



Safeguarding Policy and Prevent 2024-25

The purpose of this policy is to ensure that every pupil placed with Access Education NW is safe, happy and successful and protected from harm. We currently have 3 staff and work with provision throughout Lancashire.

Contacts

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1.0 Policy and Context

At Access Education NW, all staff have a shared responsibility for Safeguarding. Any concerns are reported directly to a Designated Safeguarding Lead (DSL) and these are then addressed as needed. We work closely with external agencies as needed to provide the best support.

Access Education NW fully recognises the contribution we can make to protect young people from harm and to support and promote the welfare of all young people who are enrolled with us. This policy applies to all stakeholders; this includes pupils, staff, parents, volunteers, placement students and visitors.

This policy will give clear direction to all stakeholders about expectations and our legal and moral responsibility to safeguard and promote the welfare of all young people enrolled with us.

Access Education NW is committed to safeguarding and promoting the physical, mental and emotional welfare of every young person. We implement a whole-organisation preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. We recognise that **no single professional can have a full picture** of a young person's needs and circumstances. If young people and families are to receive the right help at the right time, **everyone** who encounters them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that all staff members and stakeholders understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of young person abuse, and know to refer concerns to the DSL. In addition, to ensure that staff are aware that ANYONE can make a referral and understand professional challenge.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to young people.
- Endeavour to provide a safe and welcoming environment where young people are respected and valued; where the voice of the young person is listened to and is paramount.

- Where it is believed that a young person is at risk of or is suffering significant harm, AENW will follow the procedures set out by our local Safeguarding Young people Partnership arrangements.

https://panlancashirescb.proceduresonline.com/chapters/contents.html#ind_cases

2.0 Definitions

The terms “**young people**” and “**young person**” refer to anyone under the age of 18.

The purpose of this safeguarding policy is to ensure every pupil at Access Education NW is safe and protected from harm. The Department for Education (DfE) ‘Keeping Young people Safe in Education’ (September 2024), states safeguarding and promoting the welfare of young people is defined for the purposes of this guidance as:

Providing help and support to meet the needs of children as soon as problems emerge

- Protecting young people from maltreatment; whether that is within or outside the home, including online
- Preventing impairment of young people’s mental and physical health or development;
- Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young person to have the best outcomes.

3.0 Indicators and types of abuse

A young person can abuse another young person. This is generally referred to as **young person-on-young person abuse** (now called child on child abuse which replaced the young person on young person) and can take many forms. This can include (but is not limited to) bullying (including cyberbullying, prejudice-based and discriminatory bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; up skirting; initiating/hazing type violence and rituals; abuse in intimate personal relationships between young person; consensual or non-consensual sharing of nudes or semi-nude images or videos, or causing someone to engage in sexual activity without consent. It is essential that staff understand that even if there are no reports in their school as it does not mean that it is not happening, it maybe it is not being reported. For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of the provision. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.

- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

Upskirting refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos, colloquially known as "**sexting**" and "**youth produced imagery**", is defined as the sharing between pupils of sexually explicit content, including indecent imagery. **Indecent imagery** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A young person touching themselves in a sexual way
- Any sexual activity involving a young person
- Someone hurting a young person sexually
- Sexual activity that involves animals

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. A young person under the age of 13 can never consent to any sexual activity. The age of consent is 16.

(CCE CSE para 34)

4.0 Law and Guidance

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to:

Education Act 2002: Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of young person. Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of

independent schools (including academies) to have arrangements to safeguard and promote the welfare of young person.

[Working Together to Safeguard Children 2018](#) guides education establishments of their role within inter-agency working to safeguard and promote the welfare of young person. This is **the government's statutory guidance for all organisations and agencies** who work with, or carry out work related to, young person in the United Kingdom.

[Keeping Children Safe in Education, September 2024](#): Department for Education (DfE) has updated the statutory safeguarding and young person protection guidance for schools and colleges in England, Keeping Children Safe in Education. This guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of young person and young people under the age of 18.

[Guidance for Safer Working Practice 2022](#)

The Children Act 1989 & 2004

The Prevent Duty – The Prevent duty is **the duty in the Counter-Terrorism and Security Act 2023** that sets out guidance for the LA and its partners to have due regard to the need to prevent people from being drawn into terrorism.

