



## 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: 03-09-2025
- Approval: Gemma Robertson
- Date of next review: 03-09-2026

### Change History

Date	Description of change	Signed
03-09-2025	KCSiE year from 2024 → 2025	G.Robertson
03-09-2025	Added alternative provision responsibilities (communication with schools/authorities, Virtual School Heads, safeguarding alignment).	G.Robertson
03-09-2025	Included kinship care	G.Robertson
03-09-2025	New online safety / AI safeguarding risks.	G.Robertson
03-09-2025	Noted the EYFS 2025 changes in safer recruitment and emergency contacts.	G.Robertson
03-09-2025	Expand safeguarding risks to include misinformation, disinformation, conspiracy theories, and misuse of generative AI	G.Robertson
03-09-2025	Update terminology	G.Robertson
11-04-2026	Update Safeguard details	G.Robertson



## Key Personnel

Role	Name	Contact Details
Designated Safeguarding Lead (DSL)	Daun Beresford	<a href="mailto:D.Beresford@alternativeacres.co.uk">D.Beresford@alternativeacres.co.uk</a> 07312132356
Deputy DSL(s)	Gemma Robertson	<a href="mailto:g.robertson@alternativeacres.co.uk">g.robertson@alternativeacres.co.uk</a> 07312132515
Head of Education	Gemma Robertson	<a href="mailto:g.robertson@alternativeacres.co.uk">g.robertson@alternativeacres.co.uk</a> 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 Enquiries)	<a href="mailto:CityMash@nottinghamcity.gov.uk">CityMash@nottinghamcity.gov.uk</a> 0115 876 4800
Nottinghamshire County MASH	0115 9774247
Local Authority Designated Officer (LADO)	<a href="mailto:lado@nottinghamcity.gov.uk">lado@nottinghamcity.gov.uk</a>

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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 (2025).

We work in close collaboration with families, safeguarding partners, and external agencies to ensure effective and joined-up support for every learner. In line with the 2025 updates for alternative provision, we recognise the importance of ensuring that children placed with us are safeguarded effectively, that roles and responsibilities are clear, and that robust communication is maintained with placing schools, Virtual School Heads, and local authorities, including for children in kinship care.

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, previously looked-after, or living in kinship care arrangements
- Are regularly absent from education, missing for extended periods, or placed in alternative provision
- 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 (2025) 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.

In line with the latest statutory updates for alternative provision, we work closely with placing schools, local authorities, and Virtual School Heads to ensure clear accountability, effective communication, and joined-up safeguarding for every learner, including those in kinship care.

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 to emerging safeguarding risks such as online harms, misinformation, disinformation, and the misuse of generative AI. 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, including emerging risks such as online harms, misinformation, disinformation, and the misuse of generative AI
- Clear arrangements are in place with commissioning schools, local authorities, and Virtual School Heads to safeguard children placed in alternative provision

### **Legislation and statutory guidance**



This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the Governance Handbook.

We comply with this guidance and 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 Education (Provision of Information about Children in Alternative Provision) (England) Regulations 2007, which set out duties for sharing safeguarding and educational information between schools, local authorities, and providers
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment
- EYFS (2025) updates, which require verified references before employment is confirmed, at least 2 emergency contacts per child, and procedures for following up on unexplained absences

#### **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 abuse
- 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 honour-based violence (HBV)
- Mental health
- Private fostering
- Racist, disability, and homophobic or transgender abuse
- Radicalisation and extremist behaviour



- Misinformation, disinformation, conspiracy theories, and misuse of generative AI (online harms)
- Sexting and sharing of indecent images
- Sexual exploitation
- Teenage relationship abuse
- Upskirting
- Trafficking
- Children and the court system (as witnesses or parties)
- 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 (2025) and defined in the Children Act 2004 (as amended by 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 (ICBs) 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 preventative culture 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 are always unacceptable
  - Online harms, including misinformation, disinformation, conspiracy theories, and misuse of generative AI

### **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. This provision applies regardless of whether the young person is above the legal age of consent or has left provision.

The Act 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
- Causing a child to witness a sexual act

### **All Staff Responsibilities**

All staff will:

- Read and understand part 1 and annex B of Keeping Children Safe in Education (2025), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to confirm they have reviewed the guidance
- Undertake regular safeguarding and online safety training, in line with statutory requirements and local safeguarding partner updates
- Reinforce the importance of online safety when communicating with parents and carers, including explaining what children are being asked 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 policy, the staff code of conduct, the role and identity of the DSL/Deputy DSL, the behaviour policy, eSafety/online safety policy, and the safeguarding response to children 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 intervention
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including their expected role in these processes
- What to do if they identify a safeguarding concern 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 extremism
  - Serious violence, including county lines
  - Online harms, including exposure to harmful content, misinformation, disinformation, conspiracy theories and generative AI misuse
- 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, in the community, 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 may need early help, protection or safeguarding

### **Safeguarding Team Responsibilities**

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

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

Out of hours, Gemma Robertson can be contacted 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
- Maintain up-to-date knowledge of harmful sexual behaviour (HSB) and how to respond
- Oversee, understand and regularly review the filtering and monitoring systems in place at our provision, ensuring they remain effective and proportionate
- Ensure all staff receive appropriate Prevent duty training and safeguarding induction
- Ensure safeguarding training for themselves is refreshed at least every 2 years, with regular updates in between

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, and use this to inform the provision's policies and practices
- Be confident about what local specialist support is available for children involved (including victims and alleged perpetrators) in cases of sexual violence and sexual harassment, and know how to access this support
- Ensure that children have access to an 'appropriate adult' in the case of a police investigation or search
- Oversee the single central record (SCR) and safer recruitment procedures, ensuring compliance with statutory requirements
- Provide regular safeguarding reports and updates to the governing body/management committee to ensure accountability and transparency

## 6. Reporting Concerns

At Alternative Acres, the safety and well-being of our students is paramount. All safeguarding concerns must be reported immediately.

Designated Safeguarding Lead (DSL): Gemma Robertson

Designated Safeguarding Deputy (DSD): To be appointed

The DSL and DSD(s) form the Safeguarding Team, which will be expanded and developed as the provision grows.

