

# **Child Protection and Safeguarding Policy**

This policy will be reviewed annually; however, should a need arise, it will be reviewed when required.

This policy will be read, understood, and signed by all staff yearly and when changes are made in line with government and DfE guidelines.

# **Document Control:**

• Date reviewed: 03-06-2025

• Approval: Gemma Robertson

• Date of next review: 03-09-2025

# **Change History**

Date	Description of change	Signed

# **Key Personnel**

Role	Name	Contact Details
Designated Safeguarding Lead (DSL)	Gemma Robertson	g.robertson@alternativeacres.co.uk 07312132515
Deputy DSL(s)		
Head of Education	Gemma Robertson	g.robertson@alternativeacres.co.uk 07312132515



Local Authority contacts for Safeguarding and Child Protection  If concerns are present that a child is at immediate risk of harm or in need of			
protection, call 999			
Children and Families Direct (Social Care	CityMash@nottinghamcity.gov.uk		
Enquiries)	0115 876 4800		
Nottinghamshire County MASH	0115 9774247		
Local Authority Designated Officer	lado@nottinghamcity.gov.uk		
(LADO)			

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# 1. Safeguarding Statement

At Alternative Acres, the safety, protection, and wellbeing of every young person in our care is our highest priority. We are dedicated to providing a secure, nurturing, and therapeutic environment where learners can grow socially, emotionally, and physically.

All members of our team, including leadership, fully understand the crucial role we play in safeguarding. We are committed to the early identification of concerns and timely intervention to protect young people from harm.

Our safeguarding approach is guided by the National Child Safeguarding Practice Guidance, Working Together to Safeguard Children (2023), and Keeping Children Safe in Education (2024). We work in close collaboration with families, safeguarding partners, and external agencies to ensure effective and joined-up support for every learner.

By placing the child at the centre of everything we do, we foster a culture where every staff member, volunteer, and visitor understands their safeguarding responsibilities. Our culture is grounded in trust, open communication, confidentiality, mutual respect, and continuous professional development.

We regularly review and strengthen our safeguarding policies and procedures to ensure they remain inclusive, effective, and aligned with current legislation and best practice. This reflects our unwavering commitment to the protection and welfare of all young people at Alternative Acres.

We recognise that some children may face greater risks of harm—both online and offline—and may encounter additional barriers to recognising or disclosing abuse. We are committed to anti-discriminatory practice and to understanding and addressing each young person's individual circumstances.

We pay particular attention to those who may be more vulnerable, including children and young people who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May face discrimination due to race, ethnicity, religion, gender identity, or sexuality
- Have English as an additional language
- Live in challenging home situations, such as temporary accommodation, domestic violence, or substance misuse
- Are at risk of FGM, child sexual exploitation, forced marriage, or radicalisation



- Are asylum seekers or refugees
- Are affected by mental health issues (their own or within their family)
- Are looked-after or previously looked-after
- Are regularly absent from education or missing for extended periods
- Have parents or carers considering elective home education

At Alternative Acres, safeguarding is a shared responsibility. Together, we are committed to building a safe, inclusive, and empowering environment where every child and young person has the opportunity to thrive.

### 2. Principles

At Alternative Acres, safeguarding and the promotion of our young people's welfare are central to everything we do. We are committed to creating a safe, supportive, and therapeutic environment where every child is protected from harm, nurtured in their development, and empowered to thrive.

We believe that every young person, regardless of age, gender, ability, culture, language, race, religion, or sexual identity has the right to feel safe, be listened to, and receive the protection they need. The wellbeing of our learners is at the heart of every decision and action we take across the provision.

All members of staff at Alternative Acres share both an individual and collective duty to respond quickly and appropriately to any concerns, disclosures, or suspicions that a child may be at risk. Our safeguarding practice is firmly rooted in the statutory guidance set out in Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023). We work in close partnership with the Nottingham City Safeguarding Children Partnership and other key agencies to uphold strong and effective safeguarding standards.

As part of our duty to promote fundamental British values including democracy, individual liberty, mutual respect, and the rule of law, we actively cultivate a culture in which safeguarding, respect, inclusion, and positive relationships go hand in hand.

As a therapeutic and inclusive setting, we recognise our statutory and moral responsibility to protect and promote the welfare of every learner. We remain alert to the signs of abuse, neglect, and exploitation, and we are dedicated to providing a setting where children feel safe, valued, and supported.

Our safeguarding procedures are robust, consistent, and regularly reviewed to ensure that every child receives the care, protection, and advocacy they deserve. At Alternative Acres, safeguarding is not just a policy, it is a fundamental commitment that shapes our daily practice and underpins our ethos.