Female Genital Mutilation Act 2003 as inserted by the Serious Crime Act <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm/>

[Sexual Offences Act 2003](#)

[Equality Act 2010](#)

Counter-Terrorism and Security Act 2015

[Domestic Abuse Act 2021](#)

[PACE Code C 2019](#)

[Data Protection Act 2018](#)

[Marriage and Civil Partnership Act 2022](#)

[After-school clubs, community activities, and tuition - safeguarding guidance for providers \(publishing.service.gov.uk\)](#)

Relevant Non-statutory guidance

DfE (2015) ['What to do if you're worried a young person is being abused'](#)

DfE (2018) ['Information sharing'](#)

DfE (2020) ['Governance handbook'](#)

DfE (2017) ['Young person sexual exploitation'](#)

DfE (2022) ['Recruit teachers from overseas'](#)

UKCIS (2020) ['Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#)

DfE (2022) ['Working together to improve school attendance'](#)

DfE (2023) ['Meeting digital and technology standards in schools and colleges'](#)

DfE (2022) ['Searching, Screening and Confiscation'](#)

This policy operates in conjunction with the following AENW policies:

- AENW Attendance Policy
- Behaviour Policy
- Online Safety Policy
- Data Protection Policy
- Whistleblowing Policy
- Staff Guidance
- Managing pupils with medical conditions Policy
- Complaints Policy

5.0 Roles and responsibilities

All staff have a responsibility to:

Consider, always, what is in the best interests of the pupil with a **young person-centred approach**

Contribute to, and maintain a **high safeguarding ethos** within the setting, with safeguarding pupils at the forefront of practice, always

Ensure ALL young people have opportunities to communicate and know that they are **listened to and understood**

Contribute to **providing a curriculum** which will equip all young person with the skills to keep themselves safe and develop an attitude which will enable them to enter adulthood successfully and reach their full potential

Establish effective, supportive, and **positive relationships** with parents, carers, pupils and other professionals

Maintain an attitude of '**it could happen here**' where safeguarding is concerned

Be proactive to provide a **safe and secure environment** in which pupils can learn

Be prepared to **identify** pupils or families who may benefit from **early help; and be particularly alert to the potential need for early help for a child who is disabled, has special educational needs (whether they have an EHCP or not); has a mental health need, is a young carer (see para 18 Early Help in KCSIE 2024]**

Be aware of the **school's individual procedures** that support safeguarding, including all policies, internal reporting procedures, information and engage with training provided

Be aware of the role and **identity of the DSL** and deputy DSLs and seek them for advice if required

Undertake **safeguarding training**, including online safety training, during induction and subsequently on a regular basis (at least annually), (which, amongst other things, includes an understanding of the expectations and responsibilities **relating to filtering and monitoring**) including receiving bulletins, emails and briefings. Staff should undertake **Prevent awareness training** at least every two years

Be aware of the **local early help process** and understand their role in it.

Be aware of, and understand, the process for making referrals to young person's Social Care (CSC), understanding that **anyone can make a referral**

Understand how to make a referral to CSC and/or the police immediately, if at any point there is **a risk of immediate serious harm to a young person**

Be aware of and **understand the procedure to follow** if a young person confides they are being abused, exploited or neglected, in a timely manner

Maintain appropriate **levels of confidentiality** when dealing with individual cases

Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.

Be aware of **safeguarding issues** that can put pupils at risk of harm.

Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, sharing indecent images, extremist behaviours and other signs that pupils may be at risk of harm

Be fully aware of the importance of **mental health in relation to safeguarding** and that all staff should also be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Be aware that **a pupil may not feel ready** or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff need to have professional curiosity and speak to the DSL if they have concerns for a child.

Understand the process for reporting **concerns over professional adults**.

Tutors, including the directors, have a responsibility to:

Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the '**Teachers' Standards**'

Report, by law, any disclosures of FGM to the police.

The directors have a duty to:

Take **strategic leadership responsibility** for the AENW safeguarding arrangements

Ensure that AENW **complies with its duties** under the above young person protection and safeguarding legislation

Ensure that all governors receive **appropriate safeguarding and young person protection training** upon their induction and that this training is updated regularly

Ensure that staff **read, understand and follow** part one and Annex B of KCSIE September 2024

Attend **Prevent training** at least every two years

Ensure that a director adopts the role **of DSL** with one or more deputy DSLs to provide support and ensure that they are trained to the same standard as the DSL ensuring that the roles are explicit in their job description(s). Ensure the provision of appropriate support, funding, training, resources, and time to carry out their role

Support and monitor a whole provision **approach to safeguarding**; this includes ensuring that safeguarding and young person protection are at the forefront and **ethos** remains consistently high

Ensure **systems are in place so that young person to confidently report abuse**, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the **voice of the young person** is heard and acted upon.