- After raising a concern with a member of the Safeguarding Team, staff must complete a detailed CPOMS entry, using appropriate category selections.
- Reports must be timely, factual, dated, and written in the child's own words where possible. Staff should not add personal opinions or assumptions.



- If, at any point, there is an immediate risk of serious harm to a child, an immediate referral must be made to Children’s Social Care or the police.
- Anyone can make a referral, but the DSL must be informed without delay if a referral has been made directly.
- Where concerns relate to online activity (including harmful content, online grooming, AI misuse, or cyberbullying), staff must log these in the same way and ensure the DSL is notified.

## **7. Managing Disclosures**

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

- Make a referral to Children’s Social Care and/or the police immediately.
- Inform the DSL as soon as possible if you have made a referral directly.

### **Disclosures of Abuse**

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

- Listen to and believe them
- Allow them time to talk freely, without interruption, and do not ask leading questions
- Stay calm and avoid showing shock, judgement or distress
- Tell the child they have done the right thing by speaking up – do not blame them or suggest they should have spoken sooner
- Explain clearly what will happen next, and that you will need to share the information with the Safeguarding Team
- Never promise to keep the disclosure secret
- Speak to the DSL/DSD as soon as possible and share what was said
- Write up your conversation as soon as possible, in the child’s own words, sticking to facts and avoiding interpretation
- Log your report on CPOMS promptly, selecting the most appropriate safeguarding category

Staff should be mindful that some children may:

- Not feel ready, or know how, to tell someone they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened, particularly if they have additional vulnerabilities (e.g. SEND, disability, sexual orientation, gender identity, or language barriers)
- Disclose incidents indirectly or online – e.g. through social media posts, messages, or comments while using digital tools

None of these barriers should prevent staff from exercising professional curiosity and reporting concerns to the DSL.



## **Early Help Assessment**

Where early help is appropriate, the DSL will usually take the lead in liaising with other agencies and initiating an inter-agency early help assessment.

Staff may be required to contribute to assessments and support professionals from other agencies. Decisions around thresholds and interventions will be made in line with arrangements agreed with the local safeguarding partners.

The DSL will:

- Keep all cases under regular review
- Monitor the impact and timelines of interventions
- Escalate concerns to Children's Social Care if the child's situation does not improve or deteriorates
- Consider risks in the wider context (family, peers, school, community, and online) as part of contextual safeguarding

## **Referral**

If it is appropriate to refer a case to local authority children's social care or the police, the DSL will make the referral, or support staff to do so.

In Nottingham City, referrals are made via the MARF (Multi-Agency Referral Form), completed online when reporting concerns to Children and Families Direct:

[Nottingham City MARF and MASH Guidance](#)

The local authority will make a decision within 1 working day of a referral and inform the referrer of the outcome.

- If this does not happen, the DSL (or person who made the referral) must chase for a response and ensure that all outcomes are recorded on CPOMS.
- If a child's situation does not appear to be improving, the DSL (or referrer) must follow the local escalation procedures to ensure concerns are addressed and the child is safeguarded.

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

Definition: KCSiE (2025) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". It is illegal in the UK and considered a form of child abuse with long-lasting physical and psychological consequences.



### **Mandatory Duty for Teachers:**

Any teacher who:

- Is informed by a girl under 18 that FGM has been carried out on her; OR
- Observes physical signs that appear to show that FGM has been carried out on a girl under 18, where there is no reason to believe the act was necessary for health reasons or connected with labour/birth, must immediately report this to the police (by dialling 101 or 999 in an emergency).

This is a statutory duty under the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015). Failure to comply may result in disciplinary action. Unless advised otherwise by the police, teachers should also inform the DSL, who will refer to Children's Social Care.

### **For suspected or at-risk cases (not confirmed FGM):**

- Staff must not examine pupils.
- Any concerns must be reported immediately to the DSL, who will escalate appropriately in line with safeguarding procedures.

All other staff (non-teaching) who suspect FGM has been carried out, or that a child is at risk, must report to the DSL immediately.

### **If you have concerns about extremism**

Where concerns arise about a child being radicalised or exposed to extremist ideologies:

- If the child is at immediate risk of harm or danger, call 999.
- Otherwise, staff should speak to the DSL or DSD in the first instance to agree a course of action.
- Staff can make a direct referral to Children's Social Care if appropriate, but must inform the DSL as soon as possible afterwards.

### **The DSL will:**

- Assess the level of risk and determine which agency to contact.
- Where appropriate, make a referral to Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism.
- Consider referral to Children's Social Care where wider safeguarding concerns are present.

### **Helplines and support:**

- DfE dedicated helpline: 020 7340 7264
- Email: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk) (not for emergencies)
- In an emergency, call 999 or the confidential anti-terrorist hotline: 0800 789 321

### **Concerns may include:**

- A child expressing extremist views or being influenced online
- Evidence a child is being approached or groomed by extremist groups



- A child planning to travel to join extremist organisations
- Exposure to extremist or radicalising material, including through online platforms, AI tools, or encrypted apps (newly emphasised in 2025)

### **Allegations of abuse made against other pupils (Child-on-Child Abuse)**

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 create 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 managed under our 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 sharing of nudes and semi-nudes (both consensual and non-consensual)

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

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

- Record the allegation on CPOMS and inform the DSL immediately – do not investigate.
- The DSL will contact Children’s Social Care and follow their advice, and will also contact the police if the allegation involves a potential criminal offence.
- The DSL will complete a risk assessment and support plan for all children involved (victim(s), alleged perpetrator(s), and any others affected), identifying a named staff member each child can talk to.
- The DSL will consider all vulnerable contexts (e.g. transport, social media, farm/outdoor areas) when creating the risk assessment.
- The DSL will liaise with CAMHS or other health services where appropriate.
- If a criminal offence is alleged and police investigations are ongoing, the DSL will maintain close communication with police and other agencies, while considering disciplinary measures as appropriate.