### 3. Key Objectives of this Policy

The provision aims to ensure that:

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

# Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023), and the Governance Handbook.

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on provisions and local authorities to safeguard and promote the welfare of pupils
- The provision Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in Safer Recruitment.

### 4. Definitions of Safeguarding

# Safeguarding and promoting the welfare of children means:

- 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
- Taking action to enable all children to have the best outcomes

Safeguarding can involve a range of potential issues such as (this list is not exhaustive):

- Child sexual exploitation (CSE)
- Bullying, including cyberbullying (by text message, on social networking sites, and so on) and prejudice-based bullying
- Domestic violence (DV)
- Drugs / substance misuse
- Fabricated or induced illness (FII)
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based violence/violence against women and girls (VAWG) including HBV.



- Mental health
- Private fostering
- Racist, disability, and homophobic or
- transgender abuse
- Radicalisation and extremist behaviour
- Sexting
- Sexual exploitation
- Teenage relationship abuse
- Upskirting
- Trafficking
- Children and the court system (as witness)
- Children with family members in prison
- Criminal exploitation (County Lines)
- Homelessness

Children: Includes everyone under the age of 18.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. There are 4 forms of abuse which can be categorised into distinct types:

- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Neglect

Neglect is a form of abuse and 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.

Appendix 1 defines neglect in more detail.

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area



Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

### 5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and external leaders in the provision and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended provision and off-site activities.

Alternative Acres acknowledges and understands its role as a crucial component of preventative education. This is in the context of a whole-provision approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive
- and delivered regularly, tackling issues such as:
- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming,
- coercion, harassment, rape, domestic abuse, so-called honour-based violence such as
- forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always
- unacceptable



#### The Law around 'Position of Trust'

Under the Sexual Offences Act 2003, it is unlawful for an adult to engage in a sexual relationship with a child under 16 years of age. Furthermore, it is also an offence for an adult who occupies or has previously occupied a 'position of trust' in relation to a young person under 18 to have a sexual relationship with them.

This includes relationships between provision staff members and pupils. It is important to note that this provision applies regardless of whether the young person is above the legal age of consent or has left provision.

The Sexual Offences Act 2003 encompasses various activities, such as engaging in sexual activity with a child, causing or inciting a child to engage in sexual activity, engaging in sexual activity in the presence of a child, and causing a child to witness a sexual act.

### 5.1 All staff responsibilities

#### All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online
- Provide a safe space for pupils who are LGBTQ+ to speak out, be proud and share their concerns

#### All staff will be aware of:

- Our policies and procedures which support safeguarding, including this child protection and safeguarding policy, the Staff code of conduct, the role and identity of the DSL/DSD, the behaviour policy, eSafety policy and the safeguarding response to children who go missing from education
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to



maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring those making disclosures that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at provision and online
- The fact that children who are (or who are perceived to be) LGBTQ+ can be targeted by other children
- What to look for to identify children who need help or protection

### 5.2 Safeguarding Team responsibilities

The DSL and DSDs form the Safeguarding Team. The DSL is Head of Provision and takes lead responsibility for child protection and wider safeguarding in the provision. This includes online safety, including understanding our filtering and monitoring processes on provision devices and provision networks to keep pupils safe online.

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

Gemma Robertson can also be contacted out of hours on 07312132515 When the DSL is absent, the DSD (To be appointed) will cover and act as DSL.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of Harmful Sexual Behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our provision
- Make sure that staff have appropriate Prevent training and induction



#### The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the provisions policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

# 6. Reporting concerns

At Alternative Acres, we prioritise the safety and well-being of our students. In the event of any concerns regarding child safeguarding, we have designated individuals who should be contacted immediately. These individuals form the provision Safeguarding Team which will be expanded and developed as the provision grows.

### **Designated Safeguarding Lead:**

Gemma Robertson is the Designated Safeguarding Lead.

# **Designated Safeguarding Deputy:**

To be appointed is the Designated Safeguarding Deputy

After speaking with a member of the Safeguarding Team staff will complete a detailed report using appropriate category selections on CPOMS. It is crucial to report any concern promptly to ensure the safety and well-being of the child involved. If, at any point, there is an immediate risk of serious harm to a child, it is essential to make an immediate referral to Children's Social Care or the police. While anyone can make such a referral, and it is vital to take swift action when the well-being of a child is at stake, the Safeguarding Team are the individuals identified internally to make such referrals.

# 7. Managing Disclosures

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

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 is in immediate danger. Anyone can make a referral.



