

Child Protection and Safeguarding Policy (including safer recruitment, allegations against staff and low-level concerns)

Document control table	
Title	Child Protection and Safeguarding Policy
Date approved	4 th March 2024
Approved by	Inspire 2 Ignite Board of Directors
Date of next review	February 2025 (unless legislation updates are required earlier)
Updates/revisions included:	This document is newly established as part of Inspire 2 Ignite's strategic shift to directly collaborate with schools as an Alternative Provision Provider through local authority partnerships. The policy has been developed to ensure our safeguarding practices align with our expanded role and responsibilities, reflecting our commitment to the highest standards of safety and welfare for all individuals we work with. This approach allows us to meet the stringent requirements of an approved Alternative Provision Provider and underscores our dedication to maintaining a safe and supportive environment for our beneficiaries.

This policy has been drafted to reflect the principles and guidelines set out in "Keeping Children Safe in Education (KCSIE) 2023" (<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>), underscoring our commitment to safeguarding and child protection. While Inspire 2 Ignite operates as an unregistered Alternative Provision Provider, we recognise the importance of adhering to nationally recognised safeguarding standards to ensure the utmost safety and wellbeing of all individuals within our care.

We require all staff, directors and volunteers to thoroughly read and understand this policy in conjunction with Part 1 and Annex B of KCSIE. This is to ensure a deep and comprehensive understanding of safeguarding practices as applicable to our operations.

Should there be any queries or need for clarification, we encourage direct communication with the designated safeguarding lead (DSL) within our organisation.

We are supported by Olive Academies on our Safeguarding responsibilities and Quality Assurance.

When a participant has been referred to us from a school we will agree with the school how safeguarding concerns and/or incidents should be handled between the parties to ensure the safety and wellbeing of the child involved and ensuring that appropriate action is taken.

KEY CONTACTS

Role	Name	Contact details
Designated Safeguarding Lead	Christine Griffey (Director)	Christine@inspire2ignite.co.uk
Deputy Designated Safeguarding Lead	Sam Squire (CEO)	Sam@inspire2ignite.co.uk
External Safeguarding Lead and Quality Assurance	Fran Hobbs	Frances.Hobbs@oliveacademies.org.uk
Cambridgeshire Local Authority Designated Officer (LADO)		LADO@Cambridgeshire.gov.uk
Bedford Borough Local Authority Designated Officer (LADO)		LADO@Bedford.gov.uk
Referrals into Early Help and Social Care	Cambridgeshire Children's Service Centre	0345 045 5203

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1. Introduction

As an organisation committed to excellence, we recognise the paramount importance of safeguarding the welfare of all children, young people, and adults at risk who come into contact with our services. This policy serves as a cornerstone of our commitment to create a safe, respectful, and nurturing environment where every individual is protected from harm and enabled to thrive.

Inspire 2 Ignite is a community and all those directly connected, staff members, board members, parents, families and the young people we work with, have an essential role to play in establishing a safe and secure environment for all of the activities we deliver. This policy is designed to be inclusive, covering all aspects of our operations, from direct programme activities to online interactions and community engagements. It establishes clear expectations for behaviour, provides guidance for recognising and responding to concerns of abuse or neglect, and outlines the procedures for reporting and managing safeguarding incidents.

This document is the result of a collaborative effort among our staff and partners. It has been developed to ensure that everyone within the Inspire 2 Ignite community understands their role and responsibilities in safeguarding, emphasising a culture of vigilance and support.

We require that all members of staff including volunteers and contractors familiarise themselves with this policy, integrating its principles into their daily interactions and activities. Our collective adherence to these guidelines ensures that Inspire 2 Ignite not only provides a secure environment for learning and growth but also champions the rights and wellbeing of the children and adults we serve.

This policy is subject to regular review and updates, ensuring our safeguarding measures remain effective and reflective of the latest best practices.

We pledge to uphold the highest standards of safeguarding, making Inspire 2 Ignite a beacon of safety, respect, and empowerment for all.

2. Our ethos and aims

At Inspire 2 Ignite, we are dedicated to fostering an environment that transcends traditional learning boundaries, focusing on the holistic development of young people. We understand that every child's journey is unique, and our approach is rooted in creating a space where young individuals feel truly understood and heard. We believe in the power of personal development and facilitated learning, where educational experiences are tailored to individual needs, aspirations, and circumstances.

Our ethos is built on the pillars of safety, respect, and empowerment. We strive to provide a secure environment that encourages participants to explore, grow, and flourish both academically and personally. By emphasising active listening and empathy, we create a supportive atmosphere where young people can express themselves freely and confidently.

Our Aims:

- **Foster a safe and supportive environment:** Guarantee a secure, inclusive, and nurturing environment prioritising the wellbeing and personal growth of every young person in our care.
- **Ensure timely action for children's welfare:** Take appropriate and timely action to safeguard and promote the welfare of participants, ensuring a rapid and effective response to any concerns.