### **Creating a supportive environment and minimising risk**



We will take proactive action to reduce the risk of child-on-child abuse and ensure victims feel able to report:

- Challenging all derogatory, sexualised, or inappropriate behaviour, including online.
- Teaching pupils about respect, consent, and healthy relationships through PSHE/RSE and across the curriculum.
- Making reporting systems simple, accessible, and confidential.
- Reassuring victims that they will be listened to, taken seriously, and supported.
- Monitoring reports of sexual violence/harassment for potential systemic or environmental issues (e.g. hotspots, supervision gaps, online platforms) and updating policies/practices accordingly.
- Supporting children who have witnessed or been affected by incidents of abuse.
- Ensuring siblings or family members are also supported where intra-familial abuse has occurred.
- Training staff so they understand:
  - Indicators and signs of child-on-child abuse.
  - How children may disclose indirectly (e.g. via friends, overheard conversations, behaviour changes).
  - That children with SEND, those with language barriers, or those from minority groups may face additional barriers to disclosure.
  - That those who harm peers may themselves be victims of abuse.
  - The influence of social media, group chats, and online platforms in escalating or continuing incidents.
  - The principle of “*it could happen here*”.

## **Review and escalation**

### **Initial review meeting:**

The DSL will hold a review meeting (with the staff member who reported the incident and safeguarding team) to determine:

- Immediate risks and protective measures.
- Whether referrals are needed to police and/or children’s social care.
- If viewing an image/video is necessary for safeguarding (in most cases it should not be viewed).
- The extent of any online sharing and appropriate actions.
- Which other agencies, schools, or individuals may need to be contacted.
- Whether parents/carers should be informed (in most cases they will be).

### **The DSL will make immediate referrals if:**

- The incident involves an adult.
- Grooming, coercion, or capacity to consent is an issue (e.g. SEN).
- Content is violent or developmentally inappropriate.
- Any pupil in the material is under 13.



- A pupil is at immediate risk of harm (e.g. suicidal or self-harming).

#### **Further review:**

If not referred at the initial stage, the DSL will keep the case under review, conduct pupil interviews where appropriate, and escalate immediately if concerns of harm arise.

#### **Parents/carers**

Parents/carers will usually be informed early and kept involved, unless doing so would place the child at risk.

#### **Record-keeping**

- All safeguarding concerns, discussions, decisions and reasons will be recorded on CPOMS.
- Records will include:
  - A clear, factual summary of the concern.
  - Actions taken and outcomes.
  - Referrals made and responses.
  - Lessons learned.
- Child protection files will be:
  - Kept separately from the main pupil file.
  - Accessible only to the safeguarding team.
  - Transferred securely to new settings within 5 school days of transfer (in-year) or within the first 5 days of term.
  - Accompanied by a DSL-to-DSL handover if concerns are complex or ongoing.

Safeguarding records are stored securely (Google Drive, CPOMS, and locked safeguarding folders with DSL/Deputy-only permissions).

### **8. 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, Alternative Acres will:**

- Have robust processes, including filtering and monitoring systems, to help ensure the online safety of pupils, staff, and volunteers.
- Protect and educate the whole provision community in the safe and responsible use of technology, including mobile and smart devices.
- Set clear expectations for mobile phone use for pupils, staff, and visitors.
- Establish clear mechanisms to identify, intervene in, and escalate incidents or concerns.



## The 4 key categories of online risk

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

- Content – exposure to harmful or inappropriate material (e.g. pornography, racism, self-harm, suicide content, misogyny, extremism, antisemitism).
- Contact – harmful interaction with others (e.g. grooming, coercion, peer pressure, exploitation).
- Conduct – unsafe or harmful personal behaviour (e.g. bullying, sharing explicit images, sexting).
- Commerce – financial risks (e.g. scams, gambling, phishing, in-game purchases).

## Meeting our aims

We will:

- Educate pupils about online safety within our PSHE/RSHE curriculum, covering:
  - Safe use of the internet and social media.
  - Keeping personal information private.
  - Recognising and reporting harmful or unacceptable behaviour online.
  - Cyber-bullying and how to report it (including when witnessed).
- Train staff, during induction and through annual refresher training, on:
  - Online risks (cyber-bullying, grooming, online radicalisation, sexting, harmful content).
  - Safe internet use and their safeguarding responsibilities.
  - Roles in monitoring and filtering provision systems.
- Ensure clear expectations for staff mobile phone use:
  - Personal use limited to non-contact time when pupils are not present.
  - No photos or videos of pupils taken on personal devices.
- Reinforce that staff have powers to search and confiscate pupils' phones (DfE guidance: *Searching, Screening and Confiscation 2022*).
- Review filtering and monitoring systems annually, with governors/management oversight, considering age, needs, and risk assessment.
- Provide safeguarding updates, including online safety, in weekly team meetings and annual training.
- Review policies annually, ensuring online safety procedures remain current and robust.
- Store all student and safeguarding records securely on CPOMS and Google Drive with access controls.

## Artificial Intelligence (AI)



Generative AI tools (e.g. ChatGPT, Google Bard, image/video generators) are increasingly accessible. AI can enhance teaching and safeguarding but may also be misused (e.g. deepfakes, bullying, grooming, exposure to harmful content).

- Any use of AI to facilitate abuse will be treated under this policy and the Behaviour Policy.
- Staff must risk-assess new AI tools before use in teaching.
- Pupils will be educated about the risks and benefits of AI within the curriculum.

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

If you become aware of the consensual or non-consensual sharing of nudes/semi-nudes:

- Report immediately to the DSL and log on CPOMS.
- Reassure the pupil(s) that they will receive support.

#### **You must not:**

- View, copy, share, or store the imagery.
- Ask the pupil to delete it.
- Investigate the incident or ask questions about the imagery.
- Share information about the incident beyond the DSL.
- Blame or shame any pupil involved.

#### **Curriculum coverage:**

Pupils will be taught about the risks, legality, and consequences of sharing nudes/semi-nudes as part of PSHE/RSHE, including:

- Understanding what sexting is and how it happens.
- Legal and safeguarding implications.
- Strategies to resist pressure and manage receipt of unwanted images.
- Impact on mental health, relationships, and reputation.