Ensure **effective and appropriate policies** and procedures are in place

Make sure that **pupils are taught about safeguarding**, that safeguarding is embedded with the curriculum, including protection against dangers online (including when they are online at home), through teaching and learning opportunities

Adhere to statutory responsibilities by conducting **pre-employment checks on staff** who work with young person

Ensure AENW has **clear systems and processes in place for identifying possible mental health problems in pupils**, including clear routes to escalate concerns and clear referral and accountability systems

Ensure that at least one person on any recruitment panel has undertaken **safer recruitment training** (Alison Mashiter- Coates and Caroline Bracewell)

Ensure that **all staff receive relevant safeguarding and young person protection training** updates, including online safety and expectations and responsibilities relating to filtering and monitoring systems e.g., emails, as required, but at least annually, including a thorough induction

Confirm that there are transparent procedures in place to handle **allegations against staff**, supply staff, volunteers and contractors.

Confirm that there are **procedures in place to make a referral to the DBS** and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned

Ensure that appropriate disciplinary procedures are in place, as well as **policies pertaining to the behaviour of pupils and staff**

Ensure that **procedures are in place to eliminate unlawful discrimination**, harassment and victimisation, including those in relation to young person-on-young person abuse.

Create a culture where **staff are confident to challenge** senior leaders over any safeguarding concerns

Understand that online safeguarding is an interrelated and running theme through safeguarding practice. Ensure that **young people are safe online** by ensuring that **appropriate monitoring systems are in place** and regularly review their effectiveness, understanding those young people that are potentially at greater risk of harm, along with the proportionality of costs versus safeguarding risks (see online safety policy)

Put in place appropriate safeguarding responses for pupils who become absent from their EOTAS provision, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation and prevent the risk of escalation in the future

Ensure all staff are aware of, and policies are personalised to reflect, an understanding of specific issues such as **young person-on-young person abuse** (now child on child abuse) and safeguarding young people with disabilities and special educational needs.

Be aware of their obligations under the **Human Rights Act 1998**, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

Ensure that all practice and procedures operate with the best interests of the young person at the centre with a **firm young person-centred approach**.

The DSL has a duty to:

The designated safeguarding lead should take lead responsibility for safeguarding and young person protection (including online safety and understanding the filtering and monitoring systems and processes in place, ensuring their effectiveness) whilst creating a culture of safeguarding throughout the setting, continually raising the profile

Provide **advice, support and expertise to other staff** on young person welfare, safeguarding and young person protection matters.

Take part in strategy discussions, inter-agency meetings and young person Protection Conferences and/or support other staff to do so.

Contribute to the assessment of a young person, and/or support other staff to do so

Ensure that all staff receive appropriate safeguarding training at induction, including online safety and expectations and responsibilities relating to filtering and monitoring. This updated regularly, at least annually

Be available during opening hours for staff to discuss any safeguarding concerns

Arrange, alongside AENW, adequate and **appropriate cover** for any activities outside of standard opening hours or terms.

Refer cases:

To CSC where abuse and neglect are suspected, and support staff who make referrals to CSC

To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme

To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a young person.

To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance

Act as a **point of contact** with the multi-agency partners

Ensure **effective communication** and information sharing (when appropriate).

Liaise with staff when deciding whether to make a referral by **liaising with relevant agencies** so that young person's needs are considered holistically

Promote **supportive engagement with parents** in safeguarding and promoting the welfare of young person, including where families may be facing challenging circumstances

Work with relevant staff, **taking lead responsibility for promoting educational outcomes** for young people, by understanding the lasting impact that adversity and trauma can have on young people's behaviour, mental health and wellbeing, knowing the safeguarding and young person protection issues that young person in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement. This includes:

Ensuring that AENW knows which pupils have or had a social worker

Understanding the academic progress and attainment of these pupils

Maintaining a culture of high aspirations for these pupils

Supporting tutors to provide additional academic support or reasonable adjustments to help these pupils reach their potential

Ensure that **young person protection files are kept updated** and secure, monitoring the quality and accuracy of logs

Ensure that a pupil's young person protection **file is transferred** as soon as possible, and within five days, when transferring to a new school or provider, and consider any additional information that should be shared to support a young person's journey

Ensure **all stakeholders understand the young person Protection Policy**, Keeping Children Safe in Education 2023 statutory guidance and internal procedures to report any concerns are

transparent and understood by all. Ensure this information is given in **induction** and at regular intervals/ training

Ensure AENW Safeguarding **Policy is reviewed annually**, and the procedures are updated and reviewed regularly

Undergo **DSL initial training**, and update this training with refresher training at least every two years to remain compliant

Ensure opportunities for **further training** and opportunities for upskilling are taken

Have due regard to the **PACE Code C** in regards to the role of an appropriate adult
<https://assets.publishing.service.gov.uk/media/6580543083ba38000de1b792/PACE+Code+C+2023.pdf>

Encourage a culture of listening to young people promoting **the voice of the young person**

Recognise the importance of information sharing, including within AENW, with other educational providers and with the safeguarding partners and other agencies by understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR

Undertake **Prevent** awareness training (at least) every two years

Be provided with appropriate support and **supervision** in order to carry out the role safely and effectively

Liaise with the Local Authority Personal Advisors for any Care Leavers.

