



## Phoenix ND Education Ltd Child Protection and Safeguarding Policy and Procedure

<b>Policy written:</b>	<b>July 2024</b>
<b>Policy review date:</b>	<b>July 2026</b>
<b>Signed by director and DSL:</b>	<i>E. Barnett</i>

The policy will be reviewed annually as a minimum, unless lessons learnt or new legislation, national or local guidance suggests the need for an earlier date of review.

### Policy review dates and changes

Review date	By whom	Summary of changes made	Date ratified by directors	Date implemented
July 2024	Eloise Barnett	Edits to reflect DCC guidance	07/07/2024	08/07/2024
July 2025	Eloise Barnett	Reflection of updated KCSIE 2025. Change of personnel for DDSL and DSCL. Removal of proforma for safeguarding forms as these are now contained within LearnTrek.	17/08/2025	17/08/2025

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## 1. Key Safeguarding Contact details:

Owner and Director, **Designated Safeguarding Lead (DSL) and Safer Recruitment Lead:**  
Eloise Barnett: [eloise.barnett@phoenixndeducation.co.uk](mailto:eloise.barnett@phoenixndeducation.co.uk)

Darley Dale Provision Manager, **Deputy Designated Safeguarding Lead (DDSL)**  
Designated DSL:  
Lindsey Wills: [lindsey.wills@phoenixndeducation.co.uk](mailto:lindsey.wills@phoenixndeducation.co.uk)

Derbyshire Safeguarding can be found via this link:  
<https://derbyshirescbs.proceduresonline.com/contacts.html>

Nottinghamshire Safeguarding contacts can be found via this link:  
[https://nottinghamshirescb.proceduresonline.com/local\\_resources.html#contacts](https://nottinghamshirescb.proceduresonline.com/local_resources.html#contacts)

## 2. Introduction

This child protection/safeguarding policy outlines how Phoenix ND Education Ltd will safeguard and promote children's welfare to keep our learners safe from abuse, neglect, and exploitation.

The policy applies to all adults, including volunteers, directors, supply staff and contractors working in or on behalf of the setting.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Taking action to enable all children to achieve the best outcomes

Children includes everyone under the age of 18.

We help to keep children safe by:

- Providing safe environments, with secure access, where children can learn and develop

- Acting in the best interests of children to protect them online and offline, including when they are receiving remote education
- At the earliest opportunity, identifying children who may need early help, and who are at risk of harm or have been harmed. This can include, but is not limited to, neglect, abuse (including by other children), grooming or exploitation
- Taking timely and appropriate safeguarding action for children who need extra help or who may be suffering, or likely to suffer, harm. This includes, if required, referring in a timely way to those who have the expertise to help
- Using safe recruitment processes and managing allegations that may meet the harm threshold and allegations/concerns that do not meet the harm threshold, referred to as low-level concerns

We will ensure that parents/carers and our partner agencies are aware of our child protection/ safeguarding policy by ensuring that it is on the company website.

Parents/carers will be informed of the policy at initial meetings and visits.

The company website will also have information about how parents/children/other agencies can contact the designated safeguarding lead and their deputy and include their availability during out of school hours and school holidays.

Phoenix ND Education Ltd operates a provision wide approach and ethos to safeguarding and protecting children. Where safeguarding is concerned, we maintain an attitude of *“it could happen here”*. We recognise that everyone in the provision has a role to play to keep children safe; this includes ensuring children feel heard and understood, identifying concerns, sharing information, and taking prompt action. Safeguarding and child protection is incorporated in all relevant aspects of processes and policy development. All systems, processes and policies operate with the best interests of a child at their centre.

We ensure that all children are safeguarded while on or off provision premises and are proactive about anticipating and managing risks that children face in the wider community and online. To support this the provision assesses the risks and issues in the wider community when considering the well-being and safety of its learners. Due to the context of our provision, our children may be at greater risk of all types of abuse.

Documented within this policy are relevant contact details relating to safeguarding at Phoenix ND Education Ltd along with both Derbyshire and Nottinghamshire Local Authority. It is important to note that Phoenix ND Education Ltd also work with individuals from other local authorities, outside of Nottinghamshire and Derbyshire. Where a concern arises for an individual or their family contact must be made with the appropriate local authority.

The provision recognises we have an important role to play in multi-agency safeguarding arrangements and contributes to multi-agency working as set out in *Working Together to Safeguard Children (2018)* (*Note: this is currently under consultation*). As a relevant agency, the provision understands its role within local safeguarding arrangements and operates in accordance with Nottinghamshire Safeguarding Children Partnership (NSCP) and the Derby and Derbyshire Safeguarding Children multi-agency procedures, including the local criteria for action (known as the Threshold document) and local protocols for assessment in Derby and Derbyshire.

Phoenix ND Education Ltd is also aware of and implements any local learning where appropriate, such as those as outlined in DDSCP Briefing note: safeguarding school age children and learning from case reviews and other DDSCP briefing notes located in the multi-agency safeguarding children procedures document library. We work closely with all agencies involved in the support and treatment of our students. Senior members of staff attend PEP and TAF/TAC meetings as required, as well as liaise with agencies such as CAMHS, Social Care and the early help teams.

### 3. Legal Framework

This policy enables Phoenix ND Education Ltd to carry out our functions to safeguard and promote the welfare of children and must be read alongside key guidance:

- Department for Education's [statutory guidance](#) publications for schools and local authorities, including:
  - [Working Together to Safeguard Children](#) (2018)
  - [Keeping children Safe in Education](#) (July 2025)
  - [Designated teacher for looked-after and previously looked-after children](#) (2018)
- [Human Rights Act](#) (1998) and [Equality Act](#) (2010), including the Public Sector Equality Duty
- [Data Protection Act](#) (2018) and [UK GDPR](#)
- [Prevent Duty Guidance](#) (2015)
- [Derby and Derbyshire Multi-agency Safeguarding Children procedures](#)

Safeguarding is not just about protecting children from deliberate harm, neglect, or failure to act, it relates to broader aspects of care and education. This policy therefore complements and supports a range of other policies, such as:

- Children's health and safety and well-being, including their mental health
- Behaviour policy, including how we engage learners struggling to engage in school, mental health and behaviour, acceptable and non-acceptable behaviours, how we prevent and respond to bullying including cyber bullying, prejudiced based and discriminatory bullying and child-on-child abuse. This policy also outlines the

provision screening, searching, and confiscating powers and how they will be used safely, proportionately, and appropriately, including police strip searches

- Use of reasonable force/physical intervention, including the increased vulnerability of children with special education needs (SEN) or disabilities and equality duties
- Attendance, including children who are absent from education particularly on repeat occasions and/or prolonged periods or go missing from education, home, or care
- Meeting the needs of learners with medical conditions
- Providing first aid
- Educational visits
- Intimate care and emotional well-being
- Online safety, including use of mobile and smart technology, online safety at school and at home and other associated issues, including sharing nudes and semi-nudes, use of mobile phones/devices in school, appropriate filtering and monitoring, and how children can be kept safe from terrorist and extremist materials
- Safer recruitment and selection, including single central record
- Staff behaviour (code of conduct), including low level concerns, managing allegations against staff, including supply staff, contractors and volunteers incorporating 'duty to refer' and whistleblowing, acceptable use of technologies/mobile devices, staff/learner relationships and communications, including the use of social media
- Security and visitors
- Policy/agreement for visiting speakers
- SEND annual information report
- Relationships education (RE)/relationships and sex education (RSE) and health education (physical and mental well-being)
- Communications
- Complaints procedure
- Information sharing

#### 4. Definitions

Phoenix ND Education Ltd recognises and adheres to the statutory legislation and guidance surrounding safeguarding and child protection. It adheres to the definition of safeguarding given in Keeping Children Safe in Education (July 2025), along with the duty to both children and adults at risk. Safeguarding is defined by Keeping Children Safe in Education (July 2025) as follows:

“Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children’s mental or physical health or development; ensuring that children grow up in circumstances

consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.”

“Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.” **KCSIE 2025**

Child Protection refers to the specific actions that are taken to protect a child or children who are suffering from, or who are likely to suffer from, abuse. As defined in the Children Act (2004), a child is anyone who is yet to reach their 18th birthday.

Child protection relates to any child (under 18) who has suffered from, or may be at risk of physical injury, neglect, emotional abuse or sexual abuse.

Adults at risk from abuse. The term “adults at risk” replaces the previous terminology used of “vulnerable adults”. Adults at risk are defined as people over the age of 18 “who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation” (NHS England, 2019).

Phoenix ND Education Ltd recognises the importance of contextual safeguarding in working to ensure the safety and wellbeing of children, young people and adults at risk. We are committed to understanding the extra-familial risks that may impact upon our students’ safety and where necessary will work in partnership with our safeguarding partners to ensure that such factors are considered when action is taken to safeguard a child, young person or adult at risk.

## **5. Staff Roles and Responsibilities**

### **The role of the Designated Safeguarding Lead**

The Designated Safeguarding Lead (DSL) within Phoenix ND Education Ltd with responsibility for safeguarding and child/adult protection is Elosie Barnett (Phoenix ND Education Ltd Director) The Deputy Designated Safeguarding Lead is Lindsey Wills.

The role of the Designated Safeguarding Lead is to:

- Review and update the policy and any related policies/ procedures at least annually, or as required by updates to legislation and national guidance
- Oversee the development and implementation of robust safeguarding procedures, ensuring that these are readily available to staff and that staff and stakeholders are familiar with them

- Ensure that they are aware of the current legislation relating to safeguarding and child protection
  - Maintain a clear and concise training record, ensuring that all relevant training is completed and up to date
  - Ensure that all staff and stakeholders are aware of this policy and related documentation
  - Provide or arrange appropriate safeguarding training for staff, ensuring that they have a clear understanding of their roles and responsibilities relating to this area and are confident that they know how to recognise, report and refer potential concerns as necessary
  - Support staff involved in reporting incidents of concern
  - Be responsible for coordinating action within the provision on safeguarding issues, including the proactive identification and management of early intervention and support
  - Liaise with staff on a 'need to know' basis so that students' rights to confidentiality are maintained, ensuring that they are promoting educational outcomes by sharing information about safeguarding and child protection issues with relevant staff and services
  - Represent the provision at child protection meetings and be a member of 'core groups' as required.
  - Call for multi-agency Best Interest/ Professionals meetings as appropriate
  - Liaise with external agencies such as the Local Authority, Social Services (child and adult), Police, Local Authority Designated Officers, Clinical Commissioning Groups and other agencies on individual cases of suspected or identified abuse (Derbyshire and Nottinghamshire referrals of concern should be made through the Children's/ Adult's Single Point of Access)
  - Act as the contact person within the provision for external agencies (this may be delegated to other members of the Safeguarding Team with the approval and supervision of the Designated Safeguarding Lead)
  - Be aware of students who have additional support needs or students who have allocated support from external agencies such as a social worker
  - Supervise the practice of the Safeguarding Team, ensuring that they have accessed appropriate and relevant training that it is in date
  - Work collaboratively and efficiently with external agencies
  - Keep clear, concise and accurate records relating to child protection and safeguarding concerns, including copies of any referrals and interventions from external agencies
- Members of the Phoenix ND Education Ltd Safeguarding Team have, and will continue to undertake, relevant training pertaining to the role.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are required to complete Level 3 and training which is updated every 2 years. This is in addition to regular updates and training that support them to fulfil their roles and responsibilities.

## All Staff

### Staff induction

Staff and directors will have an induction appropriate to their roles, which will include organisation vision/ethos, aspirations, and expectations of all staff, as well as what is considered acceptable and what is not. New staff will also receive information about systems within the school/college which support safeguarding, including online safety and copies of policies; this includes:

- Child protection/ safeguarding policy, which includes how the provision deals with child-on-child abuse
- Phoenix ND Education behaviour policy, which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Staff behaviour (code of conduct) policy, which includes acceptable use of technologies/mobile devices, online filtering and monitoring processes utilised and expectations associated with this, staff/learner relationship and communications, including the use of social media. The policy also incorporates low-level concerns, allegations against staff and whistleblowing
- The safeguarding response to children who are absent from education
- The safeguarding response to child-on-child abuse
- The role and names of the designated safeguarding lead, their deputy/ies, the designated teacher for looked after children, and the senior mental health lead.

All staff will:

- Receive a paper/electronic copy of, read and sign to say that they have received, read, and understood:
  - Those who work directly with children at least Part one of [Keeping Children Safe in Education: for school and college staff](#) and Annex B: Further information (July 2025)
  - Directors and designated safeguarding leads/deputies all of [Keeping Children Safe in Education](#) (July 2025)

All staff will:

- Be aware of:
  - The Stopping Domestic Abuse Together initiative (known nationally as Operation Encompass), a police-led early domestic abuse notification to schools
  - The safeguarding response to children who are absent from education
  - The safeguarding response to child-on-child abuse
  - The early help process for low level and emerging needs and understand their role in it

- o The process for making a referral to local authority children's social care, the statutory assessments that may follow this and the role they may play in such assessments
- Know what to do if a child tells them they are being abused, exploited, or neglected and will be able to reassure children they are being taken seriously, will be supported, and kept safe
- Know what to do if a child shares, produces, or receives a sexual communication, including sharing nudes/ semi-nudes
- Know what to do if a parent or carer shares any concerns about a child
- Be aware:
  - o Children may not feel ready or know how to tell and/or might not recognise their experiences as harmful and that certain children may face additional barriers to telling
  - o Any child may benefit from early help and be alert to the need for early help for some groups of children
  - o Of the indicators of abuse, exploitation, and neglect, understand that children can be at risk inside and outside of the provision, in their home, institutional or community setting and online
  - o Children can abuse other children, referred to as child-on-child abuse, and the policy to prevent and respond to it
  - o Children with special education needs or disabilities (SEND), particularly those with neurodevelopmental conditions such as autism, as well as those with certain medical or physical health conditions are particularly vulnerable to online and offline abuse, exploitation, and neglect - and also face additional barriers to the recognition of this abuse
  - o In addition to children with SEND, that some groups of children are potentially at greater risk of harm, including children who need a social worker, children absent or missing from education or who are electively home educated, children requiring mental health support, looked after/previously looked after children and children who are, or may be, lesbian, gay, bi, or trans (LGBTQ+)
  - o Technology is a significant component in many safeguarding and well-being issues
  - o Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
  - o That children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse
  - o Of the '*one chance*' rule with suspected or actual victims of forced marriage and so called 'honour-based' abuse. That is, they may only have one opportunity to speak to a victim or potential victim to offer appropriate support and advice

