



Safeguarding and Child Protection Policy March 2023

This policy is for A-List Education

Written by: Alison Bissell, Designated Safeguarding Lead & Director	20.03.2023
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Approved by: Geoff Marston Safeguarding & Compliance Director	29.05 2023
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Contents

1. Introduction.....	5
2. Relevant Statutory and Non-Statutory Advice.....	5
3. Relevant Policies	6
4. Key Personnel for Safeguarding and Child Protection	7
6. Safeguarding Reporting Summary	11
7. Aims.....	12
8. The Designated Safeguarding Lead	13
9. The Deputy DSL	15
10. Responsibilities of STAFF	15
11. Responsibilities of the Director of A-List Education	16
12. Responsibilities of the Safeguarding Managing Director and Proprietor.....	16
13. Director of Dukes Plus.....	18
14. Director of A-List Education.....	18
15. The Group Compliance Director.....	19
16. The Compliance Director (Colleges)	19
17. Young People with special educational needs and disabilities (SEND)	20
18. What to do when there are concerns or if a child makes a disclosure	20
19. Procedures if staff have a concern about a child or young person.....	21
20. Procedures for staff if a child or young person discloses information	21
21. Mechanisms for Young People to report concerns	22
22. Support for staff	22
23. Recording Safeguarding Concerns.....	22
24. DSL Action on receipt of a concern about a child	23
25. Preserving evidence.....	24
26. Child protection records	24
27. Information sharing.....	25
28. Communication with parents/carers	26
29. Referrals to Children's Services and/or other agencies	26
30. Early Help.....	27
31. Westminster Local Authority Threshold Levels 3 and 4.....	27
32. Safer recruitment.....	28
33. Visiting Speakers	29
34. Staff Induction	29
35. Staff Training	30
36. DSL and DDSL Training	30
37. Managing Director Training	30

38.	Acceptable Use of technology	30
39.	Staff Code of Conduct	31
40.	Whistleblowing	31
41.	Allegations against staff	32
42.	Reporting an allegation or concern	32
43.	Procedures & Informing the Local Authority Designated Officer (LADO)	33
44.	Allegations relating to third party contractors	35
45.	Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)	35
46.	Low-Level Concerns	36
47.	Non-recent / Historical allegations	38
48.	Managing Director and Proprietorial Oversight	38
49.	Other documents informing the policy	38
50.	APPENDIX 1	40
(i)	Definitions of Abuse	40
(ii)	Risk factors	41
(iii)	Recognising signs of physical abuse	41
(iv)	Recognising signs of emotional abuse	42
(v)	Recognising signs of sexual abuse	43
(vi)	Signs of neglect	44
(vii)	Affluent neglect	45
(viii)	Specific safeguarding issues	45
(ix)	Child abduction and community safety incidents	46
(x)	Children and the court system	46
(xi)	Children who go missing from education	47
(xii)	Children with family members in prison	47
(xiii)	Child Sexual Exploitation (CSE)	47
(xiv)	Child Criminal Exploitation (CCE) including gangs and County Lines	48
(xv)	Domestic abuse	48
(xvi)	Extra-familial Harms	49
(xvii)	Operation Encompass	49
(xviii)	Homelessness	50
(xix)	So called 'honour based' abuse (HBA)	50
(xx)	Female Genital Mutilation	50
(xxi)	Mandatory Reporting of FGM	51
(xxii)	Forced Marriage	51
(xxiii)	Mental health	51
	Child-on-Child Abuse (formerly known as Peer-on-peer abuse)	53