Have due regard to Appendix C of Keeping Young Children Safe in Education 2024– 'The Role of the Designated Safeguarding Lead' https://www.keepingyoungpersonsafeineducation.co.uk/annex_c.html#:~:text=The%20designated%20safeguarding%20lead%20is%20responsible%20for%20ensuring%20that%20young%20person,protection%20file%20for%20each%20young%20person.

Access Education NW recognises that Deputy DSL's must be trained to same standard as the DSL.

Tutors have a responsibility for promoting the educational achievement of CLA and previously CLA (PLAC), and for young person who has left care through adoption, special guardianship or young person arrangement orders or who were adopted from state care outside England and Wales. In our organisation, this is our DSL, Alison Mashiter-Coates.

Training and Induction

Access Education NW recognise the importance of ongoing staff training and development to keep staff aware of emerging issues and keeping the ethos of safeguarding high. Everybody has a role to play in safeguarding our young people and we strive to ensure all staff are well informed and know what to do if they have any concerns. All staff members and volunteers will undergo safeguarding and young person protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Safeguarding Policy and appropriate safeguarding and prevent training including the reporting form
- The Tutor Guidelines
- Part one and Annex B of 'Keeping Children safe in education' (KCSIE 2024)
- The Behaviour Policy
- The AENW Attendance Policy, including the safeguarding response to a young person who has unexplained absences or go missing from EOTAS
- Information about the role and identity of the DSL and deputy DSL(s)
- How to record concerns in your setting.
- *Records will be kept of all inductions*

Following induction, Access Education NW recognises the need to ensure continual, effective training to staff and other stakeholders. We will ensure: -

- ALL staff and volunteers will receive Safeguarding Training (at least) annually
- The DSL/s will provide ALL staff and volunteers with regular safeguarding updates
- ALL staff and volunteers will read and show an understanding of any updates that are provided
- DSLs will attend DSL training every 2 years and update their knowledge, skills and understanding of relevant safeguarding issues on a regular basis
- All staff will undertake Prevent awareness training (at least) every two years
- That at least one person on any recruitment panel has undertaken safer recruitment training

ALL staff and volunteers will undertake any additional specialised training on matters such as Child Sexual Exploitation, Prevent, Young person-on-young person (now child on child abuse) abuse, Online Safety, FGM etc as is deemed necessary by the DSL and that is particularly relevant to the context and needs of the setting

- Any staff member will discuss any specific training requirements or gaps in knowledge or understanding with the DSL/s
- Staff will receive opportunities to contribute towards and inform the safeguarding arrangements
- Detailed records will be held of staff safeguarding training and ensure that no training becomes out of date.

7.0 Multi-Agency Working

AENW contributes to multi-agency working as part of its statutory duty. AENW is aware of and will follow the local safeguarding arrangements. Further details on www.safeguardingpartnership.org.uk

AENW will be fully engaged, involved, and share information with local safeguarding arrangements. Once AENW is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

AENW will work with relevant partners and agencies for the benefit of families and young person ensuring contribution to multi-agency plans to provide additional support.

Where a need for early help is identified, AENW will allow access for CSC from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

Access Education NW also recognises the particular importance of inter-agency working in identifying and preventing CSE and CCE.

- **Information sharing**

AENW recognises the importance of proactive information sharing between professionals and local agencies to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on education to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

6.0 Early Help

Early help means providing support as soon as the need emerges, at any point in a young person's life. Staff at Access Education NW recognise that any professional can provide early help. Tutors are the first point of contact for arranging pastoral support needs as directed by the DSL. If situations require more specialised support, Alison Mashiter-Coates can provide advice and make referrals as needed. Any young person or family may benefit from early help, but staff will be alert to the potential need specifically for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs
- Have SEND, regardless of whether they have a statutory EHC plan
- Have mental health needs
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Are frequently missing or going missing from care or from home
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Are at risk of being radicalised
- Is misusing drugs or alcohol
- Have family members in prison, or are affected by parental offending
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- Have returned home to their family from care
- Are at risk of HBA, such as FGM or forced marriage

- Are privately fostered
- Are displaying harmful sexual behaviours which may pose a risk to another young person and themselves
- Are persistently absent from education, including persistent absences for part of the day
- Show any other early signs of abuse, neglect any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and young person.