- **Promote personal development and facilitated learning:** Facilitate holistic growth through personalised pathways, catering to individual strengths, interests, and needs.
- **Empower through training:** Ensure all staff are aware of their statutory responsibilities with respect to safeguarding, fostering an environment where safeguarding is everyone's priority. Commit to comprehensive training for staff in recognising and reporting safeguarding issues, ensuring they are equipped to act in the best interest of every child.
- **Collaborate with schools, parents, and carers:** Work in partnership with schools, parents, and carers, building an understanding of collective responsibilities towards the welfare of all children, including making necessary referrals to support their broader needs.
- **Champion the voices of young people:** Prioritise the voices and experiences of young people, ensuring they feel heard, valued, and empowered to influence their educational journeys.
- **Build bridges to the future:** Equip young people with the necessary skills, knowledge, and confidence to navigate their futures, fostering resilience and adaptability.
- **Cultivate a community of respect and understanding:** Create a culture that celebrates diversity, promotes mutual respect, and fosters understanding, preparing our learners to be compassionate, informed citizens.

Inspire 2 Ignite is committed to making a meaningful difference in the lives of young people by adhering to these aims. Our ultimate goal is to inspire our participants to believe in their potential and achieve greatness, fostering a community where every individual can thrive.

3. Legislation and statutory guidance

Inspire 2 Ignite is committed to upholding the highest standards of safeguarding in line with national legislation and statutory guidance relevant to the protection and welfare of children and young people. This includes:

- [The Children Act 1989](#) (and [2004 amendment](#)) which provide the legal framework for the protection of children in England.
- [Keeping Children Safe in Education \(KCSIE\)](#) which outlines the statutory guidance for schools and colleges on safeguarding children and safer recruitment.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Working Together To Safeguard Children](#) which sets out how organisations and individuals should work together to safeguard and promote the welfare of children.
- [The Prevent Duty](#) which explains the duty of education providers on preventing people from being drawn into terrorism.
- [The Education Act 2002](#) which sets out the responsibilities of Local Education Authorities, governing bodies, head teachers, and all those working in schools to ensure children are safe and free from harm.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).

This policy and the accompanying procedure have been developed in accordance with statutory guidance and local safeguarding procedures in each local authority we operate in.

Inspire 2 Ignite also follows: ‘Guidance for safer working practice for those working with children and young people in education settings’: <https://saferrecruitmentconsortium.org/>

4. Definitions

Safeguarding and promoting the welfare of children means:

- protecting children from maltreatment
- preventing impairment of children’s mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- and taking action to enable all children to have the best outcomes.

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix B explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

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

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

use on a case-by-case basis.

5. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs (SEN) or disabilities or health conditions
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are missing from education
- and whose parent/carer has expressed an intention to remove them from school to be home educated.

6. Roles and responsibilities

Inspire 2 Ignite is committed to creating a safe, inclusive environment where every child and young person is respected, valued, and protected. Below are the roles and responsibilities that underpin our safeguarding policy:

6.1. All Staff

- Must read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Will sign a declaration at the beginning of each academic year to say that they have reviewed and understood the guidance.
- Will reinforce the importance of online safety when communicating with parents and caregivers. This includes making them aware of what we ask participants to do online.
- Will provide a safe space for participants who are LGBT to speak out and share their concerns.
- Have a duty to ensure the welfare of children and young people, recognising and responding to any concerns about their safety and wellbeing.
- Are responsible for maintaining an environment that is safe and free from discrimination for all participants.
- Must be vigilant in observing signs of abuse or neglect and report any concerns to the Designated Safeguarding Lead without delay.

- Are required to undergo regular safeguarding training to recognise and report safeguarding issues effectively.
- Will be aware of our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead and deputies, the behaviour policy, and the online safety policy as well as the safeguarding response to children who go missing from education.
- Will be aware of the early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- Will be aware of the process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- Will be aware of what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Will be aware of the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- Will be aware of the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- Will be aware of the fact that children can be at risk of harm inside and outside of their home, at school, and online.
- Will be aware of the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- Will be aware of what to look for to identify children who need help or protection

Section 16 and Appendix D of this policy outline in more detail how staff are trained and supported to do this.

6.2. The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Details of our DSL and Deputy DSL are provided at the beginning of this policy - photos and contacts details are clearly displayed on our safeguarding posters at our premises. The DSL takes lead responsibility for child protection and wider safeguarding within the organisation. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours they can be contacted using the email address indicated on the front of the policy. When the DSL is absent, the deputy DSL will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care,

- Channel programme, Disclosure and Barring Service, and/or police, and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour.

The DSL will also:

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

The full responsibilities of the DSL and DDSLs are set out in their job description available in Appendix A.

6.3. The Inspire 2 Ignite Board of Directors is ultimately accountable for ensuring the safety of the children and young people it serves. They will:

- Facilitate a community approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the staff members to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty)
- Make sure:
 - a) The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - b) Online safety is a running and interrelated theme within the community approach to safeguarding and related policies
 - c) The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
 - d) There are procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix D of this policy covers this procedure
 - e) That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities:
 - a) Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - b) Make sure there are arrangements for the body to liaise with I2I about safeguarding arrangements, where appropriate

- c) Make sure that safeguarding requirements are a condition of using the premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Further information can be found in the guidance [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings](#)

6.4. The **case manager for dealing with allegations** of abuse made against staff members is the Designated Safeguarding Lead. The case manager for dealing with allegations against the DSL is the Deputy Safeguarding Lead. The procedure for managing allegations is detailed in Appendix D.