(xxiv)	Children who are lesbian, gay, bi, or trans (LGBT)	53
(xxv)	Strategies to reduce the risk of child-on-child abuse	55
(xxvi)	Prejudiced Behaviour	55
(xxvii)	Child-on-child Abuse - sexual violence and sexual harassment	55
(xxviii)	Considering confidentiality and anonymity	57
(xxix)	Risk assessment	58
(xxx)	Appropriate Support for Victim and Perpetrator	59
(xxxi)	E-safety and online behaviour	59
(xxxii)	Remote Education	60
(xxxiii)	Filters and monitoring	60
(xxxiv)	Youth produced sexual imagery, nudes/semi-nudes, sexting, up-skirting	60
(xxxv)	Thresholds of Sexual behaviour by children	61
(xxxvi)	Preventing Radicalisation	61
(xxxvii)	Recognising Extremism	62
(xxxviii)	Channel	62
(xxxix)	Private Fostering	62
(xl)	Fabricated Illness	63
51.	Appendix 2	63
(i)	Human Rights Act	63
(ii)	Equality Act 2010	63
52.	Appendix 3	64
(i)	Child Protection Guidance Notes to all Staff: How to Respond to Allegations of Abuse from a Child	64
53.	Appendix 4	66
(i)	Referrals Form	66
54.	Appendix 5	67
(ii)	Guidance for Online Sessions for Staff	67

A-List Education

1. Introduction

This Policy is the responsibility of the **Director of A-List Education** and is reviewed annually as part of the company's annual safeguarding review undertaken by Mr Ricky Tavares, Director of Dukes Plus and Dukes Education Managing Director Mr Tim Fish or when legislation or government guidance dictates.

It has been updated with having due regard to *Keeping Children Safe in Education* KCSIE **September 2022** as well as requirements from our local **Westminster** Safeguarding Children's Partnership

A-List Education will operate safeguarding procedures in line with our locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners.

There is a whole **company** commitment to safeguarding of all our children and young people. This extends from our Dukes Managing Directors, Director, senior leadership team and everyone who works and volunteers at **A-List Education**.

All staff have a duty to maximise the welfare, health, and safety of anyone in our care and to take immediate action to protect them from harm or any risk of harm.

A-List Education recognises its responsibilities for all aspects of safeguarding and child protection and the safety of children or young persons is always accorded the highest priority, whether they engage with us face to face or online.

Every child and young person should feel safe and protected from any form of abuse, neglect or exploitation including from using SMART technology.

All staff understand that safeguarding is "everyone's responsibility" and must act swiftly when any concerns are disclosed, or events witnessed.

Everyone who encounters children, and their families (or carers) has a role to play in safeguarding and should ensure their approach is child centred: this means considering at all times what is in the best interests of the child.

This policy is available on the **company's** website: www.alisteducation.co.uk and it is also available on request from the **A-List's Head Office** on **+44 (0)20 3004 8101** or by email info@alisteducation.co.uk. The policy is available in large print or another accessible format if required.

Awareness of our safeguarding policy will also be made to staff during their induction training or if returning to work for us. All staff will have access to the policy.

The procedures as outlined in this policy apply wherever our staff, volunteers or contractors are working with or near our child or young person, even when this is away from our Head Office, for example at a residential venue or online.

This policy applies to all **young persons** attending any event, tutorial, consultation or online service provided by our company.

2. Relevant Statutory and Non-Statutory Advice.

This policy is written with regards to both the advice below and in Appendix 2 of this policy:

Keeping Children Safe in Education (KCSIE), DfE, September 2022	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf
KCSIE supplement – safeguarding and remote education	Non-statutory interim supplement to KCSIE: Safeguarding and