- Of the possible indicators, alongside other factors, and contexts, that a child is likely to be susceptible to an extremist ideology
  - Of the indicators which may signal children are at risk from, or involved with, serious violent crime
- Have the skills, knowledge and understanding to keep looked after children and previously looked after children safe
- Discuss/report any concerns they have about a child with the designated safeguarding lead or their deputy. If staff members are unsure, they should always speak to the designated safeguarding lead or their deputy
- Speak to the designated safeguarding lead or deputy about any concerns about so called 'honour-based' abuse, breast ironing, female genital mutilation (FGM)<sup>[1]</sup>, virginity testing and hymenoplasty<sup>[2]</sup>
- Work with the designated safeguarding lead and do everything they can to support social workers to help them carry out a statutory assessment
- Be mindful that early information sharing is vital to identifying and tackling all forms of abuse and neglect and in promoting children's welfare, including in relation to their educational outcomes

## **6. Phoenix ND Education Ltd Safeguarding - Providing a safe environment**

Phoenix ND Education Ltd works to safeguard children, young people, adults at risk and staff by:

- Ensuring the provision is designed to acknowledge the potential vulnerability of all of its students to be abused, particularly the additional vulnerability of students with special educational needs and disabilities (SEND).
- Ensuring that the provision is built on a foundation of supporting and equipping students with the relevant knowledge and skills to develop their independence skills, keep themselves safe and know how to ask help.
- Supporting students to be confident and have positive self-image and self-esteem, both through the delivery of educational lessons and the development of a culture that meets their emotional, social and mental health needs.
- Ensuring that staff are provided with the necessary training and skills to undertake their roles and responsibilities.

<sup>[1]</sup> There is a specific [legal duty](#) on teachers to report acts of FGM on girls under 18 to the police

<sup>[2]</sup> It is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK; see multi-agency [guidance](#) for more information

- Ensuring that staff understand, through regular training and updates, the need to be alert to mental health as a possible safeguarding concern. Mental health difficulties can, in some cases, be an indicator that an individual is suffering, or is at risk from abuse. It may also highlight individuals' needs that are not being met. It is important to note that staff are not expected to be trained to diagnose mental health difficulties or conditions, however they are best placed to notice behaviours that may be of concern and report them using the safeguarding or protection from harm procedure.
- Operating effective and proactive policies and procedures across all levels of the provision. This includes clear procedures for responding to and reporting allegations, concerns or disclosures relating to abuse. This also includes operating and safer recruitment processes which are in accordance with Keeping Children Safe in Education 2025.
- Listening and responding to students by acknowledging and valuing all forms of communication, including verbal, non-verbal, assistive and augmentative communication, and behaviour (including challenging behaviour).
- Ensuring that perceived boundaries of education and learning are challenged to support individuals to reach their potential. This includes providing learning experiences based on Spiritual, Moral, Social and Cultural (SMSC) values to foster environments based on mutual respect, tolerance, understanding and equality for all.
- Operating a comprehensive range of general and personalised individual student risk assessments, to ensure students are safe whilst accessing provisions or undertaking related activities. These are updated and reviewed regularly, in line with new safeguarding-related information. These are also readily available to staff who require them.
- Providing clear guidance surrounding the provision of in person and remote learning, in order to ensure that students who are unable to access education are supported appropriately and safeguarded.
- Ensuring that all staff are provided with Phoenix ND Education Ltd ID badges.

## **7. Recognition and protection of vulnerable groups**

Phoenix ND Education Ltd recognises that there are some individuals who are more susceptible and vulnerable to abuse. We specifically acknowledge that many individuals who access the provision are diagnosed with special educational needs or disabilities and therefore may be especially vulnerable to abuse. Phoenix ND Education Ltd ensures that all staff are provided with comprehensive training that gives them the tools, understanding and ability to recognise, respond to and report concerns at the earliest possible opportunities. We recognise that having an allocated social worker is an individuation of heightened risk for a child, young person or adults at risk. This may consequently mean that they are more vulnerable to further harm, as well as facing additional educational barriers to attendance,

learning and engagement. It may also mean that they are more vulnerable to experiencing difficulties with mental health and wellbeing.

Phoenix ND Education Ltd has also appointed a Designated Person (DP) for Children Looked After.

The named DP for Children Looked after is Lindsey Wills.

The Designated Person for Looked After Children works in collaboration with the Virtual School representatives, Local Authority and any other nominated professionals engaged with the child, young person or adult at risk. They also have responsibility for tracking and monitoring the attainment and progress of Children Looked After (CLA) and Children Previously Looked After (CPLA). This is to ensure that the provision effectively promotes the educational attainment, achievement and welfare of these specific groups and that where required, additional support and interventions are implemented to ensure that they fulfil their potential.

## **8. What staff should do if they have a safeguarding concern.**

### **Safeguarding and Protection from Harm – Recognising Abuse**

Abuse is a form of maltreatment of a child which may be caused by an adult, adults or by another child or children inflicting harm or by failing to prevent harm. The abuse can be physical, sexual, neglect or emotional, including witnessing the ill treatment of others, such as domestic abuse. Children can be at risk of abuse inside and outside of their home, in their community, inside and outside the school/college and online.

Safeguarding issues can put children at of risk harm. Behaviours linked to drug taking and or alcohol misuse, deliberate absence from or going missing from education, serious violence (including county lines), radicalisation, consensual/non-consensual sharing of nude and semi-nude images can be signs that children are at risk. Abuse, neglect, and safeguarding issues are rarely stand-alone events; in most cases multiple issues will overlap with one another.