## **9. Supporting pupils**

At Alternative Acres, we understand the profound impact that abuse, neglect, or exposure to violence can have on a child or young person. Pupils may experience low self-worth, helplessness, shame, or self-blame.

#### **We are committed to:**

- Handling safeguarding cases with sensitivity and care.
- Providing support in line with the Nottingham City Safeguarding Children Partnership (NCSCP) procedures.
- Promoting resilience, self-esteem, and self-assertiveness.
- Challenging aggression, bullying, discrimination, and harmful behaviours.



- Creating a safe, caring, and inclusive environment where every pupil feels valued and supported.

## **10. Supporting vulnerable groups**

Pupils with special educational needs, disabilities (SEND) or health issues  
We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges and are statistically three times more likely to be abused than their peers.

### **Additional barriers may exist in recognising abuse and neglect, including:**

- Assumptions that behaviours, mood changes, or injuries are related to the child's condition, without further exploration.
- Greater vulnerability to peer isolation or bullying (including prejudice-based bullying).
- Disproportionate impact of bullying or harassment, even when they may not outwardly show signs.
- Communication barriers and difficulties in reporting concerns or disclosing abuse.

### **At Alternative Acres we:**

- Provide extra pastoral support, including access to our student support team.
- Offer flexible support in class and quiet spaces outside the classroom, where needed.
- Ensure close liaison with the DSL (or Deputy DSL) for any safeguarding concerns involving pupils with SEND.
- Make reasonable adjustments to ensure these pupils are included, supported, and safeguarded.

### **Pupils with a social worker**

Some pupils may need a social worker due to safeguarding or welfare concerns. We recognise that a child's experiences of adversity and trauma can increase their vulnerability to further harm and may affect attendance, learning, behaviour, and mental health.

The DSL and staff will work closely with social workers to protect and support these pupils. Where a pupil has a social worker, the DSL will always take this into account when making decisions in the pupil's best interests, including:

- Responding to unauthorised absences or episodes of missing education.
- Providing pastoral or academic support tailored to their needs.



- Ensuring effective communication with social workers to share relevant safeguarding information.

## **Looked-after and previously looked-after children**

We are committed to safeguarding the wellbeing and educational outcomes of looked-after and previously looked-after children.

We will ensure that:

- The DSL is also the Designated Teacher for Looked After Children.
- Appropriate staff are informed of each child's legal status, care arrangements, and contact details for parents/carers or those with parental responsibility.
- The Safeguarding Team holds up-to-date details of each child's allocated social worker and Virtual School Head (VSH).
- We work with local authorities, carers, and external agencies to provide consistent pastoral and academic support.

## **11. Working with Parents/Carers**

- Child's voice will guide our response. When appropriate, we *actively involve* the child in discussions with parents/carers, considering their wishes about safeguarding measures.
- Risk-based communication: If notifying parents increases the child's risk, we consult with Local Authority children's services before proceeding.
- Child-on-child abuse: In such cases, we will work with police and social care, notifying parents carefully and protecting identities as needed.

## **12. Staff Training**

All staff will receive safeguarding training at induction and regular updates (at least annually) that include:

- Online safety: Recognising modern risks—misinformation, disinformation, conspiracy theories, and self-generated sexual content.
- Filtering & monitoring: Understanding expectations around effectiveness and proportionality, using the DfE's *Plan technology for your school* and AI safety standards.
- Attendance risks: Recognising absence as a possible safeguarding indicator, following the now-statutory *Working Together to Improve School Attendance 2024* guidance.
- Alternative Provision obligations: Awareness of enhanced expectations when working with AP providers, including staff vetting, half-termly placement reviews, and student safety monitoring.
- Contextual and early help: Acting on signs of vulnerability, exploitation, or mental health struggles earlier, in line with updated safeguarding frameworks.
- New safeguarding resources: Familiarity with *Shore Space* for harmful sexual behaviour, CSA Centre, and Child Sexual Exploitation materials.



- DSL & Deputy DSL training: Continued Level 3+ training (every 2 years) with annual refreshers, including Prevent, online vigilance, and AP oversight obligations.

### 13. Contractors and External Staff

- Written vetting confirmation: When accepting placements from alternative providers, obtain written assurance that all safeguarding checks (DBS, identity, recruitment) have been completed. [Safeguarding Network Showcase Training Ltd.](#)
- Review and oversight: Monitor external staff changes actively and review placement safety at least every half term.
- Continue to manage external staff (contractors, volunteers, trainees) under enhanced DBS and safer recruitment protocols. Ensure alignment with the latest online safety, resource, and supervision standards.

### 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.

At Alternative Acres, we also recognise:

- **Child-on-child abuse** (such as bullying, sexual violence and harassment, upskirting, physical violence, initiation/hazing, and online abuse).
- **Online harms**, including grooming, harmful sexual behaviour, and exposure to misinformation, disinformation, or conspiracy material that may endanger wellbeing.
- **Contextual safeguarding risks**, where harm may occur outside the home, in peer groups, the community, or online spaces.
- **Children missing education**, or irregular attendance, as potential indicators of abuse, neglect, or exploitation.

