

Safeguarding Policy

September 2025 (to be reviewed annually)

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on a yearly basis by a named person responsible below, who shall be accountable for that action.

Policy	Attendance Policy	
Date created	January 2022	
Date for Review	1 st review: September 2023	
	2 nd review due: September 2024	
	3 rd review due: September 2025	
	4 th review due: September 2026	
Signed:		
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Jo Garner	J. Garner	

Key Contacts

Contact	Telephone	Email
First Point of Contact (FPOC)	0345 678 9021	
LADO – Ellie Jones	0345 678 9021	lado@shropshire.gov.uk
NSPCC	0808 800 5000	help@nspcc.org.uk
Shropshire Virtual School	01743 250 124	virtualschool@shropshire.gov.uk
Shropshire SEN Team	01743 254267	senteam@shropshire.gov.uk



Our Safeguarding Team		
Designated Safeguarding Lead	Jo Garner	
Designated Teacher for Looked-After and Previously Looked-After Children		
Director, Reach for Inclusion Ltd		
Designated Safeguarding Lead	Siobhan Williams	
Designated Teacher for Looked-After and Previously Looked-After Children		
Director, Reach for Inclusion Ltd		
Deputy Safeguarding Lead	Hannah Byrnes	
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Deputy Safeguarding Lead	Erin Fletcher	
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Deputy Safeguarding Lead		
Business & Operations Manager		
Deputy Safeguarding Lead	Tor West	



Safeguarding is the action taken to promote the welfare of children and protect them from harm. This includes: protecting children from maltreatment; preventing the impairment of their mental and physical health or development; ensuring they grow up with safe and effective care; and taking action to enable all children to have the best outcomes.

Safeguarding also extends to vulnerable adults where they may be mistreated, neglected or harmed by another person in a position of trust. At Reach for Inclusion, we work directly with children and young people, and in the course of this work we may encounter individuals who give rise to safeguarding concerns or who disclose information relevant to their safety and wellbeing.

We are committed to ensuring all children and young people's welfare is safeguarded and will therefore take any concerns seriously. This policy and the procedures within it are designed to ensure we safeguard the children and young people we encounter as part of our work. This policy applies to all staff as well as any contractors, it covers children under the age of 18 as well as vulnerable adults.

Safeguarding means:

Protecting children from abuse and maltreatment

Preventing harm to children's health or development

Ensuring children grow up with the provision of safe and effective care

Taking action to enable all children and young people to have the best outcomes

All children and young people have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity and some will be particularly vulnerable, for example, where they are disabled or have special educational needs. We will always seek to work inclusively and actively to combat discrimination.

Legal and Statutory Framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children, including:

The Children Act 1989

United Nations Convention on the Rights of the Child 1991

Data Protection Act 2018

Sexual Offences Act 2003

Children Act 2004

Protection of Freedoms Act 2012

Keeping Children Safe in Education 2025 (DfE)

Equality Act 2010

Working Together to Safeguard Children (statutory guidance)

Any other relevant government guidance on safeguarding children

1. Reporting a safeguarding concern



A safeguarding concern is where you have concerns about a child or vulnerable adults' welfare or believe they are at risk of harm. The key Designated Safeguarding Leads (DSL's) for Reach for Inclusion are:

Siobhan Williams 07869 841260

Jo Garner 07510 063394

Teachers, Mentors and key support workers are in a unique position to observe children and young people's behaviour over time and often develop close and trusting relationships with them.

If you have a safeguarding concern about a child or young person you encounter as part of your work or if a child or young person discloses directly to you, then you must act immediately and speak to the Designated Safeguarding Lead(s).

Inform the DSL in person and or in writing.

Make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the young person's own words as far as possible.

All notes should be timed, dated and signed, with the name printed alongside the signature.

Report your logged concern to Reach for Inclusion's Designated Safeguarding Lead as soon as possible, but at the very least, within the same day.

If the DSL deems that a risk is posed, they will report the concern to the young persons' key referrer; Named school / Virtual school link / SEN case worker / Social worker on the same day to inform them of the risk.

The DSL will also inform the Designated Safeguarding Lead of the school where the young person is on role in person and /or in writing on the same day.

If your concern involves the person working with the young person, report it to the Designated Safeguarding Lead.

If your concern involves a Designated Safeguarding Lead, you should report your concern to an alternative Safeguarding Lead. See section 2.