	remote education during coronavirus
Disqualification Under the Childcare Act 2008 – updated August 2018	https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006
Working Together to Safeguarding Children Updated Sept 2020 WT refers to the non-statutory but important advice Information sharing (2018)	Working together to Safeguard Children (September 2018 updated September 2020) (WT)
DfE statutory guidance ‘Children missing education’ (September 2016)	https://www.gov.uk/government/publications/children-missing-education
The Independent School Standards (England) Regulations, DfE, 2014. Updated 2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800615/Independent_School_Standards- Guidance_070519.pdf
The National Minimum Standards for Boarding, DfE 2015 and updated 2022.	https://www.gov.uk/government/publications/boarding-schools-national-minimum-standards
EYFS Framework March 2021	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974907/EYFS_framework_-_March_2021.pdf
DfE Guidance <i>What to do if you're worried a child is being abused</i> (March 2015)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
RSE and Health Education Updated 13th September 2021	Relationships Education, Relationships and Sex education (RSE and Health Education (2019, Updated September 2021
Prevent Duty 2015 – Updated April 2021	Prevent Duty: Guidance for England and Wales (July 2015, updated April 2021) (Prevent)
NSPCC E-Safety Guidance for Schools March 2022	https://learning.nspcc.org.uk/research-resources/schools/e-safety-for-schools
Sexual Violence and sexual harassment between children in schools and colleges, DfE, Sept 2021	https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges Still available but withdrawn and guidance provided in KCSIE.
Sharing nudes and semi-nudes: advice for education settings working with children and young people, DfE, 23rd December 2020. (Non-statutory advice)	https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people Still available but withdrawn and guidance provided in KCSIE.
Guidance that any child investigated by the police whether in or out of school should have an appropriate adult with them. November 2020.	www.safeguarding.link/pace . https://www.gov.uk/government/publications/pace-code-c-2019

3. Relevant Policies


This safeguarding and child protection policy has also been developed by taking account of the following **A-List Education** policies below and should be read in conjunction with them:

Policy	Location
Acceptable use of ICT Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EQbQbzdZP8pLp2qd3UQMeRwBTyE5tPfQSB_L0Hf6TGkXEA?e=iLvGgQ
Children's Anti-bullying Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EVCP9PcdwABlh-t3mT3hwxsBWOScXyU4yf8FY5h-ffWnRw?e=QOcW8h


Employee Handbook	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EYGoNtg7bMdMjWOjPr98t8YBW5VxXaq0-8b4J4rmZ51C3g?e=O4btDU
Equality, Diversion and Inclusion Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EUyWdXbxzJRBsOmBPFURdaQB8AUKSNaXCL2FRA0ZE7wsjA?e=ZlfoEi
First Aid Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EUD8PFaZAn5LnyZMJSP1xWQBLVs-hMYyLvm9NuVcRVkbpq?e=raJQlj
Health and Safety Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EV0HTKFWTd1BtJk6F9yQckoBrF3nQ00r7W2zJozRTZ92Jg?e=lgZooy
Lone Worker Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/ES1JE0wirvdFtnarZbhxEJsBOEfJm4yf9z44_YRFmYC4BQ?e=ZPc1fs
Missing Child Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EXnx4XhyxW1Dnb20CDdijxwBzhrP36HVDfQBnoTZI-OyYA?e=CeMhcY
Recruitment Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EWnJ3sJbc4ZNhPOoYoB3DaQBcB8eTdes0zBoR90AsvGd_w?e=3LOt9V
Staff Anti-harassment and Anti-bullying Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/EaLtrQEnGXZEiFvQjlpYFoYBd_5gNFscHsJR21s16pCSuA?e=Q0jCeT
Staff Code of Conduct Policy	https://alistuk.sharepoint.com/:b:/s/A-ListEducationUK/ETfgIDBCBZtMrXWjG48_1QIBTtVfih9y_f7MzbpAU3M4Aw?e=hRGWI7

Any questions regarding this policy should be directed towards our Designated Safeguarding Lead in the first instance, Ms Alison Bissell on alison.b@alisteducation.co.uk.


4. Key Personnel for Safeguarding and Child Protection

Designated Safeguarding Lead (DSL) and Director of A-List Education:	
Name	Ms Alison Bissell
Telephone / Extension:	020 3004 8101
Email:	Alison.b@alisteducation.co.uk
Photo:	

Designated Deputy Safeguarding Lead (DDSL):	
Name	Mrs Mariel Kessel
Telephone / Extension:	020 3004 8101
Email:	Mariel.k@alisteducation.co.uk
Photo:	

Chairman of Dukes Education:	
Name:	Mr Aatif Hassan
Telephone:	020 3696 5300
Email:	Aatif.hassan@dukeseducation.com
Photo:	

Nominated Safeguarding Managing Director Dukes Education:	
Name:	Mr Tim Fish
Mobile:	07803 935 385
Email:	tim.fish@dukeseducation.com
Photo:	