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

#### **Disclosures of Abuse**

# 1. 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
- Speak to a member of the Safeguarding Team and share the information that has been disclosed to you.
- 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
- Log your report on CPOMS using appropriate category selections.

Bear in mind that some children may:

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

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

### 2. Early help assessment

If an early help assessment 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, the gathered professionals will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the provision 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.

#### 3. Referral



If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. In Nottingham City the referral is completed via the MARF (Multi agency referral form to be completed online when reporting concerns to Children and Families Direct)

https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/multi-agency-safeguarding-children-hub-mash/

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.

# **Other Types of Disclosure**

### 4. If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSiE) 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 pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk are identified later in this policy.

# Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless the teacher has been specifically told not to disclose by the police, they should also discuss the case with the DSL who will involve children's social care as appropriate.



The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. If FGM is suspected then this should be referred to the DSL who will escalate and refer this appropriately. Staff should not examine pupils.

Any other member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out they should speak to the DSL and follow our local safeguarding procedures.

### 5. If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, speak to the DSL or DSD first to agree a course of action. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which provision staff can call to raise concerns about extremism with respect to a pupil. You can also email <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a> 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

# 6. Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. 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 pupils hurting other pupils will be dealt with under our provisions behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:



- Is serious, and potentially a criminal offence
- Could put pupils in the provision at risk
- Is violent
- Involves pupils 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 the sharing of nudes and semi-nudes)

# Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation on 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 any others affected)
- with a named person they can talk to if needed. This will include considering provision transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

# Creating a supportive environment in provision and minimising the risk of child-onchild abuse

We recognise the importance of taking proactive action to minimise the risk of child-onchild abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent



- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration.
- We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
- > How to recognise the indicators and signs of child-on-child abuse,
- How to identify it and respond to reports
- How to recognise that a child may need to disclose
- > Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- > A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- 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
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That even if there are no reports of child-on-child abuse in provision, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.



Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our provision from coming to its own conclusion about what happened and imposing a penalty accordingly.

We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution, we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

## Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate provision staff, this will include the staff member who reported the incident and the Safeguarding Team. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response including from whom statements should be collected
- Whether the image(s) 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 or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another provision, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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 SEN)



- What the DSL knows about the images or videos 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 pupil in the images or videos is under
   13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the Safeguarding Team and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

## 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 to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil 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/carers**

The DSL will inform parents/carers 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 pupil at risk of harm.

### Referring to the police

If it is necessary to refer an incident to the police, then this will be done by the DSL.

### **Record-keeping**

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on CPOMS. If you are in any doubt about whether to record something, discuss it with a member of the Safeguarding Team.

#### Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved



- A note of any action taken, decisions reached and the outcome
- Any referrals made
- Lessons learned from the incident

Referrals will be kept in a separate child protection file for each child which is accessible only by the Safeguarding Team and noted on CPOMS appropriately. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the provision.

Any non-confidential records will be readily 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.

If a child for whom the provision has, or has had, safeguarding concerns moves to another provision, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new provision/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

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 provision and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

#### **Further information**

- Records are electronically stored
- Kept on our provisions google drive and our online digital recording system (CPOMS)
- Our child protection forms are kept in a secure safeguarding folder permissions only granted to DSL and Deputy DSL.

# 9. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our provision aims to:



- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, and volunteers.
- Protect and educate the whole provision community in its safe and responsible use of
- technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole provision community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

# The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- Content being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

# To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring.

All staff members will receive refresher training as required and at least once each academic year



- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- 1. Staff are allowed to bring their personal phones to provision for their own use, but will limit such use to non-contact time when pupils are not present
- 2. Staff will not take pictures or recordings of pupils on their personal phones or cameras
  - Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
  - Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above).
  - Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our provision community
  - Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively. We have a dedicated space to safeguarding updates in our weekly team meeting.
  - Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
  - All student records and Safeguarding records are stored securely using CPOMS

### 8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Alternative Acres recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Alternative Acres will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the provision.

# 8.2Sharing of nudes and semi-nudes ('sexting')



If you are made aware of an incident involving the consensual or non-consensual sharing of nude or

semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately and log the incident on CPOMS. You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

#### You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil 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 pupil to delete it
- Ask the pupil(s) 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 pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

### Curriculum coverage

In order to support and equip students to safely navigate this topic students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PHSE programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- 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 and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

# 9. Supporting pupils

At Alternative Acres, we deeply understand the profound impact that abuse or exposure to violence can have on a child or young person. We recognise the challenges they may face in developing and maintaining a sense of self-worth. In such circumstances, pupils may feel helpless, humiliated, and even blame themselves. As a provision, we acknowledge our role in providing stability and support for pupils who have experienced abuse or are at risk of harm.