In any case, NSPCC can provide advice: help@nspcc.org.uk / 0808 800 5000.

Managing a Disclosure

If a child discloses information relating to safeguarding during a mentoring or learning session, you should:

Let them know that the information cannot be kept confidential but that you will make sure you tell someone who can help.

Avoid asking any leading questions or offering an opinion on what has happened.

Record what was said as soon as possible and keep this information secure. Stick to a factual account rather than what you think about it.

Follow the procedures set out in section 1 on reporting a concern.



Decide whether the child or young person is at risk of immediate harm and, if so, call the police

There are keywords that, when used, should be triggers for action, regardless of intent. In the case of violent, sexual, racist or prejudiced language, the least that should happen is a record of the incident, a discussion with the child, and parents/carers/referrers informed, i.e rape, rapist, sexual assault or forced sexual activity.

Do not force the child to repeat what he/she said in front of another person.

Following a disclosure, the member of staff should talk immediately to the Designated Safeguarding Lead and complete a written record. The parents/carers should be informed, unless it will place a child at further risk of significant harm.

Remember:

Not all children may feel ready or know how to tell someone they are being abused, but staff must remain alert to signs that they may be experiencing harm even without disclosure.

Listen carefully, take it seriously and be non-judgemental

Reassure them that they are right to tell, and it is not his/her fault

Negotiate getting help - tell them that you must pass the concern to someone who is trained to help them

Afterwards, make careful records of what was said and give to the Designated Safeguarding Lead as soon as is practically possible (always within the same day)

Maintain confidentiality, only pass information on to the DSL / DDSL

If they are in immediate danger call the police and stay with them until the police arrive

2. Whistle-blowing

If you have concerns about a colleague within Reach for Inclusion or anyone contracted to work for Reach for Inclusion, you should share these immediately with the Designated Safeguarding Lead. If the concern involves the DSL, you should contact the NSPCC for advice on help@nspcc.org.uk / 0808 800 5000.

3. Early Help

We believe that any child may benefit from early help, and we ensure that all staff are alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs,
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan),
- has a mental health need,
- is a young carer,
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines,



- is frequently missing/goes missing from education, care or from home,
- has experienced multiple suspensions, and is at risk of being permanently excluded,
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation,
- is at risk of being radicalised or exploited,
- has a parent or carer in custody, or is affected by parental offending,
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse,
- is misusing drugs or alcohol themselves,
- has returned home to their family from care,
- is at risk of so-called 'honour-based' abuse such as Female Genital Mutilation or Forced Marriage,
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the school day.

4. Abuse, Neglect and Exploitation

All staff are trained on the indicators of abuse, neglect and exploitation, and understand children can be at risk of harm inside and outside of Reach Learning Centre, and inside and outside of the home, and online. Staff will exercise professional curiosity and know what to look out for because this is vital for the early identification of abuse and neglect to identify cases of children who may be in need of help or protection.

We believe that abuse, neglect, exploitation and safeguarding issues are rarely standalone events. All staff, but especially the DSL and their deputies will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familiar harms take a variety of different forms and children can be vulnerable to multiple harms.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. We understand children are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently via both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.



Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. The fabrication or induction of illness (FII) in children is a relatively rare form of child abuse. Where concerns exist about FII, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information'. We adopt the guidance Safeguarding Children in whom illness is fabricated or induced Overview - Fabricated or induced illness - NHS

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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 children frequently to 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, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

5. Safeguarding Issues

All staff are trained on safeguarding issues that can put children at risk of harm.



Child-on-child abuse

KCSIE 2025 requires a clear zero-tolerance approach to all forms of child-on-child abuse, including sexual harassment, sexual violence and harmful sexual behaviour. Staff must not downplay inappropriate comments or actions, as this risks creating a culture in which abuse is normalised.

All staff are aware that children can abuse other children. This can happen inside or outside of our setting and online.

All staff will be trained in our policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding to where they believe a child may be at risk from it.

All staff understand that even if there are no reports in our setting it does not mean it is not happening, it may be abuse is just not being reported. When staff have any concerns regarding child-on-child abuse, even if there are no reports in our setting, they should still speak to the DSL (or a deputy).

All staff are expected to challenge inappropriate behaviours between peers, examples of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an element of online which facilitates, threatens and/or encourages physical abuse),
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse,
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual sharing of nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery);
- up-skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).