Director of Dukes Plus:	
Name:	Mr Ricky Tavares
Mobile:	07793 203 912
Email:	Ricky.tavares@dukeseducation.com
Photo:	

Group Compliance Director, Dukes Education:	
Name:	Mr Geoff Marston
Telephone:	07831 624 287
Email:	geoff.marston@dukeseducation.com
Photo:	

Compliance Director, Colleges:	
Name:	Mr Paul Ludlow
Mobile:	07854 012 130
Email:	paul.ludlow@dukeseducation.com
Photo:	

5. Key External Agencies, Services and Professionals' Contact Details

London Safeguarding Children Partnership

Name:	Alison Renouf – London Board Manager
Address:	London Safeguarding Children Board, 59½ Southwark Street, London SE1 0AL
Telephone:	020 7934 9714

Email:	alison.renouf@londoncouncils.gov.uk
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Westminster MASH / Children's Contact Team / Early Help

Name:	Karen Duncan
Telephone:	020 7641 3991
Email:	kduncan1@westminster.gov.uk

Westminster Local Authority Designated Officer (LADO) / Child Protection Lead Officer

Name:	Aqualma Daniel
Address:	Kensington Town Hall 2nd floor, Green zone Hornton Street London W8 7NX
Telephone:	020 7641 7668
Mobile:	020 7361 3009 (for schools) and 07870 481 712
Email:	KCLADO.enquiries@rbkc.gov.uk

Westminster Local Authority Safeguarding Lead Officers / Children's Service Managers

Name:	Angela Flahive, Head of Safeguarding, Review and Quality Assurance
Telephone:	020 7361 3467
Mobile:	07971 320 888
Email:	angela.flahive@rbkc.gov.uk

Westminster Local Authority Safeguarding Lead Officers / Service Managers

Name:	Angela Flahive, Head of Safeguarding, Review and Quality Assurance
Telephone:	020 7361 3467
Mobile:	07971 320 888
Email:	angela.flahive@rbkc.gov.uk

Westminster Local Authority Online Safety Contact Officer

Name:	-
Address:	-
Telephone:	-
Mobile:	-
Email:	-

Westminster Local Authority Prevent Education Officer

Name:	Provided by an agent
Mobile:	0781 705 4759
Email:	prevent@westminster.gov.uk

Police Counterterrorism / Prevent Officer

Name:	Kiran Malik
Telephone:	020 7641 5071
Email:	kmalik@westminster.gov.uk

Police County Lines Officer

Name:	Metropolitan Police
Address:	Victoria Embankment, London SW1A 2JL
Telephone:	999
Mobile:	Text 1800

Police Female Genital Mutilation (FGM)

Telephone:	020 7641 4000 or 0800 028 3550
Email:	accesstochildreancesservices@westminster.gov.uk

Non-Emergency Advice

The Department for Education – telephone helpline non-emergency advice for staff and governors for extremism:	020 7340 7264
Email:	Counter-extremism@education.gsi.gov.uk

Advice Lines for Parents / Carers / Child or young persons	
Childline	0800 1111
NSPCC	0808 800 5000
Ofsted's Whistle-blower Hotline	0300 123 3155
Forced Marriage Unit	020 7008 0151 fm@fco.gov.uk

Our organisation does work with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

Please remember **anyone** can make a referral directly to children's social care or the Local Authority Designated Officer if they believe that a child is at risk or may be at risk of significant harm. Our staff do not require parental consent to make such a referral to external statutory agencies.

If a direct referral is made by a member of staff, the DSL should also be informed as soon as possible or in their absence the **Director of Dukes Plus**, Mr Ricky Tavares, or our **Safeguarding Managing Director** Mr Tim Fish.