We acknowledge that the behaviour of these pupils may vary, ranging from what is commonly perceived as normal to displays of aggression or withdrawal. It is our commitment to support all pupils in various ways, including:

- Discussing child protection cases with utmost sensitivity, taking into consideration the well-being of the pupil and their family.
- Providing support and intervention for individuals identified as being in need or at risk, in alignment with the procedures outlined by the NCSCP.
- Promoting self-esteem and self-assertiveness among our pupils, empowering them to recognise their own value and assert their boundaries.
- Challenging and actively addressing aggression, bullying, and discriminatory behaviour, fostering a culture of empathy, respect, and inclusivity.
- Cultivating a caring, safe, and positive environment within the provision, where every pupil feels valued, supported, and protected.

### 10. Supporting vulnerable groups

### Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding

challenges, and are 3 times more likely to be abused than their peers. 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 condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudicebased bullying) than other pupils
- The potential for pupils with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- We offer extra pastoral support for these pupils. This includes support in class and extra time out of lesson if needed to complete work in a more suitable room that is away from the main classroom, this is supported by our student support team. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy).

### Pupils with a social worker

Pupils 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 vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.



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

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

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

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# Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep lookedafter children and previously looked-after children safe. In particular, we will ensure that:

- The DSL is also the Designated Teacher for Looked After Children
- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The Safeguarding Team will ensure they have the details of children's social workers

### 11. Working with Parents/Carers

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

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

If we believe that notifying the parents or carers 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 or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):



- Meet with the victim's parents or carers, with the victim, to discuss what's being
  put in place to safeguard them, and understand their wishes in terms of what
  support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

# 12. Staff Training

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the provisions safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-provision safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

All staff will receive training and have regard to the Teachers' Standards and EFT Standards of Professionalism to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils
- Understand that Safeguarding is everyone's responsibility

All staff will have training on the government's anti-terrorism strategy CONTEST and upon the specific duty that education has within that. All staff will undertake targeted training on Prevent provided by the Home Office to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The DSL is also the Prevent lead and will access external training to cascade as risks arise.

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

Volunteers will also receive appropriate training.

## The DSL and DSD

The DSL and DSD will undertake child protection and safeguarding training at an appropriate level (Level 3 or higher) 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).

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

# **Debrief and Supervision**

All staff will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. Debriefs, either group or individual, will be conducted following significant incidents; further debriefs or specialist support will be provided to staff as and when necessary in order to promote and maintain the wellbeing of staff working in challenging situations.

#### 13. Contractors and External Staff

#### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the provision has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). 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 check the identity of all contractors and their staff on arrival at the provision. We will obtain the DBS check for self-employed contractors. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will not keep copies of such checks for longer than 6 months.

# **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.

All trainee or student teachers will be included on the SCR.



#### **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

# 14. Types and Signs of Abuse or Neglect

There are four forms of child abuse recognised in legislation:

- Physical abuse
- Neglect
- Sexual abuse
- Emotional abuse.

It is important to note, however, that these types of abuse are more typically found in combination than alone. A physically abused child, for example, is often emotionally abused as well, and a sexually abused child also may be neglected.

Recognising and responding to signs of abuse or neglect is of utmost importance at Alternative Acres. We are committed to providing a safe environment for all our students.

The below are signs often associated with particular types of child abuse and neglect:

### Signs of Physical Abuse:

- Unexplained burns, bites, bruises, broken bones, or black eyes in the child.
- Bruises or marks that become noticeable after a period of absence from provision.
- Displaying fear or resistance towards parents or caregivers and showing distress when it's time to go home.

### Signs of Neglect:

- Frequent absences from provision.
- Begging or stealing food or money.
- Lack of necessary medical or dental care, immunizations, or glasses.
- Consistently appearing dirty with severe body odour.
- Inadequate clothing for the weather conditions.
- Substance abuse or drug involvement.



- Exhibiting a shrinking or fearful response in the presence of adults.
- Reporting injuries caused by a parent or adult caregiver.
- Conflicting, unconvincing, or no explanation provided by the parent or caregiver regarding the child's injuries.
- Describing the child in extremely negative terms or exhibiting harsh physical discipline.

- Stating that there is no one at home to provide care.
- Showing indifference, apathy, depression, irrational behaviour, or bizarre mannerisms in the parent or caregiver.