Safeguarding action may be needed to protect children from the following risks, which include abuse perpetrated by other children as well as by adults:

- Any concerns that a child has suffered or is at risk of suffering physical abuse, sexual abuse, emotional abuse, or neglect
- Bullying, including online bullying and prejudice-based bullying, racist, disability and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls

- Sexual harassment, online sexual abuse, and sexual violence between children. Online abuse can include sending abusive, harassing, and misogynistic or misandrist messages; sharing nude and semi-nude images and videos; and coercing others to make and share sexual imagery
- Radicalisation and/or extremist behaviour
- Child sexual exploitation and child criminal exploitation, including county lines
- Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example youth produced sexual imagery
- Abuse within intimate personal relationships between children (sometimes known as 'teenage relationship' abuse)
- Upskirting<sup>1</sup>
- Substance misuse – drugs and alcohol
- Gang activity and serious violence, particularly affecting young males who have been excluded, have experienced trauma and have been involved in offending
- Domestic abuse
- Forced marriage, marriage/civil partnership under the age of 18, virginity testing or hymenoplasty, female genital mutilation and so-called 'honour-based' abuse
- Children with Perplexing Presentations (PP) in whom illness is fabricated or induced (FII)
- Homelessness
- Other issues not listed here but that pose a risk to children

Further information about indicators of abuse and neglect as well as safeguarding risks noted above are located in [Keeping Children Safe in Education](#) (June 2023).

### **Safeguarding and Protection from Harm – Responding to Abuse**

Key points to remember for any member of staff (including volunteers or supply staff) or visitors whenever they have any concerns about a child's welfare:

- In an emergency take the action necessary to help the child, for example, call 999
- Do not assume a colleague or another professional will take action and share information that might be critical to keeping a child safe. Early information sharing is vital in keeping children safe, whether this is when problems first emerge, or when a child is already known to local authority children's social care
- Report your concern, including any possible private fostering arrangements, to the designated safeguarding lead or their deputy as soon as you can and by the end of the day at the latest.
- If you are unsure speak to the designated safeguarding lead or their deputy

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<sup>1</sup> Upskirting is taking a picture of someone's genitals or buttocks under their clothing without them knowing, either for sexual gratification or in order to humiliate or distress the individual. This is a criminal offence, see Voyeurism (Offences) Act (2019)

- If the designated safeguarding lead or their deputy is not around, ensure the information is shared with the most senior person in the provision that day. The concerns and any action taken must then be shared with the designated safeguarding lead as soon as it is possible
- If the concerns are about sharing nudes and semi-nudes do not view, copy, print or share the images
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, or family
- As soon as you are able complete a record of the concerns. This should be on the same day and before the child is due to leave the school premises. Complete Appendix D – Safeguarding Concern Report
- Seek support for yourself if you are distressed

Staff must always **immediately** inform the designated safeguarding lead or their deputy if there are any:

- Concerns that a child is presenting signs or symptoms of abuse or neglect, including suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- Searching incidents where there are reasonable grounds to suspect a learner was in possession of a prohibited item<sup>[1]</sup> or where a search has revealed a safeguarding risk
- Behaviour or changes in presentation, including changes in attendance, which gives rise to suspicions that a child may not be receiving adequate care or may be suffering harm
- Hint or disclosure of abuse about or by a child
- Concerns that a person(s) who may pose a risk to children is living in a household with children present
- Concerns about online abuse including cybercrime, exploitation, harmful sexual behaviour, sharing nudes and semi nudes and/or where any adult appears to be sexually communicating (e.g., email, text, written note or verbally) with a child
- Concerns about child-on-child abuse, including sexual violence and harassment
- Information which indicates that the child is living with someone who does not have parental responsibility for them (this is known as private fostering)
- Concerns that a child is at risk of domestic abuse or so-called 'honour-based' abuse, including forced marriage, marriage or civil partnership under the age of 18, female genital mutilation (FGM), breast ironing, virginity testing or hymenoplasty
- Concerns that a child is at risk of radicalisation, child sexual exploitation or criminal exploitation, including county lines; or that a child or their parent/carer may be a victim of modern slavery (trafficked)

There will also be occasions when you suspect that a child may be at risk, but you have no 'real' evidence or that the child may need support with their mental health. The child's behaviour and or appearance may have changed, their attendance may have reduced, their

ability to concentrate and focus may have altered, or you may have noticed other behavioural and or physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

It is not the responsibility of Phoenix ND staff to determine the truth of any disclosure or allegation; this is the responsibility of local authority children's social care. All staff however have a duty to recognise where extra support is needed or where there are complex needs or child protection concerns requiring intensive or specialist support.

Ensure you record these early concerns using the Safeguarding Concern Form. If a child or adult does begin to reveal that a child is being harmed, you should follow the advice in the section '*If a child chooses to tell a member of staff about a concern or abuse*'.

**Remember: If you are unsure, you should always have a discussion with the designated safeguarding lead or their deputy**

#### **If a child chooses to tell a member of staff about a concern or abuse**

It takes a lot of courage for a child, parent, carer, or other significant adult to disclose that they are worried or have concerns. They may feel ashamed, the abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. It is important they are reassured that they are being taken seriously, and that they will be supported and kept safe. They should not be made to feel they are creating a problem, blamed or ashamed for making a report. Reports, particularly those about sexual violence and harassment, if possible, should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases.

If a child or adult talks to you about any risks to a child's safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement.

During your conversation with the child (or their parent/carer):

- Allow them to speak freely, listen to what is being said without interruption and without asking leading questions
- Keep questions to a minimum and of an open nature ('TED questions' tell me, explain, describe) i.e., 'can you tell me what happened?' rather than 'did x hit you?'
- Remain calm and do not overreact – the child (or their parent/carer) may stop talking if they feel they are upsetting you

- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- Avoid admonishing the child or adult for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but they may interpret it that they have done something wrong
- Do not be afraid of silences – remember how hard this must be for the child or adult
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what do other family members think about all this
- At an appropriate time tell the child or adult that to help them you must pass the information on
- Do not automatically offer any physical touch as comfort; it may be anything but comforting to a child who has been abused
- Tell the child or adult what will happen next. The child or adult may agree to go with you to see the designated safeguarding lead. Otherwise let them know that someone will come to see or contact them before the end of the day
- Report verbally to the designated safeguarding lead
- Write up your conversation as soon as possible and hand it to the designated safeguarding lead
- Children should not be asked to write statements about abuse or any concerns that may have happened to them or sign the staff record
- Seek support if you feel distressed. This may be sometime after the disclosure

Staff may become aware of abuse, or concerned that a child, young person or adult at risk may be at risk of abuse, through a variety of ways, including:

- Disclosures from a child, young person or adult at risk
- Disclosures from parents, family or legal guardians
- Disclosures from other professionals
- Disclosure from another person (friend/ neighbour/ taxi driver/ babysitter etc)
- Discovery of physical evidence of harm – such as bruises or marks on an individual’s body.

[\[1\]](#) Prohibited items include knives and weapons, alcohol, illegal drugs, stolen items, tobacco, cigarette papers, fireworks pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be used, to commit an offence, or to cause personal injury to, or damage to property of; any person (including the learner).

Particular attention should be paid to injuries that occur to both sides of the body, soft tissue or appear to have regular patterns.

Any untreated injuries and also injuries that have been delayed in presentation should also raise concerns and be reported without delay.

Any bruising found on a non-mobile baby, child, young person or adult at risk should be recorded as a safeguarding concern, IMMEDIATELY and in ALL cases.