6.5. The **CEO** is responsible for the implementation of this policy within the organisation, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - a) Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - b) Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins a programme and via the website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the ‘case manager’ in the event of an allegation of abuse made against the designated safeguarding lead, where appropriate (see appendix D)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

6.6. **All staff members, volunteers and external providers** should know how to recognise signs and symptoms of abuse, how to respond to Participants who disclose abuse and what to do if they are concerned about a child.

7. Confidentiality and consent

We recognise that all matters relating to child protection are confidential. It is also essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

The CEO or the DSL will disclose any information about a young person to other members of staff on a need-to-know basis, and in the best interests of the young person. All staff members must be aware that they cannot promise anyone to keep secrets which might compromise someone’s safety or well-being.

All staff members have a professional responsibility to share information with other agencies in order to safeguard children in line with the procedures set out by the three safeguarding partners.

All our staff members who come into contact with children will be given appropriate training to

understand the purpose of information sharing in order to safeguard and promote children’s welfare.

We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

The key points of **confidentiality** are summarised below:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - a) There are not easy or definitive answers when a victim makes this request and staff taking a report should never promise confidentiality, because even if a victim doesn’t consent to sharing information, staff may still lawfully share it if there’s another legal basis under the UK GDPR that applies
 - b) The DSL will have to balance the victim’s wishes against their duty to protect the victim and other children
 - c) The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims’ identities

The governments information sharing advice for safeguarding practitioners includes 7 golden rules for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 15 and allegations of abuse against staff in appendix D.

The **following principles** guide our practice on consent and information sharing:

- We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.
- We may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by Children’s Social Care.
- The Data Protection Act 2018 is not a barrier to sharing information. It is there to ensure that personal information is managed in a sensible way and that a balance is struck between a person’s privacy and public protection.
- We should be sharing any concerns we have with schools and/or parents at an early stage, unless this would put a child at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.
- Be clear about the purpose of sharing confidential information and only share as much as you need to achieve your purpose.
- Try to get consent from parents (or the child, if they have sufficient understanding*) to share information, if possible. However, you do not need consent if you have serious concerns about a child’s safety and well-being. If you decide to share information without consent, you should record this with a full explanation of your decision.

Consent should not be sought from parents or carers (or the child, if they have sufficient understanding*), if:

- it would place a child at increased risk of harm; or
- it would place an adult at risk of serious harm; or
- it would prejudice a criminal investigation; or
- it would lead to unjustified delay in making enquiries about allegations of significant harm to a child; or
- required by law or a court order to share information.

Consent is not necessary in cases where Children’s Social Care are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children’s Social Care; staff members must make sure to record what information has been shared.

* Children aged 12 or over may generally be expected to have sufficient understanding. Younger children may also have sufficient understanding. All people aged 16 and over are presumed, in law, to have the capacity to give or withhold their consent, unless there is evidence to the contrary.

Consent is necessary for:

- Children’s Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children’s Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in Children’s Social Care.
- Early help assessments. Assessments are undertaken with the agreement of the child and their parents or carers.

If you are in any doubt about the need for seeking consent, get advice from the DSL or from Children’s Social Care.

Keep a record of your decision to share information, with or without consent, and the reasons for it. Remember also that it is just as important to keep a record of why you decided not to share information as why you did so.

8. Recognising abuse and taking action

Staff, volunteers and approved contractors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

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

Referral procedures are provided in Appendix F – flow chart for raising concerns about a child.

If you have any doubt about how to report abuse to the local authority, you can use this link to get contact details: <https://www.gov.uk/report-child-abuse-to-local-council>

8.2. If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

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

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

8.3. If you discover that FGM has taken place or a Participant is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a Participant has already been subjected to FGM, and factors that suggest a Participant may be at risk, are set out in appendix E of this policy.

Any staff member who either:

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

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

The duty for staff members mentioned above does not apply in cases where a Participant is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine Participants.

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

8.4. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Appendix F illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible. Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’

below). Share any action taken with the DSL as soon as possible.

Early help

Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our organisation or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later. If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our organisation will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard Children* and local guidance, to any child who needs it.

We will pool our knowledge with other agencies about which families or children need additional support in a range of ways so that we can work out how best to help them. We will use the early help framework within Children's Social Care to identify what level of need the child or their family has.

The DSL will keep the case under constant review and will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

8.5. If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff can call to raise concerns about extremism with respect to a Participant. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8.6. If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. Please also read the organisation’s mental health statement which outlines the support available for children and staff throughout the organisation.

The Department for Education provides guidance on [mental health and behaviour in schools](#) and we provide training and support to staff in supporting Participants with mental health concerns.

8.7. Concerns about a staff member, volunteer or contractor

If you have concerns about a member of staff (including a volunteer or contractor), or an allegation is made about a member of staff (including a volunteer or contractor) posing a risk of harm to children, speak to the DSL as soon as possible. If the concerns/allegations are about the DSL, speak to the CEO or another member of the SLT.

The DSL or senior leader as outlined above will then follow the procedures set out in appendix D, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a volunteer or contractor) to the DSL, report it directly to the local authority designated officer (LADO).

