhere to the Suffolk and the Apex Education Safeguarding policies.

Children and young people will be treated with respect and dignity and no punishment, restraint, sanctions or rewards are allowed outside of those detailed in the Behaviour policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children/young people, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents do occur that may be misconstrued, they should be recorded and reported to the designated safeguarding lead. Further action will be taken if necessary.

Only qualified First Aiders identified by the Service should administer First Aid and medication. If it is necessary for the child to remove clothing for any kind of treatment, there should wherever possible be another adult present. All head injuries will be recorded and parents/carers informed. If a child requires further treatment, e.g. hospitalisation, this will be recorded and parents informed.

For their own safety and protection, staff should exercise caution in situations where they are alone with students. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby.

Service staff should also be alert to the possible risks that may arise from contact with students outside school. Home visits should only take place with the knowledge and approval of the DSL. Visits/telephone calls /texts/social media communication/email from students to the homes (personal email addresses) of staff members is not allowed.

### **30. Allegations Involving School Staff/Volunteers**

At Apex Education we recognise the possibility that adults working in the education sector may harm children. We expect ALL staff and adults who work with us or visit us to be vigilant to inappropriate conduct with children and to report any concerns following our complaints procedure.

We take all complaints made against members of staff very seriously and there are clear procedures in place for allegations against staff and volunteers.

An Allegation is any information, which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children
- This applies to any child the member of staff/volunteer has contact within their personal, professional or community life

If ever needed, staff can contact the Local Authority Designated Officer (LADO)

The LADO will provide advice and guidance to schools and colleges when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, local authority children's social care, the school or college, or a combination of these. In straightforward cases, a senior member of school or college staff will normally undertake the investigation. If advised by LADO, referring to DBS or Teachers services to indicate potential prohibition from teaching.

Low-Level Concerns The term 'low-level' concern does not mean that it is insignificant. 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 or college may have acted in a way that: Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Low-level concerns need to be reported in the same way as any other concern.

The designated safeguarding lead should be the ultimate decision maker in respect of all low-level concerns. If staff 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, they should consult with their LADO.

### **31. Whistleblowing**

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the whistle blowing policy. At present Apex Education follow The Suffolk Whistleblowing Policy. By following this policy, we can ensure that staff are provided with a clear and safe route for reporting concerns, as well as clear process for whistleblowing concerns to be addressed and a guaranteed response to the concerns that they have raised.

If a worker has a concern about possible 'wrongdoing' at work, they should report it under this Policy. A whistleblowing disclosure/ 'wrongdoing' can be any of the following (please note: This list is not exhaustive).

- A criminal offence has been committed, is being committed or is likely to be committed.
- A legal obligation has been breached

- There has been a miscarriage of justice
- Bribery
- The health and safety of any individual has been compromised
- The environment has been damaged
- Information about any of the above has been concealed.

Acts of 'Wrongdoing' can place the pupils, education of the pupils and reputation of the setting and Council in jeopardy if not prevented.

### **32. Transport**

We will provide a shuttle service to and from our setting, as well as transport students to sporting venues across suffolk. Where possible we will have 2 members of staff in the vehicle. Where this is not possible a dashcam will be set up to view all people in the vehicle. Students will also be sat as far away as possible from the driver if there is a 1 on 1 situation. Appropriate insurance will be obtained for the use of the vehicle. Students who are not at their pick up time at the agreed time will have 5 minutes to arrive before they are considered absent. During this time a call to the parent/carer to establish the reason will be made.