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

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



<p><b>Signs of Physical Abuse:</b></p> <ul style="list-style-type: none"> <li>• Unexplained burns, bites, bruises, broken bones, or black eyes in the child.</li> <li>• Bruises or marks that become noticeable after a period of absence from provision.</li> <li>• Displaying fear or resistance towards parents or caregivers and showing distress when it's time to go home.</li> <li>• Exhibiting a shrinking or fearful response in the presence of adults.</li> <li>• Reporting injuries caused by a parent or adult caregiver.</li> <li>• Conflicting, unconvincing, or no explanation provided by the parent or caregiver regarding the child's injuries.</li> <li>• Describing the child in extremely negative terms or exhibiting harsh physical discipline.</li> </ul>	<p><b>Signs of Neglect:</b></p> <ul style="list-style-type: none"> <li>• Frequent absences from provision.</li> <li>• Begging or stealing food or money.</li> <li>• Lack of necessary medical or dental care, immunizations, or glasses.</li> <li>• Consistently appearing dirty with severe body odour.</li> <li>• Inadequate clothing for the weather conditions.</li> <li>• Substance abuse or drug involvement.</li> <li>• Stating that there is no one at home to provide care.</li> <li>• Showing indifference, apathy, depression, irrational behaviour, or bizarre mannerisms in the parent or caregiver.</li> </ul>
<p><b>Signs of Sexual Abuse:</b></p> <ul style="list-style-type: none"> <li>• Difficulty walking or sitting.</li> <li>• Refusal to change for physical activities or participate in them.</li> <li>• Nightmares or bedwetting.</li> <li>• Sudden changes in appetite.</li> <li>• Displaying knowledge or engaging in sexual behaviours that are inappropriate for their age.</li> <li>• Pregnancy or contracting sexually transmitted infections, particularly if under the age of 14.</li> <li>• Running away.</li> <li>• Disclosing sexual abuse by a parent or adult caregiver.</li> <li>• Overly protective behaviour or limiting contact with other</li> </ul>	<p><b>Signs of Emotional Abuse:</b></p> <ul style="list-style-type: none"> <li>• Extreme behaviour such as being overly compliant, demanding, passive, or aggressive.</li> <li>• Inappropriately assuming adult or infantile behaviours.</li> <li>• Delayed physical or emotional development.</li> <li>• Suicide attempts.</li> <li>• Expressing a lack of attachment to the parent.</li> <li>• Constantly blaming, belittling, or berating the child in the parent or caregiver.</li> <li>• Showing indifference towards the child and rejecting offers of help for the child's problems.</li> </ul>



<p>children, especially of the opposite sex in the parent or caregiver.</p> <ul style="list-style-type: none"> <li>• Exhibiting secretive and isolated behaviour.</li> <li>• Jealousy or controlling behaviour towards family members.</li> </ul>	
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### **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 the Local Authority Designated Officer (LADO).

### **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:

- 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 attendance are often vulnerable and at increased risk of becoming children missing from education. Absence from education can also be an indicator of abuse, neglect, exploitation, or involvement in criminal activity.

At Alternative Acres, we treat attendance as a safeguarding priority, in line with *Working Together to Improve School Attendance (2024)*. Any child identified as at risk of CME will be referred to the Local Authority in accordance with statutory duties.

## **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. Staff will report concerns immediately to the DSL, who will follow local safeguarding procedures.

## **CHILD ON CHILD ABUSE**

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

All staff must recognise that child-on-child abuse can occur between children of any age and gender, both in person and online. It will never be tolerated or passed off as “banter,” “just having a laugh,” or “part of growing up.”

Examples include (but are not 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 (rape, assault by penetration, sexual assault)
  - Sexual harassment (sexual comments, remarks, jokes, online harassment)
  - Upskirting
  - Sexting (youth-produced sexual imagery)
- Initiation/hazing type violence and rituals

Alternative Acres has a **zero tolerance approach** to child-on-child abuse. Support will always be provided for both the victim and the alleged perpetrator, recognising that both may be vulnerable and require safeguarding interventions.

Our procedures to minimise risk include comprehensive filtering and monitoring systems, a robust behaviour policy, and education to equip students with the skills to recognise and manage unsafe interactions.

### **CHILD SEXUAL EXPLOITATION (CSE)**

Child sexual exploitation involves exploitative situations, contexts, and relationships where young people receive something (e.g. food, accommodation, drugs, alcohol, gifts, money, or affection) as a result of engaging in sexual activities.

CSE is characterised by an imbalance of power in the relationship, which the perpetrator uses to coerce, intimidate, or manipulate the victim.

### **CHILD CRIMINAL EXPLOITATION (CCE)**

Child criminal exploitation occurs when individuals or groups take advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity. This can include:

- County lines (drug running and transportation)
- Forced shoplifting, theft, or begging
- Serious violence, including knife crime
- Financial exploitation

Children may be exploited even if they appear to consent. Signs may include:

- Unexplained money or possessions
- Increased absence from provision
- Association with older individuals or groups
- Decline in academic performance
- Signs of assault or unexplained injuries

Staff must remain alert and report any concerns immediately.

### **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. This is known as contextual safeguarding.



Staff must remain professionally curious and consider whether wider environmental factors (such as peer groups, community, or online influences) may present a threat to a child's safety and welfare.

### **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. Cyberbullying can happen at any time of day, with a potentially large audience, and content can be easily forwarded.

The Education Act 2011 gives staff the power to search for and, if necessary, delete inappropriate images or files on electronic devices, including mobile phones, when they are believed to be linked to bullying.

### **DOMESTIC VIOLENCE, CONTROLLING AND COERCIVE BEHAVIOUR**

Domestic violence and abuse refers to incidents or patterns 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. Children who experience domestic abuse are recognised in law as victims in their own right. Abuse can be psychological, physical, sexual, emotional, or financial.

### **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. Community safety incidents (such as adults loitering near schools or engaging children in conversation) also raise safeguarding concerns. Children will be provided with practical advice to keep themselves safe as they gain independence.

### **DRUGS**

As part of our duty to promote wellbeing, Alternative Acres has a clear role in preventing drug misuse through education and pastoral support. "Drugs" includes medicines, volatile substances, alcohol, tobacco, illegal drugs, and psychoactive substances.

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

Fabricated or induced illness is a rare but dangerous form of abuse where a carer deliberately causes or exaggerates a child's illness.

### **FAITH ABUSE**

Harmful beliefs (e.g. witchcraft, spirit possession, ritual killings, or the use of magic to instil fear) may lead to abuse. Staff must remain alert to cultural practices being used to justify abuse.

### **FEMALE GENITAL MUTILATION (FGM)**



FGM is a criminal offence in the UK. Staff must be alert to signs a girl may be at risk and follow safeguarding procedures immediately.

### **FORCED MARRIAGE**

A forced marriage is one where one or both individuals do not consent and where pressure, abuse, or coercion is used. It is a recognised form of abuse and a crime in the UK.

### **GANGS AND YOUTH VIOLENCE**

Involvement in gangs or serious youth violence places children at significant risk. Signs include changes in friendships, absence from education, unexplained gifts, or injuries. Staff should act on concerns immediately.