8.8. Allegations of abuse made against other Participants

We believe that all children have a right to a safe environment. Children should be free from harm by adults and other students.

We recognise that some Participants will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the our Behaviour Policy.

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable

behaviours and an unsafe environment for participants.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of Participants hurting other Participants will be dealt with under our behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put participants at risk
- Is violent
- Involves participants being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix E for more information about child-on-child abuse.

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the referring school if applicable, and/or the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Creating a supportive environment and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female Participants, and initiation or hazing type violence with respect to boys
- Ensure our programme helps to educate Participants about appropriate behaviour and consent
- Ensure participants are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the programme,

or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a participant harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent us from coming to our own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

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

8.9. Sharing of nudes and semi-nudes (‘sexting’)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a participant to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the participant to delete it
- Ask the Participant(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the participant(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the participant(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to participant(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the Participants involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the Participants involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any Participant in the images or videos is under 13
- The DSL has reason to believe a participant is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

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

If at any point in the process there is a concern that a Participant has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the participant at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through calling the police and completion of a MASH referral using the Multi Agency Framework (MAF) as appropriated.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

8.1.0. Reporting systems for our Participants

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring Participants feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for participants to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for participants – through posters, discussions and website information
- Make it clear to participants that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Use our annual audit cycle to check with participants about their confidence and knowledge about the reporting systems

9. Online safety and the use of mobile technology

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

To address this, we aim to:

- Ensure we have in place the appropriate level of security protection procedures to safeguard systems, staff and participants – we will review these periodically to keep up with evolving cyber-crime technologies – these procedures are outlined in more details in our ICT and online safety

policy

- Protect and educate the whole I2I community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones whilst on our site and during programmes
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The four key categories of risk

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

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

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

- Educate participants about online safety including:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring Participants are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website and communications sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to work for their own use, but will limit such use to non-contact time when participants are not present
 - Staff will not take pictures or recordings of participants on their personal phones or cameras
- Make all participants, staff and volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet on our premises and during programmes, use of our ICT systems and use of their mobile and smart technology

- Explain the sanctions we will use if a participant is in breach of our policies on the acceptable use of the internet and mobile phones
- Put in place robust filtering and monitoring systems to limit participants exposure to the 4 key categories of risk (described above) from our IT systems
- Limit participants' exposure to the above risks from our IT system. Systems are regularly reviewed, and DSLs know how to escalate concerns when identified.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our community.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our policy on ICT and online safety and the use of mobile phones, please refer to our staff code of conduct and social media policies.

10. Notifying parents or carers

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care team to make sure our approach to information sharing is consistent.

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

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

11. Participants with special educational needs, disabilities or health issues

We recognise that participants with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Participants being more prone to peer group isolation or bullying (including prejudice-based bullying) than other participants

- The potential for participants with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

To address these additional challenges we will ensure that these children receive additional monitoring and support. This includes individual risk assessment and safety plans being put in place for each student, support with acquiring and maintaining EHCPs, 1:1 coaching and mentoring, provision of counselling as needed and multi-agency support as considered appropriate.

Any abuse involving participants with SEND will require close liaison with the DSL (or deputy) and the SENCO.

12. Participants with a social worker

Participants may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

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

Where we are aware that a participant has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the participants safety, welfare and programme outcomes.

13. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

Our youth coaches are responsible for promoting the achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The youth coaches are appropriately trained and have the relevant qualifications and experience to perform their role.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children.

14. Complaints and concerns about I2I safeguarding procedures

14.1. Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix D).

14.2. Other complaints

We recognise that participants cannot be expected to raise concerns in an environment where staff member fail to do so.

We have a clear reporting procedure for participants, parents and other people to report concerns or complaints, including abusive or poor practice.

We will actively seek the views of children, parents and carers and staff members on our child protection arrangements through surveys, questionnaires and other means.

Further information and support for staff is available in Appendix D on managing allegations, our code of conduct, and our whistleblowing policy.

14.3. Whistleblowing

Our whistleblowing policy provides details of how concerns can be raised about our safeguarding practice – it is available publicly on our website.

15. Record keeping

Accurate and timely record keeping is an important part of our accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children. We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have finished the programme.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

We use CPOMS for the secure storage and sharing of information related to safeguarding. If staff do not feel confident in the use of CPOMS they should ask for further training from the DSL.

All staff members, volunteers, contractors and activity providers should ensure that they record and report safeguarding concerns in line with guidance from the local multiagency procedures.

The DSL will ensure that records (be they on CPOMS or in paper format) are maintained appropriately and

securely for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

In addition:

- Appendix C and our safer recruitment procedures set out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix D sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1. All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-community safeguarding approach and wider staff training, and programme planning
- Be in line with advice from our safeguarding partners
- Support the expectation that all staff:
 - a) Manage behaviour effectively to ensure a good and safe environment
 - b) Have a clear understanding of the needs of all participants

It will include the following aspects:

All new members of staff, including any administrative and support staff, will be given an induction which includes the following:

- Issue and explain the safeguarding and child protection policy
- Issue and explain the behaviour policy
- Issue and explain the staff code of conduct
- Issue and explain the policy/guidance which includes the safeguarding response to children who go missing from education
- Explain the role of the DSL and share the identities of the DSL and all DDSLs
- Issue Part One and Annex B of Keeping Children Safe in Education
- Child protection and safeguarding training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.)
- All new members of staff are expected to read the above-mentioned documents and to sign an acknowledgement of this.