We recognise that any child can be vulnerable to child-on-child abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse among all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers.

We know that research suggests:

- child-on-child abuse may affect boys differently from girls (i.e., that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously,
- children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without, and
- some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

Child-on-child sexual violence and sexual harassment

All those who are part of our community believe that sexual violence and sexual harassment is not acceptable and will not be tolerated.

We understand that sexual violence and sexual harassment can occur between two or more children of any age and sex. It can occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap.

We recognise that children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

We will work to ensure our whole community are aware of the importance of:

- challenging inappropriate behaviours,
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up,
- not tolerating or dismissing sexual violence or sexual harassment, and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

For the purpose of this policy, we use the term 'victim', 'alleged perpetrator(s)' or where appropriate 'perpetrator(s)'. Ultimately, the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.



Along with providing support to children who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. We recognise that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our setting. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

We understand that reports of sexual violence and sexual harassment are extremely complex to manage. We know it is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We also know it is also important that other children, adult students and our staff are supported and protected as appropriate.

We will try to be aware of, and respond appropriately to all reports and concerns, including those outside of our setting, and or online.

While the focus of this policy is on protecting and supporting children, we will of course protect any adults and engage with adult social care, support services and the police as required.

Our approach to preventing all forms of child-on-child abuse

We will undertake pre-planning, training for staff and implement an effective child-on-child abuse policy to help us develop the foundation for a calm, considered and appropriate response to any reports. We will review these regularly. The DSL (or a deputy) will engage with the local response to child-on-child abuse.

We understand the best responses to child-on-child abuse are based on a whole setting approach to safeguarding and child protection and we will involve our whole community in this.

Systems are in place, well promoted throughout our setting, and understandable and accessible for our young people to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

We recognise both CSE and CCE are forms of abuse. They both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, it may involve being in exchange for something the victim needs or wants, and/or for the financial advantage or increased threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved for the purpose of exploitation. Information on CCE definition can be found on p.48 of Home Office's Serious Violence Strategy.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation.



In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

We will provide additional support to children who have been exploited to help maintain them in education.

Staff understand that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, they are aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

If we feel that children may be being abused through exploitation, we will follow the Local Authority exploitation care and support pathway.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

We recognise that this type of exploitation can trap children as perpetrators, can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into



carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Child Sexual Exploitation (CSE)

CSE is a type of modern slavery when a male or female under 18 is sexually exploited for the benefit or gain of someone else. The benefit or gain can come in many forms such as increased social status or financial gain. Some victims are also trafficked for the purpose of exploitation. Multiple tactics are used to exploit the child such as 'grooming' which is when the victim is given something, such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money in return for performing sexual activities or having sexual activities performed on them. Other methods may include violence, bullying and intimidation, with threats of physical harm or humiliation. Abusers are increasingly using the internet to target vulnerable children. It can happen across any device that's connected to the web, like computers, consoles, tablets, mobile phones and smart speakers. Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming.

We also acknowledge the definition of CSE set out by the Department for Education. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. It may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

We will make the following further information on signs of a child's involvement in sexual exploitation available to staff:

https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners



County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including our setting, other education settings, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing from school or home and are subsequently found in areas away from their home,
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime),
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs,
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection,
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity,
- owe a 'debt bond' to their exploiters, and
- have their bank accounts used to facilitate drug dealing.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.



Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child-safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Homelessness

We understand that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As appropriate, we will make referrals and/or hold discussions with the Local Housing Authority. However, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

We will consider homelessness in the context of children who live with their families, and intervention will be on that basis.

We recognise in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. In these cases, we will follow the department and the Ministry of Housing, Communities and Local Government joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.



So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage) We recognise that so-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices, such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take. We see all forms of HBA as abuse (regardless of the motivation) and will handle and escalate as such. We will ensure our community are alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or a deputy). As appropriate, they will activate the local safeguarding procedures by contacting Family Connect/local social care team for the child and if necessary, the police.

Female Genital Mutilation (FGM)

We understand that FGM comprises of 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 a form of child abuse with long-lasting harmful consequences.

We will follow the National FGM Centre:

 $\underline{\text{https://nationalfgmcentre.org.uk/wp-content/uploads/2019/06/FGM-Schools-Guidance-National-FG}\\ M-Centre.pdf$

Forced marriage

We understand that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We play an important role in safeguarding children from forced marriage.