### **'HONOUR BASED' VIOLENCE (HBV)**

Includes FGM, forced marriage, breast ironing, and other practices carried out to protect perceived "honour." HBV is abuse and will be treated as such.

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

VAWG includes physical, sexual, and economic abuse or exploitation that disproportionately affects women and girls.

### **MENTAL HEALTH**

At least one in four people experience a mental health problem at some point in their life. Many children experience their first difficulties before age 14.

A pupil's behaviour may be related to an unmet mental health need. Mental health issues may also be an indicator of abuse, neglect, or exploitation.

Staff at Alternative Acres are well placed to observe children day-to-day and identify concerns early. Concerns will be recorded on CPOMS, and the DSL/DSDs will make referrals to appropriate professionals.

### **CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND)**

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 may include:

- Assumptions that indicators of possible abuse (such as behaviour, mood, or injury) are related to the child's condition without further exploration.
- Being more prone to peer group isolation or bullying (including prejudice-based bullying).
- Being disproportionately impacted by behaviours such as bullying without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting challenges.



- Limited cognitive understanding – for example, struggling to distinguish between fact and fiction in online content, repeating content/behaviours in provision, or not understanding the consequences of their actions.

Staff at Alternative Acres must be particularly vigilant, ensuring that safeguarding concerns for children with SEND are not overlooked and that barriers to reporting are actively reduced.

### **PUPIL WELL-BEING**

Pupils need support throughout their time at provision. At times this support need will be greater, and at other times lesser. Staff must remain alert to signs of stress, poor mental health, self-harm, or any other concerns relating to a pupil's wellbeing. All concerns must be reported following Alternative Acres' child protection procedures.

### **PRIVATE FOSTERING**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (or 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 include extended family members, friends of the family, or individuals not previously known to the child's family. A person defined as a relative under the Children Act 1989 (e.g. grandparent, sibling, uncle, aunt, step-parent) will not be classed as a private foster carer.

All private fostering arrangements must be reported to the local authority. Staff at Alternative Acres have a mandatory duty to notify the Safeguarding Team immediately if they become aware of or suspect such an arrangement. The DSL will ensure the family understands their duty to inform the LA and will confirm who holds parental responsibility.

### **RADICALISATION**

Under the Prevent duty (part of the CONTEST strategy), provisions are required to safeguard children and young people from being drawn into terrorism.

This includes:

- Challenging extremist ideology.
- Supporting vulnerable individuals.
- Providing early intervention to reduce risk.

Staff must remain alert to changes in behaviour or attitudes that may indicate radicalisation and follow safeguarding procedures promptly.

### **SEXTING (YOUTH-PRODUCED SEXUAL IMAGERY)**

Sexting is when someone sends or receives a sexually explicit text, image, or video on their mobile device, often via messaging. This can lead to sextortion, a form of sexual exploitation that uses threats or coercion to extort sexual favours or money.



All cases of sexting will be dealt with as safeguarding concerns, following national guidance and Alternative Acres' e-Safety Policy.

### **TEENAGE RELATIONSHIP ABUSE**

Teenage relationship abuse involves controlling, coercive, threatening, or violent behaviour within intimate relationships, regardless of gender or sexuality. While the Domestic Abuse Act 2021 applies to individuals aged 16+, abuse can occur in younger teenagers, often digitally but also physically or emotionally.

Examples include:

- **Controlling behaviour:** acts designed to isolate, exploit, or regulate a person's everyday behaviour.
- **Coercive behaviour:** assault, threats, humiliation, intimidation, or other abuse used to harm or frighten a victim.

Where teenage relationship abuse is suspected, it will be managed as a safeguarding concern.

### **SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN**

Sexual violence and harassment can occur between children of any age or sex, both in person and online, and may involve groups or individuals.

Staff must recognise that:

- Sexual violence and harassment are never acceptable and must never be tolerated.
- Victims must always be taken seriously and offered appropriate support.
- Some groups, such as girls, children with SEND, and LGBTQ+ children, are at greater risk.
- Dismissing such behaviours as "banter," "part of growing up," or "boys being boys" is unacceptable and risks normalising harmful behaviour.

Examples of concerning behaviour include unwanted sexual comments, grabbing, flicking bras, lifting skirts, or online harassment.

### **UPSKIRTING**

'Upskirting' involves taking a photo under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks. It is a specific criminal offence under the Voyeurism (Offences) Act 2019 and will always be treated as a safeguarding concern.

### **TRAFFICKING**

Children may be trafficked for a range of exploitative purposes, including:

- Sexual exploitation
- Domestic servitude
- Forced labour
- Benefit fraud
- Criminal activity (e.g. pick-pocketing, theft, drug running)



Some trafficked children arrive in the UK with little evidence of relationship to accompanying adults, inadequate accommodation, or no parental consent. Staff must remain alert to signs of trafficking and report any concerns immediately to the DSL, who will refer to children's services.

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

Children may sometimes be required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

Age-appropriate guides are available to support children (5–11 years and 12–17 years). These explain the process in straightforward language and help prepare children for what to expect.

Making child arrangements via the family courts following separation can be stressful and may entrench conflict in families, which can in turn impact children's wellbeing. The Ministry of Justice has launched an online child arrangements information tool with clear and concise guidance on dispute resolution services, which may be helpful for some parents and carers.

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

Approximately 200,000 children in the UK have a parent sent to prison each year. These children are at increased risk of poor outcomes, including poverty, stigma, isolation, and poor mental health.

Staff should be aware of this increased vulnerability and support children appropriately. The National Information Centre on Children of Offenders (NICCO) provides resources for professionals to help mitigate negative consequences and offer tailored support.

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

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 or young person under 18.

- Victims may be criminally exploited even if the activity appears consensual.
- CCE does not always involve physical contact and may occur through the use of technology.
- County lines exploitation involves children being forced to move drugs, money, or weapons across areas, often staying in unsafe accommodation such as "trap houses".
- Criminal exploitation can also include children forced to work on cannabis farms, commit theft, or engage in fraud.

Staff must remain vigilant to signs of exploitation and report concerns immediately to the DSL.