The induction and CPD programme for staff will include the following key aspects:

- Staff understand the difference between a safeguarding concern and a child in immediate danger

or at risk of significant harm.

- Staff are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned.
- When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Staff understand that children’s poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.
- Staff understand that children who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health.
- Staff understand that children being absent for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- Staff understand that mental health issues for children may be an indicator of harm or abuse, or where it is known that a child has suffered harm or abuse this may impact on their mental health, behaviour and education.
- All staff, but especially the DSL (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- Staff know how best to respond to a child who makes a disclosure of abuse or harm.
- If staff are unsure, they should always speak to the DSL or deputy DSL.
- If staff have any concerns about a child’s welfare, they should act on them immediately.
- Staff should not assume a colleague or another professional will take action.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from the LADO. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.
- Staff will have training on the government’s anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Volunteers will receive appropriate training, if applicable.

We will maintain accurate records of staff induction and training.

16.2. The DSL and Deputy DSLs

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

16.3. Recruitment – interview panels

At least one person conducting any interview for any post will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix C of this policy and our safer recruitment statement for more information about our safer recruitment procedures.

16.4. Staff who have contact with participants and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Quality Assurance and monitoring of effectiveness

We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of child protection files and records by the DSL.

We will complete an annual programme of audits and reviews. This includes: an internal audit and an externally commissioned audit. We will also participate in any reviews requested by the Local Safeguarding Children Partnership or Local Authority. We will also carry out regular internal audits.

Our Board of Directors will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements.

This policy will be reviewed **annually** by the Board of Directors and our Internal and External Safeguarding Lead.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Anti-bullying
- Staff code of conduct (with staff handbook)
- Complaints
- Children missing education
- Positive handling and de-escalation
- Administration of medicines
- Health and safety
- Attendance
- ICT and Online safety
- Social media

- Equality
- Mental health
- First aid
- Curriculum
- Privacy notices
- Whistleblowing

These appendices are based on the Department for Education’s statutory guidance, **Keeping Children Safe in Education**.

APPENDIX A

The role of the Designated Safeguarding Lead (and deputy)

1 MANAGING REFERRALS

- 1.1 Refer all cases of suspected abuse to local authority Children’s Social Care and to the Police if a crime may have been committed.
- 1.2 Liaise with the CEO and referring school (if applicable) about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- 1.3 Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding.
- 1.4 Liaise with agencies providing early help services and coordinate referrals to targeted early help services for children in need of support. Monitor any cases referred to early help and consider referral to children’s services where the situation does not improve.
- 1.5 Refer cases to the Channel programme where there is a radicalisation concern as required.
- 1.6 Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.

2. WORKING WITH OTHERS

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff;
- Act as a first point of contact for all safeguarding enquiries and concerns;
- liaise with the CEO and referring schools (if applicable) to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- Liaise with staff on matters of safety and safeguarding and welfare (including online and digital safety): when deciding whether to make a referral by liaising with relevant agencies and so that children’s needs are considered holistically;
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Promote positive outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children’s attendance, engagement and achievement.
- Working with the CEO and other staff, the designated safeguarding lead should take lead responsibility for:
 - ensuring that the relevant staff know who its cohort of children who currently need a social worker are, understanding their progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - support staff to feel confident to provide additional support or reasonable adjustments to help children who need or have needed a social worker reach

their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

3. INFORMATION SHARING AND MANAGING THE CHILD PROTECTION FILE

- 3.1 The DSL is responsible for ensuring that child protection files are kept up to date and stored securely. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.
- 3.2 Where the participant has been referred as part of their mainstream education the designated safeguarding lead should ensure all safeguarding concerns are reported to the school within a suitable timeframe depending on the nature of the concern. All applicable data and files regarding that child should be shared with an approved person from the referring school.

4. AWARENESS RAISING

- 4.1 Review the safeguarding and child protection policy and procedures annually
- 4.2 Make the safeguarding and child protection policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and our role in any investigations that ensue.
- 4.3 Provide updates to staff on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews, at least annually.
- 4.4 Help promote positive outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with staff. This could include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting staff to identify the challenges that children in this group might face and the additional support and adjustments that they could make to best support these children.

5 TRAINING, KNOWLEDGE AND SKILLS

- 5.1 The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children’s social care, so they:
 - understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements;
 - have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
 - ensure each member of staff has access to, and understands, the child protection policy and procedures, especially new and part time staff;
 - are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
 - understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
 - understand the importance of information sharing, both within the organisation, and external

safeguarding partners, other agencies, organisations and practitioners;

- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the organisation with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to young people and taking account of their wishes and feelings, among all staff, in any measures the organisation may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

APPENDIX B

Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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 participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger,

or the exploitation or corruption of children.

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
- 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy 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 care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

APPENDIX C:

Safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. Our recruitment procedures and safer recruitment statement provide more detail about actions we take to ensure we recruit suitable people.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

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

Advertising

When advertising roles, we will make clear:

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

disclosed, we cannot take them into account.