The DSL will take the lead where early help is appropriate and consent has been gained. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required to help provide the right, effective support at the right time.

[Early Help Assessment - information for professionals - Lancashire County Council](#)

We therefore ensure that:

- All staff and volunteers can identify the risk factors that indicate a family or young person may benefit from Early Help and to share this with the DSL
- DSLs will liaise with school, if registered, to undertake a Family Early Help Assessment, when appropriate, to identify what Early Help is required. If the young person is not registered with a school AENW will lead the referral
- DSLs will signpost and refer to appropriate support agencies
- DSLs will support schools/residential care at TAF meetings where is it appropriate for them to do so
- DSLs will follow the local safeguarding processes and refer to **Working Well with Children and Families in Lancashire** guidance using the Continuum of Need.

8.0 Abuse and neglect

Abuse is defined as a form of maltreatment of a young person which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on young person of all forms of domestic abuse. Young person may be abused in a family, institutional or community setting by those known to them

or by others, e.g., via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Young people may be abused by one or multiple adults or another young person.

Physical abuse is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, biting, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a young person. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a young person. Staff are aware of Female Genital Mutilation, a form of Physical abuse.

Emotional abuse is defined as the persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the young person's emotional development. This may involve conveying to a young person that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young person such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. **It may involve seeing or hearing the ill-treatment of another.** It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

Sexual abuse is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

Neglect is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with contextual factors outside the school and/or can occur between children outside of these environments; this includes

being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms.)

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.

All staff understand that children who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported - Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.

All staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL. Specific issues include (but are not limited to):

Domestic abuse

In line with the Domestic Abuse Act 2021, **domestic abuse** is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. **Abusive behaviour** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

The school will recognise the serious, long lasting emotional impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSL(s) are aware of the contact details and referral routes into the Local Housing Authority so that concerns and support over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

- Household debt
- Rent arrears
- Domestic abuse

- Anti-social behaviour
- Any mention of a family moving home because “they have to” or frequent moves.

Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSC will be made as necessary where concerns are raised.

Children absent from provision

Staff will be aware a child being absent from education is a potential indicator of abuse or neglect and, as such, these pupils are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation. Staff will monitor pupils that are absent from provision, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, and in accordance with the AENW Attendance Policy. AENW will inform the school of any pupil who fails to attend on each expected day,

Where reasonably possible AENW **will hold more than one emergency contact number for their pupils and students.**

Access Education NW will follow local guidance when children go missing from home <https://www.safeguardingpartnership.org.uk/missing-from-home-protocol-trigger-plan/>

Child Criminal exploitation (CCE)

Child Criminal Exploitation is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence (this could be online or through technology)

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.

- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

AENW will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. AENW will also recognise that pupils of **any gender** are at risk of CCE.

AENW staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Appearing with unexplained gifts, money or new possessions.

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered in addition to normal safeguarding procedures.

As well as the general indicators for CCE, AENW staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g., knife crime.
- Receiving requests for drugs via a phone line, moving drugs, collecting money
- Being found in accommodation they have no connection
- Owning a 'debt bond' to their exploiters
- Having their bank account used to facilitate drug dealing.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence, this could be online or through technology.

AENW will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g., through others sharing videos or images of them on social media. AENW will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. AENW will also recognise that pupils may not realise they are being exploited and they believe they are in a genuine romantic relationship.

AENW staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All staff will consider the language and terms used when raising concerns and providing ongoing support to pupils who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

Concealed and Denied pregnancy

A concealed pregnancy is when a woman knows she is pregnant but does not tell anyone; or when she tells a professional but conceals the fact that she is not accessing antenatal care; or when she tells another person or persons and together, they conceal the fact from all agencies. A denied pregnancy is when an expectant mother is unaware of or unable to accept the existence of her pregnancy. Physical changes to the body may not be present or be misconstrued; they may be intellectually aware of the pregnancy but continue to think, feel and behave as though they were not pregnant. There may be a number of reasons why a pregnancy is concealed or denied, including, but not limited to; fear of stigma or shame, in cases of rape, sexual or domestic abuse, forced or sham marriage, in cases of rape, sexual or domestic abuse, forced or sham marriage, fear of a child being removed or asylum seekers and illegal immigrants who may be reluctant to come to the attention of authorities. In some cases, the woman may be truly unaware that she is pregnant. In some cases, an expectant mother may be in denial of her pregnancy.