6. Safeguarding Reporting Summary

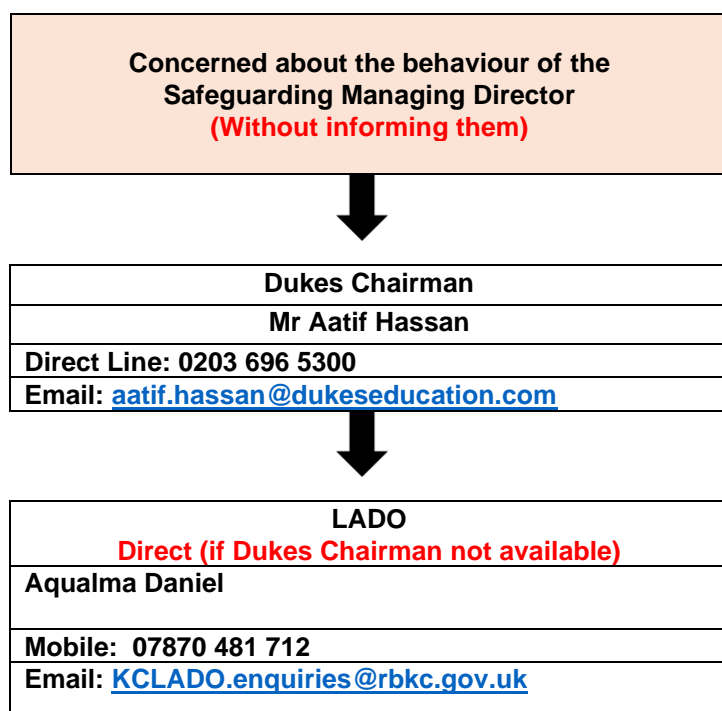
Concern / allegations about or from a child	Concern / allegations about any staff member including DDSL, Suppliers and Contractors		
↓	↓		
DSL or DDSL. Mr Paul Ludlow (Compliance Director, Colleges) for support & guidance.	Director of A-List , who will also inform any agency (without informing staff member). Mr Paul Ludlow (Compliance Director, Colleges) for support & guidance.	→	Mr Ricky Tavares Director of Dukes Plus and Tim Fish Managing Director Dukes Education will also be informed by either the DSL or Director that the Children's Services or the LADO has been contacted
↓	↓		
Local Authority Children's Services for advice / next steps	Local Authority Designated Officer (LADO) for advice / next steps		
If crime committed or suspected of being committed referral straight to the Police first (dial 101) and then inform the DSL of actions taken.			

Allegations about the Director of A-List		
↓		
Director of Dukes Plus – Mr Ricky Tavares. Mr Paul Ludlow (Compliance Director, Colleges) for support & guidance.	→	Tim Fish Managing Director Dukes Education will also be informed
↓		
Local Authority Designated Officer (LADO) for advice / next steps		
If crime committed or suspected of being committed referral straight to the Police first (dial 101) and then inform the DSL of actions taken.		

The DSL & Director of Dukes Plus can take advice from Mr Paul Ludlow (Compliance Director Colleges) and / or Mr Geoff Marston (Group Compliance Director) in Paul's absence at any time during this process if required.

Tim Fish will also make the decision to inform the Chair of Dukes Education, Mr Aatif Hassan, at the appropriate time, once either Children's Services and / LADO have confirmed next steps.

Please remember **anyone can make a referral** directly to external agency if they are unable to get hold of key personnel in these procedures.



In all cases, staff and parents are advised that phone contact will be the first point of communication to report any concerns.

Email communication is only to provide further detail if required and will not be used to believe any concern has been passed on.

If the person is not directly contacted and is unable to be found, then staff / parents will need to make further contact with key personnel on the flow charts or Children's Social Care Team and / or LADO directly.

7. Aims

The aims of this policy are:

- To ensure that effective safeguarding procedures are in place and are followed by all staff in accordance with national guidance and the locally agreed inter-agency procedures of London Safeguarding Children's Partnership (**SCP**).
- To provide a systematic means of monitoring children / young people known or thought to be at risk of harm, as well as support for those **young people**.
- To identify, monitor and support those **young people** who may be in need of Early Help including support from other agencies apart from Children's Services e.g. Child and Adolescent Mental Health Services (CAMHS).
- For all staff to be fully aware and confident of their role in safeguarding and child protection and of their responsibilities to identify and report possible concerns about the welfare of **young people**, including possible harm or abuse.
- For all staff to be fully aware of the need to report any concerns about the actions of members of staff, volunteers, visitors or contractors.