Further to this, if there is any evidence to suggest that an individual has been subject to, or is at risk from, Female Genital Mutilation this must be IMMEDIATELY reported in ALL cases

- Unexplained changes in behaviour or personality
- Evidence of disturbance or explicit detail in drawing, writing or play (this is more prominent in younger children where they display age-inappropriate behaviours)
- Evidence of neglect – uncleanliness, poor personal hygiene, failure to thrive or apparent exposure to unnecessary risks

### **Safeguarding and Protection from Harm – Reporting and Recording Concerns**

Concerns about abuse can arise through a variety of ways and in a range of different settings. Whenever a member of Phoenix ND Education Ltd has concerns surrounding abuse, they must report this concern to the Designated Safeguarding Lead, or in their absence, a member of the Safeguarding Team, as soon as possible.

A confidential written report on the incident should be completed as soon as possible. This report must be made available as soon as possible to the Designated Safeguarding Lead. The person who observed the incident must make an accurate written report detailing their concerns on LearnTrek. This must be submitted to the Designated Safeguarding Lead who will make any necessary additional reports regarding actions taken and decisions made relating to the concern. The Designated Safeguarding Lead will be responsible for ensuring that the Phoenix ND Education Ltd Director is informed of all allegations or suspicions of abuse.

Phoenix ND Education Ltd has a responsibility to share allegations, concerns or disclosures of abuse with relevant external agencies in the best interests of the child. The Designated Safeguarding Lead and Safeguarding Team will consult as to whether, following an investigation into the concern, it is appropriate to refer the concern to the local Safeguarding Board. This would allow them to consider what, if any, further action should be taken. All decisions relating to safeguarding concerns and referrals will be documented, regardless of their outcome, in the student's Safeguarding File.

In Derbyshire and Nottinghamshire, all referrals are made through the Safeguarding Boards. If the student resides in another area the referral should be made to that Local Authority Safeguarding board. Social Services must be contacted about any allegations or suspicions of abuse. This will usually be done by the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads in the absence of the DSL. When contacting Social Services (or any other

relevant external agencies, such as the police) the details of this communication and contact will be recorded. Following any necessary referrals to external agencies for support, Phoenix ND Education Ltd will stay closely involved and check with the appropriate authorities that action is being appropriately taken to support the individual.

All records relating to student safeguarding or welfare concerns will be retained in the student's individual Safeguarding File. This file will be held separately to the student's main file. Safeguarding files will be stored in secure fashion and are only accessible to the Designated Safeguarding Team. They will clearly be marked as "confidential". Relevant staff will be made aware when a student is subject to support from Social Services. This is to ensure that staff can effectively support the student and be vigilant surrounding any emerging concerns. Records relating to the student's welfare will remain on the student's file as long as the individual continues to be supported by Phoenix ND Education Ltd as a provision.

When a student ceases being supported by Phoenix ND Education Ltd, other providers will be advised in writing that the organisation's records contain information about child protection/ safeguarding concerns, even where these may no longer be current. Files will be transferred to the new placement or provision in line with GDPR and Data Protection rules and regulations.

### **Prevent Duty**

Phoenix ND Education Ltd also recognises and adheres fully to the Prevent Duty (2015). This places a duty on educational provisions to have due regard to the need to prevent individuals from being drawn in terrorism. Radicalisation (the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind) and extremism (the holding of extreme political or religious views) are increasingly recognised as serious threats to the safety and wellbeing of children, young people, adults at risk and families.

Phoenix ND Education Ltd are aware that children and young people with SEND may be more vulnerable to extremism and radicalisation. To that end, we are committed to safeguarding students from radicalism and extremism.

Safeguards in place include:

- All staff have an understanding of their roles and responsibilities in regard to the Prevent Duty and Channel process
- All staff are aware of what radicalisation is and why we need to be vigilant in organisation
- All staff know how to identify any possible concerns e.g. changes in students' behaviour which could indicate a need for help or protection; and how to report any concerns to the DSL so that further safeguarding action (including a Prevent referral) can be taken if necessary

- All students, parents/carers and families know that Phoenix ND Education Ltd has policies in place to keep students safe from harm and that these policies, procedures and systems are regularly reviewed to ensure they are appropriate and effective
- Phoenix ND Education Ltd ensures that its provision actively promotes the understanding of British values including democracy and the rule of law, as well as supporting our students to develop good self-esteem and positive relationships with peers and other members of their communities.

### **Where a criminal offence is suspected**

Wherever a criminal offence is alleged or is suspected to have taken place, Phoenix ND Education Ltd has a responsibility to share this information and report it to the police, social care and Local Authority Designated Officer (where it pertains to a member of staff).

### **Contact with the family**

Phoenix ND Education Ltd prides itself on the relationships it develops with parents, carers and families when working with their children, young people or adults at risk. However, it is important to understand then, when managing potential concerns relating to abuse, that Phoenix ND Education Ltd has a statutory responsibility to ensure that all actions taken are in the best interests of the child. Following concerns being raised, contact or communication with the family of the student should be discussed with the Designated Safeguarding Lead. Communication and or consent will be sought from families, in all instances where it is deemed appropriate and safe to do so, in advance of a referral being made. The exception to this is incidents of concern where there is a suspicion that in doing so, it may increase the risk to the individual. Where there is a concern that this is the case, a referral will be made by the Designated Safeguarding Lead and advice will be sought from appropriate services regarding whether it is appropriate to share concerns.

In cases where a minor physical injury causes concern, it may be appropriate to discuss this with the parent or carer. If the explanations suggest a non-accidental cause for the injury, failure to protect the individual from known risks, or it appears inconsistent with the injury sustained, the concern will be forwarded immediately to the appropriate Social Services.

In cases where there are suspicions of sexual abuse the Designated Safeguarding Lead will always seek immediate advice and support from Social Services before discussing the matter with the family.

### **Child Protection Plans**

Phoenix ND Education Ltd will be informed by the relevant Social Services department where a student is subject to a Child Protection Plan. The name of the identified social worker will be clearly indicated on the student's record. Other relevant documentation will be stored on the individual's Safeguarding File. Phoenix ND Education Ltd is committed to working collaboratively with external agencies and will participate fully in the work of the core group, to assist with the objectives of the Child Protection Plan. When a student is on a

Child Protection Plan Phoenix ND Education Ltd will report all absences, behaviour changes or other concerns without delay to the allocated Social Worker. As with all student's safeguarding files, where a student leaves Phoenix ND Education Ltd provision all safeguarding information will be transferred to the new placement.

### **Requests for assistance by external agencies**

Phoenix ND Education Ltd has a duty to assist Social Services or the Police when they are making enquiries about the welfare of individuals. Requests for information must be provided in writing, addressed to the Designated Safeguarding Lead. Information must not be provided unless authorised by the Designated Safeguarding Lead. If a staff member receives a request for information, they must forward it immediately, without delay, to the Designated Safeguarding Lead for the request to be confirmed and actioned. Requests for attendance to meetings surrounding individual students received by staff (for example Child Protection conferences or reviews) should be redirected to the Designated Safeguarding Lead. The DSL will arrange preparation of a report, where appropriate, in consultation with relevant staff. The Designated Safeguarding Lead, or a member of the Safeguarding Team, will attend the meeting. Requested reports should contain information relating to the student.