Where there is a suspicion of a concealed or denied pregnancy, AENW will, in collaboration with the school or care provider follow the procedures set out by our local Safeguarding Children Partnership arrangements.

[Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership \(proceduresonline.com\)](#)

Further training is available for staff regarding concealed or denied pregnancy

[Concealed-and-Denied-Pregnancy-2020-7MB.pdf \(lancshiresafeguarding.org.uk\)](#)

Modern slavery

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism. (From The Modern Slavery Act 2015, Section 52) The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking':

Female Genital Mutilation

FGM is defined as all procedures involving the 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.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with the referring school/authority/CSC and/or the police.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), tutors are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Anyone failing to report such cases may face disciplinary action. Tutors will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police, along with the DSL and or/school where an act of FGM appears to have been carried out. Unless the tutor has a good reason not to, they should also discuss any such case with the DSL and involve CSC as appropriate.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society
- The pupil coming from a community known to adopt FGM
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE
- Travel abroad or a long holiday with relatives to a country known to practise FGM.

FGM is included in the definition of **honour-based' abuse (HBA)** which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Forced marriage

Forced marriage is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g., due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to Police Child safeguarding team. It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Extremism & Radicalisation

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

Terrorism refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. AENW will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. AENW will work with school and local safeguarding arrangements as appropriate to ensure awareness of local and national incidents that may heighten the activity of extreme groups or cause increased curiosity of children.

AENW will ensure that they engage with schools and carers as they are in a key position to spot signs of radicalisation. In doing so, the school/agencies will assist and advise family

members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless there is reason to believe that the young person would be placed at risk as a result.

The DSL's will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation and ensure that all staff and governors have received appropriate and up-to date training

All DSLs understand when it is appropriate to make a referral to the Channel Panel and are aware of how to do so. 'Notice. Check. Share.'

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **the Prevent duty**, forming part of the school's wider safeguarding obligations.

Access Education NW will ensure that ALL Staff and volunteers are informed and have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty' and follow guidance from www.lancashirepreventpartnership.org.uk

The Prevent training can be accessed on www.gov.uk/guidance/prevent-duty-training

Prevent Lead	Caroline Bracewell
Prevent Curriculum Lead	Catherine Strickland

Referral Process:

All staff are training to contact the Prevent Lead if they

- become aware of an individual you feel is vulnerable to radicalisation
- suspect someone is being radicalised or encouraged to support terrorism
- or are experiencing pressure from others about this
- Report radicalisation (Prevent) [Report radicalisation \(Prevent\) - Lancashire County Council](#)

Any of the following can provide advice and support.

Immediate threat

Call 999 in an emergency if you need police assistance.

For advice on preventing radicalisation or reporting concerns in Lancashire please email:

concern@lancashire.pnn.police.uk

Call LCC Prevent team on the number for advice or support: 01772 413398

Or

- The police non-emergency number 101
- Anti-terrorism hotline 0800 789 321

More information can be found on the [Lancashire Constabulary website](#)

[Counter Terrorism Policing safeguarding website](#) is aimed at family and friends to encourage them to share concerns that a friend or loved one might be vulnerable to radicalisation. The website aims to help increase Prevent referrals from family and friends into the police by increasing awareness, trust and understanding of the police's safeguarding role.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Child-on-Child abuse including sexualised abuse

Child-on-Child abuse is defined as abuse between children under 18 years of age.

Access Education NW has a **zero-tolerance approach to abuse**, including child-on-child abuse.

Access Education NW will refer to the specific guidance in Keeping Children Safe in Education Part five: Child on Child Sexual Violence and Sexual Harassment and Lancashire Procedures. [5.31 Peer Abuse \(proceduresonline.com\)](#)

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of the provision, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.

- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation and hazing-type violence and rituals, which can 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.

All staff will be clear as to AENW's policy and procedures regarding child-on-child abuse (safeguarding) and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further. Staff must maintain the belief that sexual abuse can happen in any setting.

All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe. This process will be continually reviewed by the DSL.

AENW's procedures for managing allegations of child-on-child abuse are outlined in the AENW's Behaviour Policy/ Anti – Bullying Policy

The DSLs at AENW will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of those involved
- the development stages of the those involved
- any power imbalance between the children

- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues.

Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment, considering:

- the victim
- the alleged perpetrator
- all other young people (and if appropriate adult students and staff)
- Risk assessments (if required) will be recorded and kept under review as a minimum termly
- Refer to Guidance in Keeping Children Safe in Education Sept 2024, Part 5.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from the provision.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.