### Signs of Sexual Abuse:

- Difficulty walking or sitting.
- Refusal to change for physical activities or participate in them.
- Nightmares or bedwetting.
- Sudden changes in appetite.
- Displaying knowledge or engaging in sexual behaviours that are inappropriate for their age.
- Pregnancy or contracting sexually transmitted infections, particularly if under the age of 14.
- Running away.
- Disclosing sexual abuse by a parent or adult caregiver.
- Overly protective behaviour or limiting contact with other children, especially of the opposite sex in the parent or caregiver.
- Exhibiting secretive and isolated behaviour.
- Jealousy or controlling behaviour towards family members.

# Signs of Emotional Abuse:

- Extreme behaviour such as being overly compliant, demanding, passive, or aggressive.
- Inappropriately assuming adult or infantile behaviours.
- Delayed physical or emotional development.
- Suicide attempts.
- Expressing a lack of attachment to the parent.
- Constantly blaming, belittling, or berating the child in the parent or caregiver.
- Showing indifference towards the child and rejecting offers of help for the child's problems.

# Female Genital Mutilation (FGM)

It is illegal in the United Kingdom to allow girls to undergo female genital mutilation either in this country or abroad. People guilty of allowing FGM to take place are punished by fines and up to fourteen years in prison.



There is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Training is delivered to staff so that this issue is fully understood. All other staff should speak to the DSL (or DSD) with any concerns about female genital mutilation (FGM), The DSL has undertaken additional training.

# 15. Concerns or Complaints about a staff member – including Low Level Concerns

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head of Provision as soon as possible. The headteacher will then follow the procedures set out by the Local Authority and Allegations Against Staff Procedure, if appropriate. If your concern is about the HoP/DSL/DSD, you should report such allegations to:

# **Local Authority Designated Officer (LADO)**

Chloe Patel lado@nottinghamcity.gov.uk 0115 8765501

# **Local Authority Designated Officer (LADO) Business Support**

Maria Kyrris lado@nottinghamcity.gov.uk 0115 8764776

### **Provisions and Education Safeguarding Coordinator**

Claire Maclean
Claire.maclean@nottinghamcity.gov.uk
0115 8764749
Nottingham City Council,
Loxley House,
Station Street,
Nottingham
NG2 3NG

### If none of the above are contactable, please call:

Nottingham City Safeguarding Children Partnership 0115 8764762

#### Type of concern

A low-level concern is any concern that an adult has acted in a way that:



- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

# Examples of such behaviour could include:

- being over friendly with children
- having favourites
- adults taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

An allegation is a concern that the member of staff (including a supply teacher, volunteer or contractor) has or will lead to a child being harmed. If the concerns/allegations are about the Head of Provision then staff should speak to

# **Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our Safeguarding policy.

# **Appendix 1 Safeguarding Glossary**

#### **ABUSE TYPES**

The following are categories of child abuse:

the Local Authority Designated Officer (LADO).

- Physical abuse
- Neglect
- Sexual abuse
- Emotional abuse.

It is important to note, however, that these types of abuse are more typically found in combination than alone i.e. a physically abused child is often emotionally abused as well, and a sexually abused child also may be neglected.



Recognising and responding to signs of abuse or neglect is of utmost importance at Alternative Acres. We are committed to providing a safe environment for all our students.

# CHILDREN MISSING FROM EDUCATION (CME)

A Child Missing from Education is defined as any child (or young person i.e. anyone who has not yet reached their 18th birthday) who is not on a provision roll, nor being educated otherwise (e.g. at home, privately, or in alternative provision) and who has been out of any education provision for a substantial period of time (practice nationally is four provision weeks or more). Children with poor provision attendance are often vulnerable and at increased risk of becoming children missing from education.

### CHILDREN MISSING FROM HOME OR CARE

When a child goes missing or runs away they are at risk. Local authorities are responsible for protecting children whether they go missing from their family home or from local authority care.

### **CHILD ON CHILD ABUSE**

Safeguarding issues can manifest themselves via child on child abuse; it involves acts of harm, cruelty, or violence inflicted by one child onto another, either physically, emotionally, or sexually.

This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Harmful Sexual Behaviour (HSB) such as
  - Sexual violence such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - Sexting (also known as youth produced sexual imagery)
  - Initiation/hazing type violence and rituals.

The impact of child on child abuse can be profound, as it can result in lasting psychological and emotional scars for both the victim and the perpetrator. These harmful behaviours can manifest in various forms, such as bullying, physical assaults, verbal abuse, exclusion, online abuse, sexual harassment, or coercion. Child on child abuse can have serious implications for a child's well-being, hindering their social and emotional development, leading to anxiety, depression, or other mental health issues.