Below is an example of the information that should be included within a report:

- Student Name
- Student Date of Birth
- Date of Admission
- Observations of – Academic Progress/ Attendance/ Behaviour/ Relationships with peers and adults/ Areas of strength/ Identified protective factors/ Family dynamics/ Consider contextual safeguarding/ Current targets or Goals Reports should be objective, and should clearly distinguish between facts, observations, allegations and opinions.

It is important to note that these reports (and any other reports or records relating to safeguarding and child protection) will be shared amongst relevant professionals and could be used in legal proceedings as evidence.

## **9. Managing Allegations of Abuse Against Staff**

Phoenix ND Education Ltd ensures that all staff are adequately trained to undertake their roles and responsibilities. Phoenix ND Education Ltd will always take appropriate action following any reports or concerns that relate to the safeguarding of children, young people and adults at risks. Phoenix ND Education Ltd will always follow statutory procedures, in line with the relevant Local Safeguarding Children's Boards, if an allegation of abuse is made against a member of staff.

Where allegations are made against a member of staff, information should be shared directly with the Designated Safeguarding Lead. The Designated Safeguarding Lead will liaise with the Director of Phoenix ND Education Ltd. Where the concern is related to the Designated Safeguarding Lead, the concern should be forwarded directly to the Director of Phoenix ND Education Ltd. If a concern relates to the Directors of Phoenix ND Education Ltd, the individual should consult directly with the Local Authority Designated Officer (LADO). The member of staff receiving the allegation, or observing incidents of concern, must not communicate this to any other staff.

Confidentiality is essential and information about an allegation must be restricted to those who need to know in order to ensure the:

- Protection children/adults at risks
- Relevant and necessary enquiries are able to be undertaken without compromise
- Avoidance of victimisation
- Safeguarding of the rights of the person about whom the allegation has been made and others who may be affected
- Management of disciplinary/complaints aspects are not compromised It is important to note that, although concerns may relate to an individual student, other students may also be at risk. As such, concerns must be taken seriously and acted upon without delay.

The Designated Safeguarding Lead, or nominated Director of Phoenix ND Education Ltd, must make a referral to the Local Authority Designated Officer (LADO), if the concern is that a member of staff has:

- Behaved in a way that has harmed a child/ adult at risk or may have harmed a child/ young person or adults at risk
- Possibly committed a criminal related offence against or related to a child/ adult at risk
- Behaved towards a child/ adult at risk in a way that indicated that they may pose a risk of harm to children/adults at risks; or
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children/ adults at risks.

A referral to the Local Authority Designated Officer must be made within 1 working day of the concerns being raised. Where a member of staff feels unable to raise concerns about

workplace malpractice, the staff member should refer to the Phoenix ND Education Ltd Whistleblowing Policy to raise their concerns. Alternatively, they can contact the NSPCC Whistleblowing Advice Line (call 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)). Individual members of staff can also contact the Local Authority Designated Officer themselves to refer concerns, if they feel it is appropriate.

### **Informing the subject of an allegation**

Phoenix ND Education Ltd Directors or the Designated Safeguarding Lead should inform the accused person about the allegation as soon as possible. However, this must first have been authorised by the Local Authority Designated Officer.

The subject of the allegations (whether suspended or not) shall be:

- Advised to contact their trade union or professional association to seek legal advice and support
- Treated fairly and honestly
- Supported to understand the concerns expressed, processes involved and possible outcomes
- Be kept informed of the progress of the investigation and case
- Be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes
- Be provided with support as appropriate

### **Suspension**

Consideration must be given as to whether it is necessary to remove the subject of the allegations from contact with students pending investigation and procedures arising from the allegation.

Suspension should not be automatic. It should be considered if any of the following applies:

- There is a cause to suspect a student is at risk of significant harm
- The allegation warrants investigation by the police or another external agency
- The allegation is so serious that there may be grounds for dismissal.

The decision that suspension is necessary should be made in consultation with the Local Authority Designated Officer. It will take into account the safety of the individuals involved and the impact of any enquiry. Written confirmation of suspension will be provided. The letter should be dispatched within 24 hours detailing the reasons for suspension. The individual should be informed who their named contact is within the organisation who can provide support during this time.

### **Further Action**

Phoenix ND Education Ltd can only undertake an investigation into allegations of abuse against staff in situations where the Local Authority Designated Officer has considered the case and indicated that it is appropriate to do an internal investigation.

Where internal investigations are directed by the Local Authority Designated Officer it is necessary for all actions to be documented in full. Once the investigation has been concluded and an outcome has been reached, a summary report must be provided to the Local Authority Designated Officer. Copies of these reports should also be held on the staff member's personnel file.

Phoenix ND Education Ltd will abide by the legal duty outlines in Keeping Children Safe in Education (July 2025) to refer to the DBS anyone who has harmed, or poses a risk of harm, to children or adults at risk where;

- The harm test is satisfied in respect of that individual (this will be decided by the Local Authority Designated Officer)
- The individual has received a caution or conviction for the relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- The individual has been removed from working (paid or unpaid) in regulated activity or would have had they not left Data Protection.

## 10. The Seven Golden Rules to Information Sharing

1. Remember that the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the UK GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

*Taken from [Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers \(2018\)](#) HM Government*

## 11. Safer Recruitment and Staff Training

### Safer Recruitment of Staff

Phoenix ND Education Ltd uses best practice and has adopted robust recruitment procedures as outlined in [Keeping Children Safe in Education](#) (July 2025) to deter and prevent people who are not suitable to work with children from applying, securing employment or volunteering opportunities in the provision. We apply all appropriate measures for our staff, including volunteers, agency and third-party staff (supply staff) trainees/student teachers, directors, and contractors. This forms a vital part of the whole provision approach to safeguarding and is an essential part of creating a safe environment for our learners.

Those involved with the recruitment and employment of our staff have received appropriate safer recruitment training and at least one person who conducts an interview has completed safer recruitment training.

Safer practice in recruitment means thinking about and including issues to do with child protection and safeguarding children at every stage of the process from advertising, job descriptions/person specifications, application forms, shortlisting, employment history and references, selection and pre-appointment vetting checks.

Everyone who works in the provision including volunteers and directors will have appropriate Disclosure and Barring (DBS) and teacher status, teacher and teacher prohibition checks or where appropriate GTCE sanctions and restrictions.

Other checks that may be necessary for staff, volunteers, and others:

- **Individuals who have lived or worked outside the UK** – will undergo the same checks as all other staff in the provision and further checks deemed appropriate to ensure suitability
- **Agency and third-party staff (supply staff)** - the provision will obtain written notification from any agency or third party organisation provider that they have carried out checks on an individual who will be working at the provision that we would otherwise perform.
- **Contractors** - where the provision uses contractors to provide services the contract will set out their safeguarding requirements.
- **Trainee/ student teachers** – applicants salaried by the provision will undergo all necessary checks by the Phoenix ND Education Ltd. The initial teacher training provider will carry out necessary checks on fee funded trainee teachers and will

provide written confirmation that these have been carried out and judged suitable to work with children.