- Having been permanently excluded from school.
- Having experienced maltreatment or trauma.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Online and E-Safety

Access Education NW is committed to keeping children safe online. AENW recognises that addressing online safety issues should form an integral part of AENW safeguarding arrangements and all pupils will be made aware of online risks and taught how to stay safe online. Staff will be aware that ongoing in-person monitoring is required as students may on occasion be using their own devices during lessons, which may not have sufficient filtering in place. The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by AENW in accordance with the Staff Code of Conduct / Behaviour Policy and risk assessment. Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **“Operating equipment”** includes enabling, or securing, activation by another person without that person's knowledge, e.g., a motion-activated camera.

Upskirting will not be tolerated by AENW. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

Sharing nude and semi-nude images

Formerly referred to as 'Sexting', sharing nudes and semi-nudes is defined as *the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums.* (UKCIS, 2020)

UKCIS – Sharing nudes and semi-nudes: advice for education settings (UKCIS, 2020)
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

AENW will ensure that all staff are aware to treat the sharing of indecent images as a safeguarding concern.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes/semi-nudes that involves indecent images of a pupil, they will refer this to the DSL as soon as possible. Where a pupil confides in a tutor about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

Aggravated: incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes; - including where there is an adult involved, where there is an intent to harm the pupil or where the images are used recklessly.

Experimental: incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse.

Where it is necessary to view the imagery, e.g., if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- never copy, print, share, store or save them; this is illegal.
- discuss the decision with the headteacher or a member of the senior leadership team
- make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the directors.
- make sure viewing takes place with another member of staff present in the room, ideally one of the directors.
- wherever possible, make sure viewing takes place on the premises of the AENW offices.
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called.

The above summarised points are explained in further detail with important supporting guidance in the UKCIS guidance – Sharing nudes and semi-nudes: advice for education settings <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Context of safeguarding incidents

Safeguarding incidents can occur outside of education and can be associated with outside factors. All staff, particularly the DSL and deputy DSL(s), will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. AENW will provide as much contextual information as possible when making referrals to school, CSC or external agencies.

8.0 Pupils potentially at greater risk of harm

Access Education NW recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

- **Pupils who need social workers**

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from their LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g.

responding to unauthorised absence, and promoting welfare and educational outcomes, e.g., considering the provision pastoral or academic support and support with behaviour.

- **Looked After**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously CLA, also known as care leavers, can also remain vulnerable after leaving care.

AENW will ensure that the appropriate staff have the information they need, such as:

Looked after legal status, i.e., whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.

Contact arrangements with parents or those with parental responsibility.

Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

- **Pupils with SEND**

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability

Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs

Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND will liaise with the pupil's school/parents/carers where appropriate, to ensure that the pupil's needs are met effectively.

- **LGBTQ+ pupils**

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. All staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

- **Adverse Childhood Experiences and trauma (ACES's)**

We acknowledge that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

All staff will be made aware of the long-lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development and adaptive teaching requirements.

9.0 Concerns about staff and safeguarding practices

If a staff member has concerns about another member of staff (including supply staff and volunteers) it will be raised with the director.

Any concerns regarding the safeguarding practices at the school will be raised with the directors, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with one of the directors, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

10.0 Allegations of abuse against staff and low-level concerns

There are clear policies in line with those from the CSAP (Children's Safeguarding Assurance Partnership) for dealing with allegations against people who work with children.

All allegations against staff or volunteers, will be managed in line with AENW Whistleblowing Policy – a copy of which will be provided to, and understood by, all staff at induction. AENW will ensure all allegations against staff, including those who are not employees of AENW, are dealt with appropriately and that AENW liaises with the relevant parties.

When managing allegations against staff, AENW will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”. Allegations that meet the harms threshold include instances where staff have:

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

All staff at Access Education NW are aware of these procedures and aware of the following expectations and protocol: -

- ALL staff and volunteers are aware that they must refer allegations or concerns around staff conduct to one of the directors
- CSAP procedures for dealing with allegations against staff will be followed http://panlancashirescb.proceduresonline.com/chapters/p_allegations.html
- ALL staff and volunteers remember that the welfare of the child is paramount and that they have a duty to inform Directors if any adult's conduct gives cause for concern
- All staff recognise the importance of sharing and reporting low-level concerns (see below guidance on low-level concerns) surrounding staff or any adult in a position of trust to the directors.
- ALL staff are aware of AENW Whistle Blowing Policy which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place
- Staff are fully aware of AENW Tutor Guidance and Expectations and are aware of professional expectations of their own behaviour and conduct.