### **HOMELESSNESS**

Being homeless, or at risk of homelessness, presents a serious risk to a child's welfare.



The DSL/DSDs must be aware of local referral routes into the Local Housing Authority and raise concerns at the earliest opportunity.

Indicators of risk may include:

- Poor clothing or hygiene
- Household debt and rent arrears
- Domestic abuse
- Anti-social behaviour
- Families being asked to leave a property

Referral to the Local Housing Authority does not replace a referral to children's social care where there is actual or suspected risk of harm. Both may need to be made.

## **APPENDIX 2 – SAFER RECRUITMENT**

To ensure we recruit suitable staff, all those involved in recruitment and employment at Alternative Acres will have completed appropriate Safer Recruitment training. Safer Recruitment checks on candidates will be overseen by our designated recruiter. Our recruitment and selection process reflects our commitment to safeguarding and promoting the welfare of children.

### **ADVERTISING**

All adverts for roles will make clear:

- Our commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, including the extent of contact with children.
- Whether the role is exempt from the Rehabilitation of Offenders Act 1974. If exempt, applicants must declare relevant spent convictions and cautions that are not “protected”.

### **APPLICATION FORMS**

Application forms will:

- Include a statement that it is an offence to apply if barred from engaging in regulated activity with children.
- Provide a copy of, or link to, our safeguarding policy and policy on the employment of ex-offenders.

### **SHORTLISTING**

Shortlisting will always involve at least two people and will:

- Consider inconsistencies or gaps in employment history.
- Explore potential concerns.

Shortlisted candidates will be asked to:

- Complete a self-declaration of their criminal record and suitability to work with children.



- Confirm whether they are included on the barred list, prohibited from teaching, or subject to restrictions.
- Provide overseas criminal checks where relevant.
- Sign a declaration confirming the information is true.

We may also carry out online and social media checks for shortlisted candidates as part of due diligence.

## **REFERENCES**

We will obtain references before interview and explore any issues with referees or the candidate.

When seeking references we will:

- Not accept open references.
- Verify information with referees directly.
- Ensure references are from the candidate's current employer (and, where possible, signed off by the headteacher/principal if education-based).
- Seek references from the most recent employer if not currently working with children.
- Resolve inconsistencies before making any appointment.

## **INTERVIEW AND SELECTION**

At interview, we will:

- Explore gaps in employment or frequent changes in jobs/locations.
- Probe any potential concerns about suitability.
- Record all decisions made.

## **PRE-APPOINTMENT VETTING CHECKS**

All checks will be recorded on the Single Central Record (SCR). Copies of documents will be stored only in line with statutory guidance.

For all new staff we will:

- Verify identity.
- Obtain an enhanced DBS certificate with barred list check (if engaging in regulated activity).
- Verify mental and physical fitness to carry out the role.
- Verify right to work in the UK.
- Verify professional qualifications.
- Check prohibition orders (for teachers).
- Carry out overseas checks where applicable.
- Ensure Section 128 checks are completed for those in management positions.

## **REGULATED ACTIVITY**

This includes:

- Regular responsibility for teaching, training, instructing, caring for, or supervising children.



- Regular paid or unsupervised work with opportunities for contact with children.
- Any intimate or personal care or overnight activity, even if only once.

### **EXISTING STAFF**

Additional checks will be carried out if:

- Concerns arise about suitability to work with children.
- An individual moves into regulated activity.
- There is a break in service of 12 weeks or more.

We will refer to the DBS if a staff member has harmed or poses a risk of harm to a child and meets the “harm test.”

### **AGENCY AND THIRD-PARTY STAFF**

We will obtain written confirmation from agencies that appropriate vetting checks have been carried out, and will verify the identity of all agency workers.

All agency staff will be included on the SCR from their first day of work.

## **Appendix 3 – Special Safeguarding Issues**

### **Children who are Missing from Education (CME) or Repeatedly Absent**

A child being absent from education, particularly on a repeated basis, can be an indicator of a range of safeguarding concerns. This may include abuse or neglect (including sexual abuse or exploitation, or child criminal exploitation), mental health issues, substance misuse, radicalisation, female genital mutilation (FGM), or forced marriage.

Certain groups of children are particularly at risk, including those who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller communities
- Have parents in the armed forces
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend school
- Come from new migrant families

Alternative Acres will follow procedures for unauthorised absence and CME to identify safeguarding risks, prevent children from going missing, and inform the local authority if a child leaves without a named destination school. Staff will be trained to recognise triggers and warning signs, including travel to conflict zones or risks related to FGM and forced marriage.

Where harm or neglect is suspected, staff will follow local child protection procedures, including making referrals to children’s social care and the police if the child is at immediate risk.

### **Child Criminal Exploitation (CCE)**



CCE is a form of abuse where an individual or group exploits a child or young person under 18 through coercion, control, manipulation, or deception, for financial or other gain, or via threats or violence.

- Perpetrators may be male or female, children or adults.
- Exploitation can be opportunistic or organised and may be one-off or repeated over time.
- Children can be exploited even when activity appears consensual, and exploitation may occur online.

Examples include being forced to work in cannabis factories, move drugs or money (county lines), shoplift, or threaten others.

Indicators of CCE include:

- Possession of unexplained gifts or money
- Associating with older or involved peers
- Emotional or behavioural changes
- Drug or alcohol misuse
- Missing or not engaging with education

Suspected cases must be reported to the DSL, who will trigger local safeguarding procedures, including referrals to social care and police if appropriate.

### **Child Sexual Exploitation (CSE)**

CSE is a form of sexual abuse where a child is coerced, manipulated, or deceived into sexual activity, often in exchange for something they need or want, or for financial or status gain of the perpetrator.

- Perpetrators may be male or female, children or adults.
- Abuse can be one-off or ongoing, opportunistic or organised.
- Exploitation can occur even when the child appears to consent and may take place online or in person.

CSE can include:

- Physical sexual activity (penetrative or non-penetrative)
- Non-contact sexual activity, including online activity, sexual conversations, or sharing explicit images

Indicators may include:

- Older partners
- Signs of sexually transmitted infections or pregnancy

Suspected cases must be reported to the DSL, who will follow local safeguarding procedures.