We will follow the Forced Marriage Unit published statutory guidance and Multiagency guidelines. Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email fmu@fco.gov.uk



Preventing Radicalisation

This preventing radicalisation section remains under review, following the publication of a new definition of extremism on the 14 March 2024.

We understand children may be susceptible to radicalisation into terrorism. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our safeguarding approach.

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

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

We understand it is, where possible, our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which must include reporting their concerns to the DSL (or a deputy) who will consider making a Prevent referral.

The Prevent duty

We are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

We see The Prevent duty as part of our wider safeguarding obligation. Our DSL and deputies and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141 - 210.

For our post 16 learners, we will follow the additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

We will follow the published advice for schools on the Prevent duty.

We aim to ensure all staff have completed training on the Prevent duty.



If we feel children are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU). This is done with a Prevent referral form, following the Prevent flowchart. The referral will be sent to the police. As with all referrals, this referral will be dealt with appropriately with professionals.

Online Safety

We recognise online safety is a major concern for all professionals.

We believe it is essential that children are safeguarded from potentially harmful and inappropriate online material. We will take an effective whole setting approach to online safety to empower us to protect and educate our young people and staff in their use of technology.

The aim of our approach to online safety is empowerment to protect and educate young people and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. We will ensure appropriate filtering and monitoring on school/college devices and networks. We aim to protect children from illegal, inappropriate or harmful content, and harmful online interaction with other users. We aim for our young people to exhibit positive personal online behaviour and recognise inappropriate online conduct. We aim to protect children from commercial risks.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our young people or staff are at risk, we will report it to the Anti- Phishing Working Group (https://apwg.org/).

We will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any staff training, the role and responsibilities of the DSL (and deputies) and any parental engagement.

We take seriously our duties to assist parents and help them with online safeguarding resources. As such, we will make them aware of relevant support services.



Where children are being asked to learn online at home we will follow the advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. We recognise the NSPCC and PSHE Association also provide helpful advice.

Through our regular communications with parents, we will reinforce the importance of children being safe online and tell parents what systems we use to filter and monitor online use. We will make parents aware of what their children are being asked to do online, including the sites we asked them to access. We will always be clear who from our organisation (if anyone) a child is going to be interacting with online.

While considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, we will do all that we reasonably can to limit children's exposure to risks from our IT system. We will ensure we have appropriate filters and monitoring systems in place. The leadership team and relevant staff, such as online safety lead will obtain an understanding of the filtering and monitoring provisions in place and manage them effectively and know how to escalate concerns when identified. We will do this by considering the age range of our children, the number of children, how often they access the IT system and the proportionality of costs versus risks.

In line with KCSIE 2025, our filtering and monitoring systems will be:

- appropriate, regularly reviewed, and effectively managed;
- subject to clear roles and responsibilities for oversight;
- formally reviewed at least annually;
- proportionate to the age and number of children using the system, and the risks they may face.

We have the appropriate level of security protection in place; in order to safeguard our systems, staff and learners and we will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We will carry out an annual review of our approach to online safety.

6. Consent and confidentiality

Before working with a child or young person, appropriate consent will be obtained from the school, referrer, parent, carer or guardian, or the young person themselves.

Unless specifically agreed, children should remain anonymous in all correspondence and all personal data should be kept securely.

7. Training and induction

All staff and contractors will be given this safeguarding policy before working for Reach for Inclusion and will be DBS checked before carrying out work that gives them unsupervised or regular contact with young people or before gaining access to sensitive or personal data.

Designated safeguarding staff will receive designated person training.



Referees for new staff will be asked if there have been any safeguarding concerns about applicants.

Safeguarding training will be provided for staff, with refreshers every year. Training will cover all relevant issues, including, abuse and neglect, child-on-child abuse, extremism and radicalisation.

A record of DBS disclosure numbers will be held in a secure digital format.

8. Reach for Inclusion Storage of Special Category Personal Data (GDPR Amendment 85)

Reach for Inclusion will keep relevant, adequate, non -excessive personal information about safeguarding concerns that are accurate and up to date for 7 years for Child Protection and Safeguarding Vulnerable Adults.

Reach for Inclusion will also keep records regarding concerns about an adult working with children or vulnerable adults for 10 years (or longer where necessary – see below).