- **Volunteers** - Phoenix ND Education Ltd will ensure volunteers are appropriately supervised as outlined in [statutory guidance](#) on supervising the activities of workers and volunteers with children. In addition, risk assessments will be undertaken, and professional judgment/ experience used when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaged in regulated activity. The details of the risk assessment will be recorded.

Phoenix ND Education Ltd maintains a single central record of pre-appointment checks consistent with [Keeping Children Safe in Education](#) (July 2025).

See the recruitment and selection policy/disclosure and barring (DBS) policy and supervision of volunteer's statement.

### **Visitors**

The provision premises provide a safe learning environment with secure access. We recognise there are different types of visitors, those in a professional capacity, children's relatives or others visiting for activities or visitors via a third party and have processes in place to ensure they are suitable, are checked and monitored as appropriate.

We recognise the importance of allowing access for local authority children's social care to conduct, or to consider whether to conduct an assessment and that staff from other partner agencies may need to visit to see a child or young person to either safeguard or promote their welfare. See Phoenix ND Education Ltd's security and visitor's policy.

### **External speakers/visitors**

We may ask external speakers or visitors to work with children or provide talks on subjects such as online safety, relationships/relationships and sex education and health education. On these occasions there will be an assessment of the educational value, the age appropriateness of what is going to be delivered and whether relevant checks will be required, and an assessment made of what will be appropriate supervision. There will also be an agreement made in advance of the session/s on how a safeguarding report should be dealt with by an external visitor. See Phoenix ND Education Ltd's policy for visiting speakers.

### **Staff Training**

In addition to the safeguarding training at induction, all staff will receive safeguarding training appropriate to their roles and responsibilities which is regularly updated, as well as Prevent Duty, child-on-child abuse and online safety training (which includes effective responses to sharing nudes/semi-nudes and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), so they are

equipped with the knowledge and skills to keep children safe. They will also receive regular safeguarding and child protection (including online safety) updates at least annually to help provide them with an awareness of safeguarding issues that can put children at the risk of harm ensuring they have the relevant skills and knowledge to safeguard children effectively.

All staff will receive training on attendance, with dedicated attendance training for any staff with a specified attendance function in their role, including administrative, pastoral or family support staff, and senior leaders.

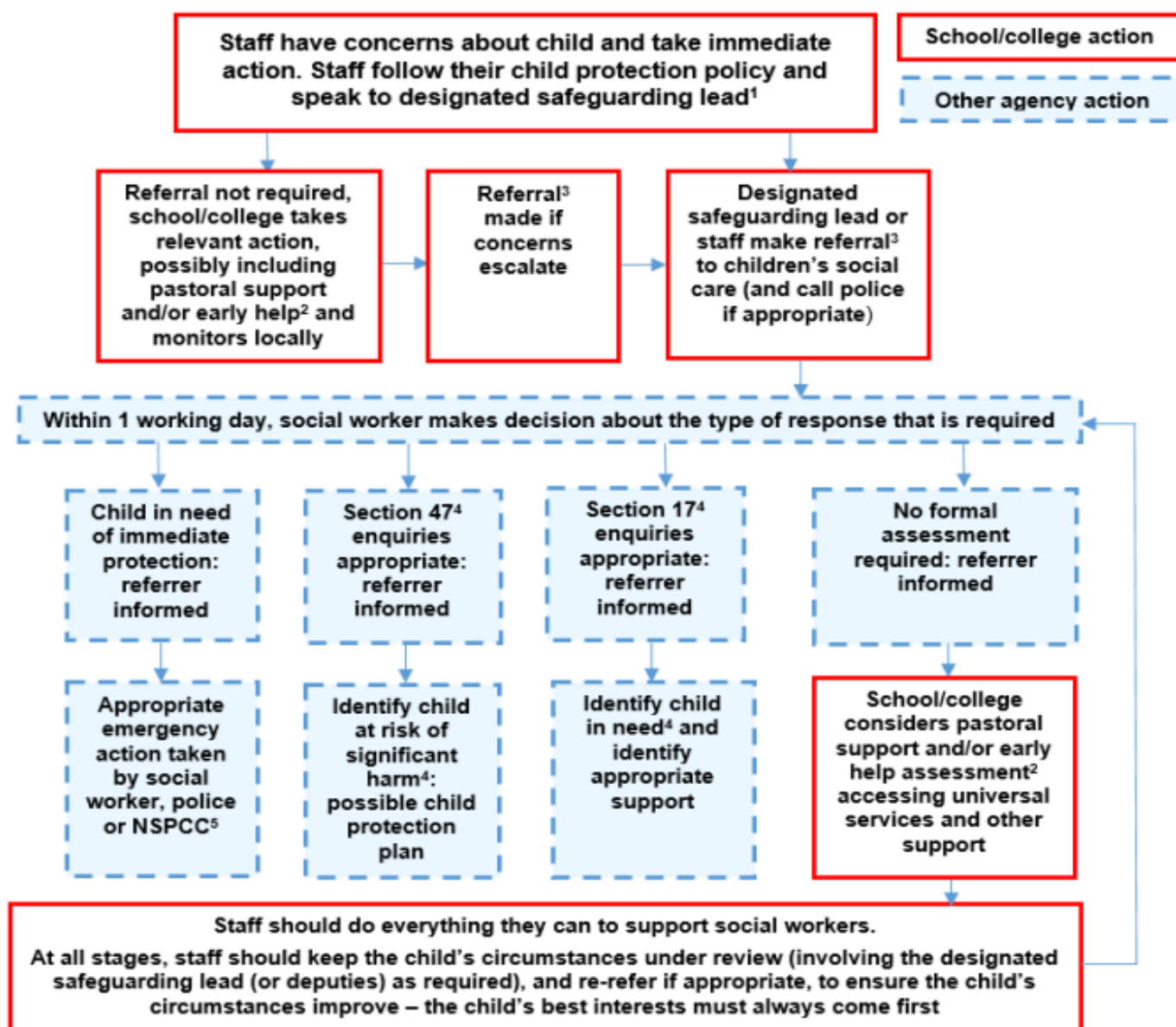
Those involved with the recruitment and employment of staff to work with children will have received appropriate safer recruitment training.

All staff must read and sign the latest version of the Department of Education's statutory guidance "Keeping Children Safe in Education" (July 2025).

Additional training is provided where required or where information, best practice, guidance or legislation pertaining to these topics is updated. Upon induction (or upon the review of an essential policy or procedure) staff are required to read all safeguarding related policies and procedures and to sign and date a central record confirming that they have read these and understand their roles and responsibilities. In addition to the training provided, staff are able to seek ongoing support, advice and guidance from the Designated Safeguarding Lead or Safeguarding Team regarding safeguarding and child protection.