Application forms

Our application forms will:

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

Shortlisting

Our shortlisting process will aim to include three people and will:

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true and that they will inform us should there be any subsequent change to the information.

We may also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. This will be completed by someone with no other involvement in the recruitment process. If this is to occur, I2I will inform shortlisted candidates that online searches may be done as part of due diligence checks.

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

We will record all information on the checks carried out in our single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could, where available, include:
 - For all staff: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter confirming they have not imposed any sanctions or restrictions, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

Regulated activity means a person who will be:

- Responsible, on a regular basis for training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or

- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work directly with the participants or within our premises has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Adults who supervise Participants on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a Participant under 16 on work experience. This will depend on the specific circumstances of the

Work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Single Central Record

The CEO and lead for safeguarding are responsible for ensuring that our **single central record** is accurate and up to date. This will be checked at regular intervals throughout the year in line with our quality assurance process.

APPENDIX D:

Managing allegations of abuse made against all staff including support staff, volunteers and contractors

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the young people we work with. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. Our general principles are outlined below and are based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education':

I21 will provide support and advice to staff should there be an allegation against an adult.

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including support staff, volunteers or contractors, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of work

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the CEO or another Director where the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the business so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the business so that they do not have unsupervised access to children
- Moving the child or children to groups where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location.

If in doubt, the case manager will seek views from the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. It is important to ensure that local documentation is completed to the LADO this could include a LADO referral form and MAF. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate.

Where the case manager is concerned about the welfare of other children in the community or the individual’s family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children’s social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact within the organisation and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action and/or liaise with the police and/or children’s social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the referring school (if applicable) and/or parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice
- Keep the referring school (if applicable) and/or parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- Where the police are involved, wherever possible we will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in our disciplinary process, should this be required at a later point.

Additional considerations for support staff and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by us, such as volunteers or contracted staff, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- We will discuss with the external organisation that has provided the contractor whether it is appropriate to suspend the individual, or redeploy them to another part of the business (if possible) until the investigation has been carried out. We will involve the organisation fully, but we will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the organisation are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the organisation where necessary)

When using an external organisation, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the organisations HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or we cease to use their services, or the individual resigns or otherwise ceases to provide their services, we will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending our programme.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, we will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, we will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

We will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, we will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the

Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Managing the situation and exit arrangements

Inspire 2 Ignite has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety and welfare of children, including any in which the person refuses to cooperate with the process.

‘Settlement agreements’ (sometimes known as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person’s notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority’s designated officer to determine whether there are any improvements that we can make to our procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority’s procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the academy that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including support staff, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

It also applies to organisations or individuals using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we would follow safeguarding procedures, including informing the LADO.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of Inspire 2 Ignite may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis where they can't easily be seen
- Humiliating Participants

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in

themselves and others

- Empowering staff to share any low-level concerns as per section 7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any patterns, clusters or concerns in our safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the DSL will appoint an incident assessor who will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The incident assessor will follow the guidance set out in our 'Incident Toolkit' and collate the relevant information using the templates within that tool kit. They will give this to the CEO who will use the information collected to categorise the type of behaviour and determine any further action, in line with our staff code of conduct and where, relevant in consultation with their line manager.

Further information about responding to low-level concerns is provided in this DfE recommended report: [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at Inspire 2 Ignite

Where a low-level concern relates to support staff or a contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