### **Child-on-Child Abuse**

Child-on-child abuse occurs when children harm other children, inside or outside of school, face-to-face or online. Alternative Acres maintains a zero-tolerance approach to sexual violence and harassment.

Forms include:

- Bullying (including cyber, prejudice-based, and discriminatory)



- Teenage relationship abuse
- Physical abuse (hitting, kicking, biting, hair-pulling)
- Sexual violence (rape, assault by penetration, sexual assault)
- Sexual harassment (comments, jokes, online harassment)
- Coercing someone into sexual activity
- Sharing of nude/semi-nude images (sexting)
- Upskirting
- Initiation/hazing rituals

Harmful sexual behaviour will be considered in context of the child's age and development. Children displaying such behaviour may have experienced abuse themselves and require support.

### **Domestic Abuse**

Children may witness or be affected by domestic abuse, which can include:

- Intimate partner violence
- Abuse by family members
- Teenage relationship abuse
- Child/adolescent to parent abuse

Abuse may be physical, sexual, emotional, financial, or psychological. Children who witness domestic abuse are considered to have been affected by it.

### **Homelessness**

Children at risk of homelessness are vulnerable. The Safeguarding Team maintains contact details and referral routes to the local housing authority and will act in accordance with local procedures.

### **Honour-Based Abuse (HBA) – Including FGM and Forced Marriage**

HBA encompasses crimes committed to protect or defend family or community honour, including FGM, forced marriage, and breast ironing. Abuse may involve wider family or community pressure and multiple perpetrators. All forms of HBA are abuse and will be escalated accordingly. Staff must remain alert to risks and report concerns to the DSL.

### **Female Genital Mutilation (FGM)**

Staff will receive training to identify children affected by or at risk of FGM.

#### **Indicators that FGM has occurred include:**

- Child or family disclosure
- Known history with social services
- Difficulty walking, sitting, or standing
- Spending excessive time in the bathroom
- Urinary, menstrual, or stomach problems
- Avoidance of physical activity or PE
- Repeated or prolonged absence
- Emotional or behavioural changes

**Risk factors include:**

- Family history of FGM
- Community or country of origin practices
- Plans for extended travel abroad
- Limited integration into UK society
- Confiding plans about a “special procedure”

Staff must report all concerns to the DSL immediately.

**Forced Marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats, or other forms of coercion are used to cause a person to enter into marriage. Threats can be physical, emotional, or 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 on forced marriage and its presenting signs. Staff are aware of the “one chance” rule: there may only be one opportunity to speak to a potential victim and intervene.

If a member of staff suspects a pupil is at risk of forced marriage, they will:

- Speak to the pupil in a secure and private place
- Report the concern to the Designated Safeguarding Lead (DSL)

The DSL will:

- Speak to the pupil in a secure and private place
- Activate local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to appropriate therapeutic services

**Radicalisation, Extremism, and Terrorism**

Radicalisation is 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, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

Terrorism is defined as action that:

- Endangers or causes serious violence to a person or people
- Causes serious damage to property
- Seriously interferes with or disrupts an electronic system

The action must be intended to influence the government or intimidate the public and advance a political, religious, or ideological cause.

The Counter-Terrorism and Security Act 2015 places a duty on education providers to prevent children from being drawn into terrorism. The DSL is the Prevent lead and will



undertake in-depth Prevent training, ensuring that staff have access to training to identify children at risk.

Alternative Acres will:

- Assess the risk of pupils being drawn into terrorism, based on local intelligence and collaboration with safeguarding partners and local police
- Maintain internet filtering and monitoring systems and regularly check them
- Equip pupils to stay safe online at school and at home

**Indicators of radicalisation** (Educate Against Hate; NSPCC) may include:

- Refusal to engage with peers who are different
- Susceptibility to conspiracy theories and feelings of persecution
- Changes in friendship groups or appearance
- Rejecting activities previously enjoyed
- Conversion to a new religion
- Isolating from family and friends
- Speaking in a scripted manner or unwillingness to discuss views
- Disrespectful attitudes, anger, or secretive behaviour
- Sympathy for extremist ideologies or contact with extremist recruiters

Staff will act if they have concerns, noting that signs of radicalisation can overlap with normal adolescent behaviour.

### **Sexual Violence and Harassment Between Children**

Sexual violence and harassment can occur:

- Between children of any age or sex
- In groups sexually assaulting or harassing a single child or multiple children
- Online and face-to-face

Victims may find the experience stressful and distressing, which can affect educational attainment. Staff must reassure victims that they are taken seriously and supported, without making them feel ashamed.

**Staff will:**

- Reassure victims that the law protects them, not criminalises them
- Review actions and policies regularly, considering lessons learned
- Identify patterns of concerning behaviour and respond accordingly
- Consider wider cultural issues that may have enabled abuse
- Remain alert to subtle signs of sexual violence

Certain groups are at greater risk: girls, children with SEND, and LGBTQ+ children.

Staff must:

- Challenge inappropriate behaviour
- Make clear that sexual violence and harassment is unacceptable
- Challenge physical behaviours such as grabbing, flicking bras, lifting skirts, or other potentially criminal acts

### **Serious Violence**



Indicators that a child may be at risk from serious violent crime include:

- Increased absence from school
- Changes in friendships, especially with older individuals or groups
- Significant decline in academic performance
- Signs of self-harm or change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or possessions

**Risk factors** include:

- Being male
- Frequent absences or permanent exclusion
- Previous offending
- Involvement in child criminal exploitation
- Experience of abuse or neglect

Staff must report concerns to the DSL.

### **Checking the Identity and Suitability of Visitors**

Visitors unknown to the setting must:

- Verify their credentials and reason for visiting
- Provide identification and sign the visitor book
- Wear a visitor badge

Professional visitors (e.g., educational psychologists) will:

- Show photo ID and either
  - Their DBS certificate, or
  - Written confirmation from their organisation that a DBS check has been completed

All other visitors will be accompanied at all times. Alternative Acres will not invite speakers known to disseminate extremist views and will carry out checks before allowing access.