A record of all training and CPD is maintained by the DSL.

## Appendix A – Safeguarding Flowchart



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

Taken from [Keeping Children Safe in Education](#) (July 2025), DfE, page 22

## Appendix B

### Further Types of Abuse

Child protection concerns are rarely standalone events that can be covered by one category or definition. In most cases, multiple issues will overlap with one another. For example, a child that is being sexually exploited will experience not only sexual abuse but also physical and emotional abuse.

Below are some further types of abuse and specific safeguarding issues.

#### Child exploitation (CE)

Refers to a child or young person being used for someone else's gain. Child exploitation is a form of abuse which can involve sexual, abusive or manipulative behaviour. It normally occurs because of an 'imbalance of power', such as age, physical strength, gender, cognitive ability or access to resources such as food, clothes and a place to stay. There is no single offence of child exploitation, but perpetrators face being investigated for more than one offence, including rape, trafficking, organised gang activity, sexual assault or inciting a child into sexual activity. Child exploitation occurs online and offline, by a group or individual and affects both males and females.

#### Child Sexual Exploitation (CSE Working together, February 2017)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person (male or female) under the age of 18 [including 16- and 17-year-olds who can legally consent to have sex] into sexual activity. It 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 occur over time or be a one-off occurrence and 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. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

There are three main types of child sexual exploitation:

**Usually involves just one abuser who has inappropriate power:** - physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

**Boyfriend:** Abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

**Organised exploitation and trafficking:** Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used

to recruit new victims. This serious organised activity can involve the buying and selling of young people.

### **Signs and Symptoms**

CCE indicators can also be indicators of CSE, as can:

- Going missing for periods of time or regularly coming home late
- Regularly missing NT&AS or education or not taking part in education
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse
- Displaying inappropriate sexualised behaviour

### **Child criminal exploitation (CCE)**

Describes all crime in which an individual is coerced to commit an offence for the benefit of an individual or group who holds more power than they do. Coercion through power can take many forms. The term county lines refers to where children are groomed and coerced into trafficking drugs and money by criminal gangs from major cities who network around the country. County lines is a form of criminal exploitation.

### **Extremism/Radicalisation**

Refers to the process by which a person comes to support forms of extremism and terrorism.

Radicalisation can happen in many different ways and settings. Many factors can contribute to a child or young person's vulnerability, including their background, family, friends or online contacts.

An extremist or terrorist group may also appear to provide an answer to a child's unmet needs. Staff have a responsibility to report any concerns regarding radicalisation and extremism of children and young people to the Designated Safeguarding Lead.

### **Child trafficking and modern-day slavery.**

Children can be trafficked into, within and out of the UK. Children are trafficked for many reasons including: sexual exploitation, domestic servitude, labour, benefit fraud, theft, working in cannabis farms and work in the sex industry.

### **Fabricated or induced illness**

Fabricated or induced illness (FII, also known as Munchausen's syndrome by proxy) This is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in a child. According to the NHS, fabricated or induced illness can involve children of all ages, but the most severe cases are usually associated with children under five years.

### **Breast ironing/flattening**

Breast Ironing is where young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. The custom uses large stones, a hammer or spatulas that have

been heated over scorching coals to compress the breast tissue, or an elastic belt to press the breasts so as to prevent them from growing in girls as young as 9 years old. Much like Female Genital Mutilation (FGM), breast-ironing has been identified by the UN as one of five under-reported crimes relating to female-to-female/gender-based violence. The practice is performed usually by mothers and female relatives and it is believed that by carrying out this act:

- Young girls will be protected from harassment, rape, abduction
- It will prevent early pregnancy that would tarnish the family name
- It will allow the girl to pursue education rather than be forced into early marriage
- It will delay pregnancy by “removing” signs of puberty
- Girls may not appear sexually attractive to men

Most at risk: Young pubescent girls usually aged between 9 – 15 years old. It is a well-kept secret between the young girl and her female relatives who are likely to carry out the practice.

### **Extra Familial Harm**

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation

### **Peer-on-peer/ child- on-child abuse**

Phoenix ND Education recognises that children may abuse their peers physically, sexually, and emotionally. There is a zero-tolerance approach to child-on-child abuse; abuse is abuse and this will not be tolerated or passed off as ‘banter’, ‘just having a laugh’, ‘boys being boys’ or ‘part of growing up’ as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

- [Keeping Children Safe in Education](#) (June 2023) defines child-on-child abuse as most likely to include but not limited to:
  - Bullying (including cyberbullying, prejudice based and discriminatory bullying)
  - Abuse within 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 online element which facilitates, threatens and /or encourages physical abuse)
  - Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and /or encourages sexual violence)
  - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
  - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - Consensual and non-consensual sharing of nudes and semi-nude images and or videos

- Upskirting<sup>2</sup>, 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
  - Initiating/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)
- It can also include causing someone to engage in extremist or radicalising behaviour
- Child-on-child abuse exists on a continuum and different forms of abuse may overlap
- It can affect any child/young person of any age and sex and can occur between two children or through a group of children abusing a single child or group of children
- Sometimes vulnerable children are targeted. For example:
  - Those living with domestic abuse or with intra-familial abuse in their histories
  - Young people in care
  - Those who have experienced bereavement through the loss of a parent, sibling, or friend
  - Black and minority ethnic children are under identified as victims but are over identified as perpetrators
  - There is recognition it is more likely that girls will be victims and boys are likely to be perpetrators. However, both girls and boys can experience child-on-child abuse, but they are likely to experience it differently e.g. girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing (rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group)
  - Evidence also shows that children with SEND, and LGBTQ+ children are at greater risk
- It is influenced by the nature of the environments in which children/young people spend their time - home, school/college, peer group, online and community - and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, social marginalisation etc, can all be used to exert power over a peer
- Child-on-child abuse involves someone who abuses a 'vulnerability' or power imbalance to harm another and has the opportunity or is in an environment where this is possible
- While perpetrators of child-on-child abuse pose a risk to others, they are often victims of abuse themselves

### **Sexual violence and harassment**

This can occur face-to-face, online, physically or verbally. It should not be seen as 'banter', 'part of growing up' or 'just having a laugh'.

**'Upskirting'** is a form of sexual harassment. It normally involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks. 'Upskirting' often occurs in a crowded, public place, making it hard for the victim to know that a photograph is being taken. 'Upskirting' is a criminal offence.

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<sup>2</sup> The Voyeurism (Offences) Act (2019) – upskirting is a criminal offence and anyone of any gender can be a victim

### **Female genital mutilation (FGM)**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. It typically takes place between birth and around 15 years old, but The World Health Organisation identifies girls between 6 and 10 as being most at risk.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Unless there are exceptional circumstances, concerns about FGM should be taken to the Designated Safeguarding Lead, rather than the police. A MASH referral would also be made. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them so sensitivity should always be shown when approaching the subject.

### **Signs, Symptoms and indicators**

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

*Indications that FGM may have already taken place may include:*

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absences from education, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear
- Talking about pain or discomfort between the legs