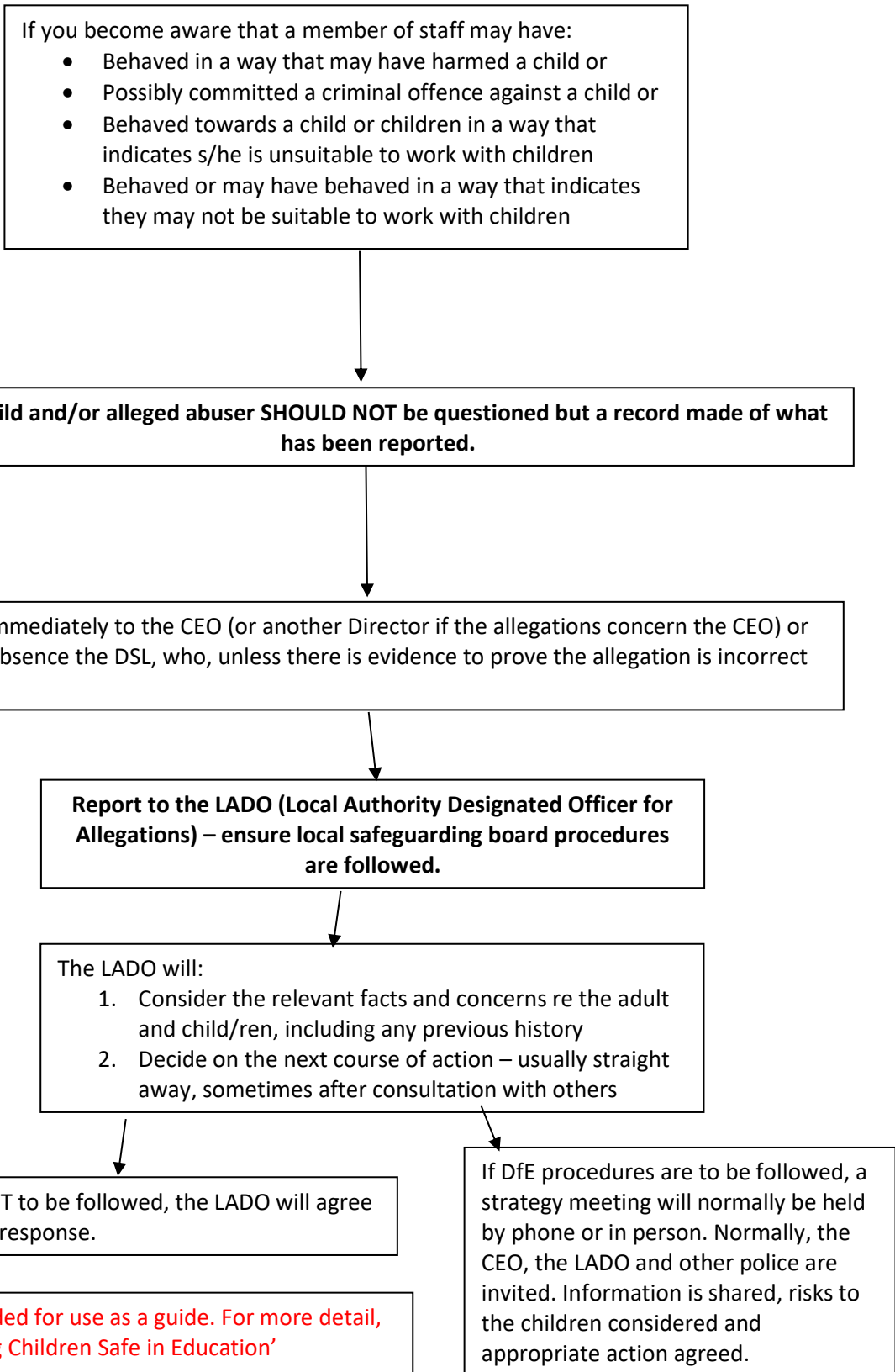
References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

The flow chart below summarises the procedures to be followed when dealing with an allegation made against an individual who works with children.

Allegations against a staff member: Guidance flow chart



If DfE procedures are NOT to be followed, the LADO will agree with you an appropriate response.

This document is intended for use as a guide. For more detail, please refer to 'Keeping Children Safe in Education'

If DfE procedures are to be followed, a strategy meeting will normally be held by phone or in person. Normally, the CEO, the LADO and other police are invited. Information is shared, risks to the children considered and appropriate action agreed.

APPENDIX E

Specific safeguarding issues

This appendix is based on the advice in Keeping Children Safe in Education, in particular annex B – which also includes information on further issues to be aware of, including child abduction and community safety incidents, children’s involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime. **All staff should read Annex B in addition to this appendix.**

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the referring school (if applicable) and/or the local authority and adhering to requirements with respect to sharing information with the local authority.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children’s social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

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

Child-on-child abuse

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

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

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

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

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

Domestic abuse

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

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

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

Older children may also experience domestic abuse and/or violence in their own personal relationships.

This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

FGM

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

Section 7 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a Participant is at risk of FGM.

Indicators that FGM has already occurred include:

- A participant confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/participant already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise
 - Being repeatedly absent, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem

- Talking about pain or discomfort between her legs

Potential signs that a Participant may be at risk of FGM

include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from an adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into 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 to coerce a person into marriage.

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

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

The DSL will:

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

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children on our programmes being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our participants to stay safe online whilst with us and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in participants behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a Participant is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter

- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a participant, they will follow our procedures set out in section 7 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in educational settings

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or education setting.

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

When supporting victims, staff will:

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

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

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

Serious violence

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

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

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

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

We check the identity of all visitors and volunteers coming into our facilities. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on site. I2I has a system of blue and red lanyards to differentiate between those who can be on site unattended and those who need to be supervised by another adult at all times. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

Visitors who are visiting for a professional purpose, will be asked to show photo ID and:

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

- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise participants or staff.

We will not accept the behaviour of any individual, parent or anyone else, that threatens security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the site.

Missing Participants

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the referring school (if applicable) and/or the parent/carer immediately and inform the police inline with procedures outlined in our attendance policy.