Recognising these signs is crucial, as it allows for early intervention and support to address the underlying causes and protect the well-being of all children involved.

Our procedures to minimise the risk of online child on child abuse include, comprehensive filtering and monitoring systems as well as educational support to equip students to recognise and manage their online interactions safely. If a student has become affected by an incident they have ample opportunity to be supported with this.

We acknowledge that child on child abuse may persist even in the absence of reported incidents. We have a ZERO tolerance attitude towards child on child abuse, we never pass it off as banter or part of growing up. All child on child abuse is unacceptable and will be taking seriously in line with our behaviour policy.

Alternative Acres takes a zero-tolerance approach to students sharing explicit content, whether consensual or non-consensual, as it is a serious violation of our code of conduct. We prioritise the safety and well-being of our students and will respond with appropriate measures to prevent and address such incidents, including disciplinary actions and educational initiatives to promote responsible digital behaviour.

# **CHILD SEXUAL EXPLOITATION (CSE)**

Child sexual exploitation (involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship; the perpetrator always holds some kind of power over the victim that increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **CONTEXTUAL SAFEGUARDING**

Safeguarding incidents and/or behaviours can be associated with factors outside the provision or college and/or can occur between children outside the provision or college. All staff, but especially the Safeguarding Team should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that provisions and colleges provide as much information as possible as



part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

#### **BULLYING INCLUDING CYBERBULLYING**

The rapid development of, and widespread access to, technology has provided a new medium for 'virtual' bullying, which can occur in or outside provision. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click.

The wider search powers included in the Education Act 2011 give teachers stronger powers to tackle cyber-bullying by providing a specific power to search for and, if necessary, delete inappropriate images (or files) on electronic devices, including mobile phones (see Behaviour Policy).

### **DOMESTIC VIOLENCE**

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

- Psychological
- Physical
- Sexual
- Emotional
- Financial

Children who have experienced Domestic Violence are legally identified as having been abused.

#### **CONTROLLING BEHAVIOUR**

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

# **COERCIVE BEHAVIOUR**

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to control, harm, punish, or frighten their victim.

### CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by



parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and

parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

#### **DRUGS**

As part of the statutory duty on provisions to promote pupils' wellbeing, provisions have a clear role to play in preventing drug misuse as part of their pastoral responsibilities. "Drugs" refers to substance abuse and all drugs including medicines, volatile substances, 'legal highs', alcohol, tobacco and illegal drugs.

# **FABRICATED OR INDUCED ILLNESS (FII)**

Fabricated or induced illness is a rare and potentially dangerous form of abuse. FII is the systematic fabrication or induction of illness in a child or young person, causing them to be seen as ill.

It can also be known as:

- Munchausen' Syndrome by Proxy
- Fabricated Illness by Proxy
- Factitious Illness by Proxy
- Illness Induction Syndrome

This can be done in three main ways (which are not mutually exclusive):

- Fabrication of symptoms (including fabrication of past medical history) or exaggeration of symptoms
- Falsification of hospital charts, including manipulation of test results to result in misdiagnosis
- Deliberate Induction of illness, for example, by poisoning the child or young person.

Clinical evidence indicates that cases of FII are usually carried out by a female carer, usually the child's mother. However, it is important to remember that there have been cases where a child's father, foster parent, grandparent, guardian or a healthcare professional were responsible.

#### **FAITH ABUSE**

This include:



- A belief in concepts of witchcraft and spirit possession
- Demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- The evil eye or djinns (traditionally known in some Islamic faith contexts)
- Dakini (in the Hindu context)
- Ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- Use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

# **FEMALE GENITAL MUTILATION (FGM)**

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff that activate local safeguarding procedures if they suspect a child is a victim or is a potential victim of FGM.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM; Nottingham has a low prevalence of communities who practice FGM (as of September 2024).

FGM has been a criminal offence in the UK since the Prohibition of Female Circumcism Act 1985 was passed. The FGM Act 2003 replaced the 1985 Act and makes it an offence on the first time for the UK nationals or permanent UK residents to carry out FGM abroad or to aid, abet, counsel or procure FGM abroad even in countries where legal.

## Risk factors from FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls whose parents try to withdraw from PSHE
- 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

#### **FORCED MARRIAGE**

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be:

- physical (including threats, actual physical violence and sexual violence)
- emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family).
- financial abuse (taking wages or not giving you any money to live)

#### **GANGS AND YOUTH VIOLENCE**

The vast majority of young people and education establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact. provisions have a duty and a responsibility to protect their pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime.