When the retention period finishes, Reach for Inclusion's Safeguarding Lead will securely delete records in the presence of one other member of staff. Safeguarding concerns will be kept electronically in an encrypted file with access only available to the Designated Leads. Access to Safeguarding concern files will only be on a "need to know" basis. A log will be kept of who has access to the confidential files.

Information about child protection/adult safeguarding concerns and referrals are kept in a separate safeguarding file for each child/young person/vulnerable adult.

Reach for Inclusion will keep a record of concerns that were raised about a child or vulnerable adult's welfare that have not been shared with the police and/or social care.

9. Managing allegations against staff or volunteers

All allegations of abuse of children by those who work with children (whether in a paid or unpaid capacity) must be taken seriously.

The management of allegations should be seen in the wider context of safer employment practices, which has three essential elements:

Safer recruitment and selection practices

Safer working practices

Management of allegations or concerns

The Local Authority Designated Officer (LADO) is involved in the management and oversight of allegations against people who work with children. This applies to allegations against paid and unpaid workers, volunteers, casual and agency workers or anyone self-employed. The LADO is involved from the initial phase of the allegation through to the conclusion of the case.

Working Together to Safeguard Children Guidance 2018 (page 60) states:

'An allegation may relate to a person who works with children who has:

behaved in a way that has harmed a child, or may have harmed a child



possibly committed a criminal offence against or related to a child

behaved towards a child or children 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'

The regional procedure <u>1.14 Allegations against Staff or Volunteers</u> describes what action should be taken if the above criteria is met. (Regional Child Protection Procedures for West Midlands)

All allegations that meet the criteria must be reported to the LADO by contacting the First Point of Contact (FPOC) on 03456 789021.

10. Recording concerns about adult behaviour

Reach for Inclusion will keep clear, accurate, contemporaneous and comprehensive records of all allegations made against adults working or volunteering with children or vulnerable adults. Records must be timed, dated and recorded as soon as possible. Records must include:

what the allegations were;

how the allegations were followed up;

how things were resolved;

any action taken;

and decisions reached about the person's suitability to work with children and vulnerable adults.

Keeping these records will enable Reach for Inclusion to give accurate information if ever asked for it. For example: in response to future requests for a reference; if a future employer asks for clarification about information disclosed as part of a disclosing and barring check; or if allegations resurface after a period of time.

If concerns have been raised about an adult's behaviour around children or vulnerable adults, Reach for Inclusion will keep the records in their personnel file either until they reach normal retirement age or for 10 years – whichever is longer (IRMS, 2016). Reach for Inclusion will keep records for the same amount of time regardless of whether the allegations were unfounded. However, if Reach for Inclusion finds that allegations are malicious the records will be destroyed immediately.

Information will be kept for this length of time even if the person stops working for Reach for Inclusion. In some cases, records can be kept for longer periods of time. For example, if: the records provide information about a child/ vulnerable adult's personal history, which they might want to access at a later date; the records have been maintained for the purposes of research; the information in the records is relevant to legal action that has been started but not finished; or the records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).

Where there are legal proceedings, Reach for Inclusion will seek legal advice about how long to retain the records.

11. Safer recruitment and selection of staff

With regard to the recruitment of staff, Reach for Inclusion follows the relevant policies and procedures in this policy and those in DfE guidance.



Reach for Inclusion is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

The successful applicant will be subject to an enhanced disclosure from the DBS.

The recruitment process is robust in seeking to establish the commitment of candidates to support Reach for Inclusion's measures to safeguard children and to deter, reject or identify people who might pose a risk to children or are otherwise unsuited to work with them.

12. Reviewing Safeguarding Policies (Including retention, storage and destruction of records)

This safeguarding policy will be reviewed annually, or earlier if required, to reflect any updates in statutory guidance. It has been updated in line with Keeping Children Safe in Education 2025 and will continue to be revised to meet future statutory requirements.

Reach for Inclusion will review retention and storage arrangements of Child Protection and Safeguarding Vulnerable Adults records regularly to make sure it is effective and continues to comply with current legislation and guidance. This will be carried out as part of a wider review of Reach for Inclusion's safeguarding policies and procedures.

Policy	Attendance Policy	
Date created	January 2022	
Date for Review	1 st review: September 2023	
	2 nd review due: September 2024	
	3 rd review due: September 2025	
	Next review due: September 2026	
Signed:		
Siobhan Williams	S Williams	
Jo Garner	J. Garner	