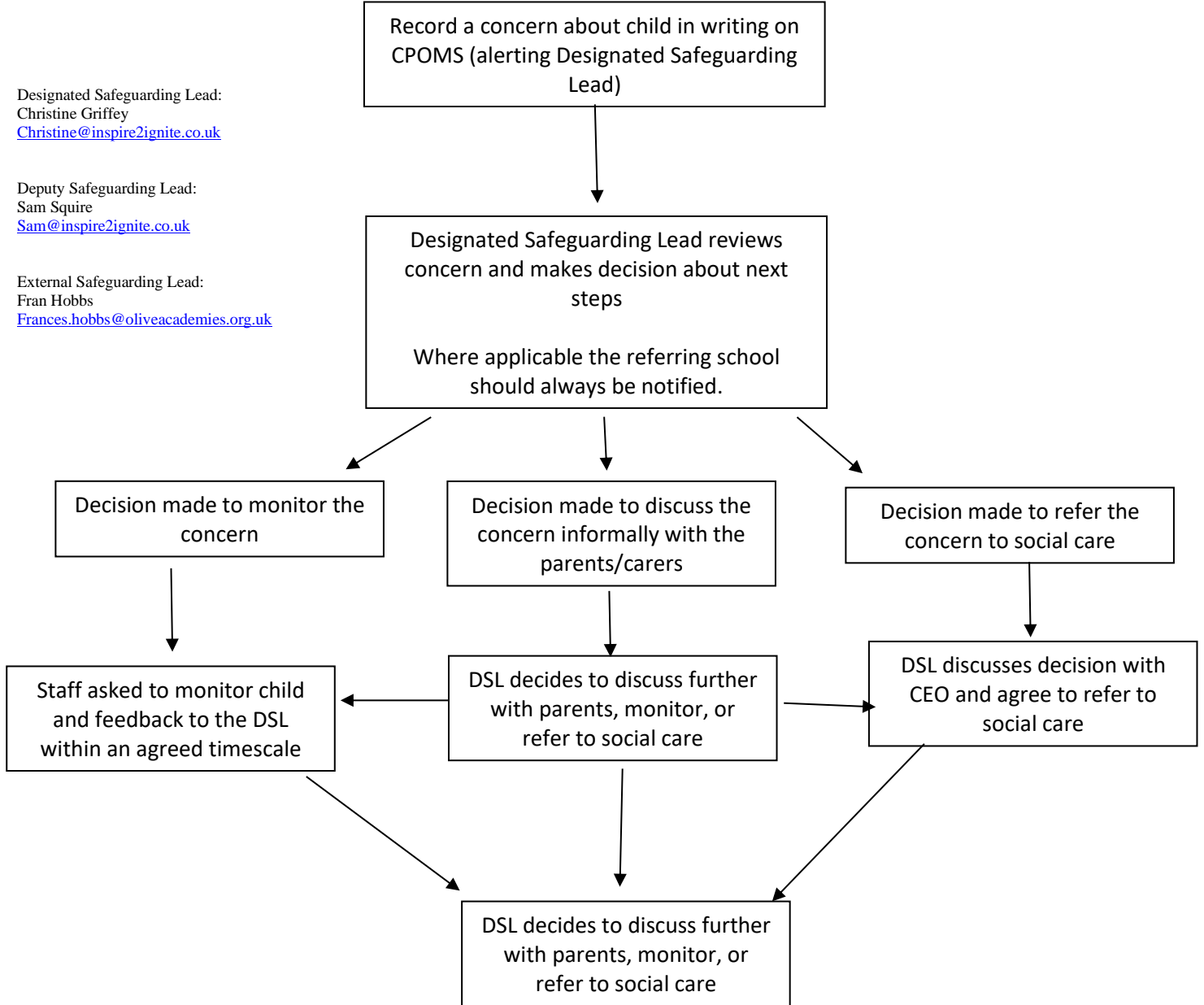
APPENDIX F

Flow chart for raising safeguarding concerns about a child

Designated Safeguarding Lead:
Christine Griffey
Christine@inspire2ignite.co.uk

Deputy Safeguarding Lead:
Sam Squire
Sam@inspire2ignite.co.uk

External Safeguarding Lead:
Fran Hobbs
Frances.hobbs@oliveacademies.org.uk



In exceptional circumstances, anyone may report concerns or seek advice directly from:

Cambridgeshire Children Services on
0345045 5203

Contact Details for Social Care and Prevent Channel Referrals:

Cambridgeshire Childrens Service Centre:
T: 0345 045 5203

Emergency Duty Service:
T: 01733 234 724

APPENDIX G

FURTHER INFORMATION

1. Cambridge Local Safeguarding Children Partnership:
<https://www.safeguardingcambspeterborough.org.uk/children-board/>
2. Cambridge Child Missing Education guidance:
<https://www.cambridgeshire.gov.uk/residents/children-and-families/schools-learning/education-your-rights-and-responsibilities/children-missing-from-education#:~:text=If%20you%20have%20concerns%20for,remain%20anonymous%20to%20the%20family.>
3. Cambridge Child Sexual Exploitation Guidance:
<https://www.safeguardingcambspeterborough.org.uk/children-board/parents-carers/child-exploitation/child-sexual-exploitation/>
4. Sharing nudes and semi-nudes guidance: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
5. DfE Guidance: Safeguarding practitioners: information sharing advice:
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
6. DfE Statutory guidance: Working together to safeguard children:
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
7. DfE Statutory guidance: Keeping children safe in education
www.gov.uk/government/publications/keeping-children-safe-in-education--2
8. DfE guidance: Sexual violence and sexual harassment between children in schools and colleges:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf
9. DfE: Advice what to do if you are worried that a child is being abused 2015:
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
10. Guidance on e-security – [National Education Network](#)
11. [Cyber security standards for schools and colleges](#)
12. LGfL online safety policies: lgfl.net
13. The Prevent duty – guidance for schools and childcare providers:
<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>