Dealing with violence also helps attainment. While pupils and pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any educational establishment. provisions and colleges are places where important interventions can take place to prevent violent behaviour, including more serious violence such as young people carrying a knife, and violence that takes place in the community.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from provision, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these.

Advice and guidance on this is provided by the Home Office.

#### 'HONOUR BASED' VIOLENCE



So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

# GENDER-BASED VIOLENCE / VIOLENCE AGAINST WOMEN AND GIRLS (VAWG)

Violence Against Women and Girls (VAWG) has been defined by the United Nations (UN) as "any act of gender-based violence that is directed at a woman because she is a woman or acts of violence which are suffered disproportionately by women." This includes physical, sexual and economic abuse, violence or sexual exploitation. VAWG includes violence that is targeted at women or girls because of their gender or affects women and girls disproportionately. The strands of VAWG as outlined by the government are:

- Domestic Violence and Abuse
- Rape and Sexual Violence
- Prostitution and Trafficking
- Sexual Exploitation
- Female Genital Mutilation (FGM)
- Forced Marriage
- Honour Based Violence
- Stalking and Harassment

#### MENTAL HEALTH

At least one in four of the population will experience a mental health problem at some point, and around half of people with lifetime mental health problems experience their first symptoms by the age of 14. The issues can relate to the child themselves, to their family, or to their community or life events. A pupil's behaviour, whether it is disruptive, withdrawn, anxious, depressed or otherwise - may be related to an unmet mental health need.

Only medical professionals will make a formal diagnosis of a mental health condition. Education staff are well-placed to observe children day-to-day and identify those whose behaviour suggests that they may be suffering from a mental health problem or be at



risk of developing one. This may include withdrawn pupils whose needs may otherwise go unrecognised. Concerns regarding the mental health and wellbeing of students are recorded on CPOMS and referrals to appropriate therapeutic or medical professionals will be made by the DSL/DSDs

#### CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

Children with special educational needs or disabilities (SEND) or certain medical or physical health

conditions can face additional safeguarding challenges both online and offline.

#### These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in provisions or colleges or the

consequences of doing so.

# **PUPIL WELL-BEING**

Pupils need support throughout their provision career; at times this support need will be greater and at times this will be lesser. Staff must be vigilant regarding stress and any related mental health issues for pupils, self-harm and any other concerns relating to a pupil's wellbeing. All such concerns must be reported following the provision's child protection procedures.

# **PRIVATE FOSTERING**

A private fostering arrangement is essentially one that is made privately (that is to say without the

involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more.

Private foster carers may be from the extended family. However, a person who is defined as a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle, aunt (whether of the full or half blood or by marriage) or step-parent will not be a private



foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break.

Exemptions to this definition are set out in Schedule 8 to the Children Act 1989. Private fostering arrangements can be a positive response from within the community to difficulties experienced by families. Nonetheless, privately fostered children remain a diverse and potentially vulnerable group and private fostering arrangements must be reported to children's services by the provision.

Any provision staff should notify the Safeguarding Team when they become aware of private fostering arrangements as all educational provisions 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 provisions have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the provision. It should be clear to the provision who has parental responsibility including any changes in this. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA.

#### **RADICALISATION**

The aim of the Prevent element of the CONTEST strategy is to stop people becoming or supporting terrorists, by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working to safeguard children and young adults, providing early intervention to protect and divert away from being drawn into terrorist activity.

#### **SEXTING**

Sexting is when someone sends or receives a sexually explicit text, image or video on their mobile phone, usually in a text message. This can lead to "sextortion" which is a form of sexual exploitation that employs non-physical forms of coercion to extort sexual favours from the victim. Sextortion refers to the broad category of sexual exploitation in which abuse of power is the means of coercion, as well as to the category of sexual exploitation in which threatened release of sexual images or information is the means of coercion. (see eSafety policy)

# **TEENAGE RELATIONSHIP ABUSE**

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those who are or have been intimate partners regardless of gender or sexuality. This term is not included in the Domestic Abuse Act 2021 (which requires at least one partner to be 16+); relationship abuse in younger teenagers is often digital in format

but physical and emotionally abusive acts are also known. These include:



- Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Where there are concerns or it is known that there is violence present in a teenage relationship it will be dealt with as a safeguarding concern.

#### SEXUAL VIOLENCE AND SEXUAL HARRASSMENT BETWEEN CHILDREN

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.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Not dismissing or tolerating such behaviours risks normalising them which is unacceptable.

### **UPSKIRTING**

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a specific criminal offence.