- Further information, LADO information and flowchart of how allegations are managed are available at www.lancashire.gov.uk/threshold-matrix-lado-march-2022

Access Education NW recognises that children may make disclosures against someone who is in a position of trust / is working or volunteering with children, not in the AENW setting. This may be an adult in a place of worship, a sports coach or a club leader. After ensuring that the child is safe, we recognise that we must refer to the LADO and share information.

- **Low Level Concerns**

Access Education NW ensure that all staff are aware of how to recognise and report **low level concerns** around staff behaviour or conduct.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Access Education NW will promote an open and transparent culture in which all concerns about all adults working in or on behalf of AENW (including supply teachers &volunteers), are dealt with promptly and appropriately. Access Education NW will strive to embed a culture of openness, trust and transparency in which AENW values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

Access Education NW will ensure that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All staff are clear on how to report low level concerns and will be empowered to do so. Staff must report their concerns to the Directors. If concerns are surrounding the Directors, this must be referred to the LADO. Guidance from Keeping Children Safe in Education, September 2024, will be followed in view of recording and storage of such concerns.

If in doubt whether the concern is a low-level concern, the Directors will consult with LADO for guidance.

The governing body will ensure low level concern procedures and staff behaviour expectations are clearly addressed within the staff code of conduct and procedures are implemented effectively, ensuring that appropriate action is taken in a timely manner to safeguard children and facilitate a whole provision approach to dealing with any concerns.

11.0 Safer recruitment

Access Education NW is committed to keeping pupils safe by ensuring that adults who work or volunteer in school are safe to do so. We therefore ensure that:

Keeping Children Safe in Education, September 2024, Part 3 guidance is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for teaching, training, instructing or the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

(Regular is defined as; at least 3 times in a 30-day period.)

The directors will conduct the appropriate pre-employment checks for all prospective employees.

AENW will ensure that:

- The appropriate DBS and suitability checks will be carried out for all staff, volunteers, and contractors. The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.
- The original DBS certificate is seen for all appointees to the school, even where the on-line DBS system indicates that the check is clear.
- There are sufficient staff who have undertaken appropriate Safer Recruitment training in the last 5 years and reached the required standard as verified by the course facilitators, to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel
- Written assurances will be obtained from agencies and other employers that provide staff to work in school, to confirm that appropriate pre-employment checks have been undertaken in line with Keeping Children Safe in Education, September 2023

- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer
- Conduct an online search as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online and will inform shortlisted candidates of this procedure
- Advice will be sought from Human Resources, LADO and/or Schools Safeguarding Officers if any staff are unclear about any aspects of Safer Recruitment.

12.0 Referral to the DBS

There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

13.0 Single central record (SCR)

AENW keeps an SCR which records all staff, including agency, third-party supply staff and contractors who work at AENW even if they work for one day.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions (governors)
- Any other information deemed relevant.

If any checks have been conducted for volunteers, these may also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS

check, (with/without a barred list check, depending on whether they are in regulated activity), the risk assessment will be recorded.

The details of an individual will be removed from the SCR once they no longer work or volunteer at the school.

Designated Safeguarding Lead	Alison Mashiter Coates	Advanced DSL July 2024 – renew 2026 alison@accesseducationnw.org
Deputy DSL	Caroline Bracewell	caroline@accesseducationnw.org
Prevent Lead	Caroline Bracewell	caroline@accesseducationnw.org
LCC School Safeguarding Officers	Victoria Wallace, Mechelle Lewis and Sarah Holyhead	Safeguarding Advice Line - 01772 531196
LCC MASH Education Officers	Matt Chipchase and Martine Blokland	Martine Blokland 01254 220914 martine.blokland@lancashire.gov.uk Matt Chipchase 01254 220989 matt.chipchase@lancashire.gov.uk MASH – Multi-Agency Safeguarding Hub 0300 123 6720 0300 123 6722 between 5.00pm - 8.00am
LADO – Local Authority Designated Officers	Tim Booth, Donna Green and Shane Penn	01772 536694 LADO.admin@lancashire.gov.uk

14.0 Procedures for reporting any concerns at AENW

All staff have responsibility for reporting safeguarding concerns and know who the DSLs

Staff inform the DSL or Deputy DSL about any safeguarding concerns and seek advice as needed if unsure about a specific situation.

Some minor concerns/general information relating to a young person, which needs to be logged for monitoring but not reported to the DSL as a safeguarding concern, are reported on the learning plan and the DSL is 'alerted' to the note so that they are aware of the situation.

All safeguarding concerns are to be reported on the AENW Safeguarding concern form and emailed to office@accesseducationnw.org