#### **TRAFFICKING**



Children may be trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working with drugs. There is evidence that some children are trafficked through numerous countries before arriving in the UK. There are many legitimate reasons why children are brought to the UK, such as economic migration with their family, education, re-joining their family or fleeing a war-torn country. Some children will have travelled with their parents or carers.

However, a number of children arrive in the UK accompanied by adults who are either not related to them or in circumstances which raise child protection concerns. For example, there may be little evidence of any pre-existing relationship between the child and the accompanying adult or even no knowledge about the person who will care for the child. There may be unsatisfactory accommodation in the UK, or perhaps no evidence of parental permission for the child to travel to the UK or stay with the sponsor. These irregularities may be the only indication that the child could be a victim of trafficking.

# **CHILDREN AND THE COURT SYSTEM (AS WITNESS)**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

#### **CHILDREN WITH FAMILY MEMBERS IN PRISON**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

# **CRIMINAL EXPLOITATION OF CHILDREN (COUNTY LINES)**

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved and is defined as: Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18.

The victim has legally been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just



county lines and includes for instance children forced to work on cannabis farms or to commit theft.

#### **HOMELESSNESS**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DSDs should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include poor condition or clothing of the child, household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

# Appendix 2 - Safer Recruitment

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate Safer Recruitment training. Safer Recruitment checks on candidates are carried out by our dedicated Recruiter.

The following steps are in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### **Advertising**

When advertising roles, we will make clear:

- Our provisions commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974
  and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is
  exempt, certain spent convictions and cautions are 'protected', so they do not
  need to be disclosed, and if they are disclosed, we cannot take them into
  account

# **Application forms**

Our application forms will:



- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

# **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
- 1. If they have a criminal history
- 2. Whether they are included on the barred list
- 3. Whether they are prohibited from teaching (Section 128 check this will be confirmed through the DfE portal before employment is confirmed)
- 4. Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- 5. Any relevant overseas information
  - Sign a declaration confirming the information they have provided is true. We will
    also consider carrying out an online search (including Social Media) for
    shortlisted candidates to help identify any incidents or issues that are publicly
    available online. Shortlisted candidates will be informed that we may carry out
    these checks as part of our due diligence process.

#### Seeking references and checking employment history

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is provision based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations



- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

#### Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the provisions 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**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment

checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity. We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- 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



- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- 1. For all staff, including teaching positions: criminal records checks for overseas applicants
- 2. For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- 3. 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. Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

# Regulated activity

Within education and care this term means a person who will be:

- Responsible, on a regular basis in a provision or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a provision or college 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**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children
- An individual moves from a post that is not regulated activity to one that is
- There has been a break in service of 12 weeks or more

### **Existing staff**

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

- We believe the individual has engaged in relevant conduct
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)



 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 staff

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. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

All agency and third party staff will be included on the SCR on their first day of work.

# Appendix 3 - Special Safeguarding issues

# Children who are Missing from Education (CME) or repeatedly absent from school

A child being absent from education, particularly repeatedly, 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 be absent or become missing 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
- Come from new migrant families

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



Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, 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.

### Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

#### Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for



the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

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

# Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Alternative Acres has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')



- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this
  may include an online element which facilitates, threatens and/or encourages
  sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, 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 don't want to receive such content.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma requiring support themselves.

#### **Domestic abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescence to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.



Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse have also been abused.

#### Homelessness

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

The Safeguarding Team is 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).

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

#### **FGM**

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

# A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE



- Being repeatedly absent from school, 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 pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised 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/carers stating that they or a relative will take the
  girl out of the country for a prolonged period 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
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent or vaccinations/anti-malarial medication
- Requesting help from a teacher or

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

### Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

#### The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to appropriate therapeutic services

**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.

The Counter Terrorism Act 2015 identifies that education has a duty to prevent children from being drawn into terrorism. The DSL is the designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They will 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 provision 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. A locality risk assessment including Radicalisation risks is in place for Alternative Acres.

We will ensure that suitable internet filtering and monitoring are in place and regularly checked in addition to equipping our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Radicalisation can occur quickly or over a long period. Staff are alert to changes in pupils' behaviour and presentation.

The government website Educate Against Hate and charity NSPCC identify that signs that a pupil 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.

Staff should always take action if they are worried.



### Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and LGBTQ+ children are at greater risk.

Staff at Alternative Acres are aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (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



### Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Having been involved in other forms of CCE
- Having experienced child abuse or neglect

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

#### Checking the identity and suitability of visitors

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. All visitors will be required to verify their identity to the satisfaction of staff.

Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the provision any speaker who is known to disseminate extremist views. We will also carry out appropriate checks to ensure that



any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff before inviting a speaker into the provision.