- f) To support **young people's child or young persons'** development in ways that will foster security, confidence, and independence.
- g) To be alert to the risks to young people online and to ensure, through appropriate filtering and monitoring systems, that they are safeguarded in **schools/colleges** from potentially harmful and inappropriate online material. Also see Acceptable Use of ICT Policy.
- h) To emphasise the need for good levels of communication between all members of staff.
- i) To promote effective working relationships with other agencies.
- j) To ensure that all staff are recruited in accordance with the company's Recruitment Policy and in accordance with guidance in Keeping Children Safe in Education (September **2022**) ("KCSIE") and Disqualification under the Childcare Act 2006 (September 2018).

A-List Education will also create a positive ethos to:

- a) Establish and maintain an environment where all young people feel secure, are encouraged to talk and are listened to.
- b) Ensure staff are confident to report any concerns and to deal with any disclosures.
- c) Provide early help to children/young people and their families.
- d) Have methods in place which make it easy for **young people** to report concerns as well as ensuring that all **young people** know they can talk to any adult in **A-List Education** if they are worried.
- e) Include opportunities for young people to develop the skills they need to recognise and stay safe from abuse, including abuse or exploitation through technology of all kinds as part of their safeguarding awareness training when they join us.

8. The Designated Safeguarding Lead

A-List Education has appointed a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL). **Certain** members of the Senior Leadership Team and have the necessary status, training and authority to be responsible for matters relating to the welfare of child or young persons, including child protection.

The DSL is **Alison Bissell** and can be contacted on alison.b@alisteducation.co.uk.

Responsibilities of the DSL

The main responsibilities of the DSL are as detailed in KCSIE **Annex C**, but are also detailed below:

- a) To promote a culture of safeguarding so the welfare and best interests of young people is embedded within all the company's processes and procedures.
- b) To co-ordinate and monitor safeguarding, being the first point of contact for parents, child or young persons, teaching and non-teaching staff and external agencies
- c) Immediately act upon the receipt of any concerns.
- d) To liaise with **London's** Safeguarding Children Partnership (SCP) and other neighbouring Children's Services departments.

- e) To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- f) To ensure the safeguarding **Managing Director, Mr Tim Fish** is informed about safeguarding concerns including any referrals.
- g) To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- h) To be responsible for procedures in **A-List Education** and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.
- i) To provide a systematic means of monitoring and supporting **young people** known or thought to be at risk of harm or where there are ongoing concerns.
- j) To promote the educational achievement and care of any young person who are looked after. The DSL will take lead responsibility for any looked after children.
- k) To maintain a regular training programme for all members of the **A-List Education** staff and volunteers in line with advice from **London's SCP**.
- l) To ensure all new staff receive induction training in safeguarding and understand their responsibilities as well as have received a copy of KCSIE Part 1 and / or **Annex A**.
- m) To ensure that all staff have confirmed that they have been provided with, read and understood a copy of the Safeguarding Policy (i.e., this document), KCSIE Part 1, **Annex A** as well as **Annex B** if they lead or manage or work directly with children have read and understood them.
- n) To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- o) To monitor the confidentiality, keeping and storage of records in relation to safeguarding. Access to A-List Education's child protection records are restricted to the **Director of A-List Education** DSL, Deputy DSL and the Director of Dukes Plus, Mr Ricky Tavares.
- p) To ensure the Safeguarding Policy is reviewed annually in conjunction with the **Director of A-List Education**, the Director of Dukes Plus, Mr Ricky Tavares, and the Safeguarding Managing Director, Mr Tim Fish, such review to include its effectiveness in practice
- q) To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- r) To be responsible for overseeing online safety across the company with the support of the **Dukes Education IT Team**.
- s) To ensure the Safeguarding Policy is available on the **A-List Education's** website.
- t) To ensure that "Safeguarding" is a standing item on the agenda for, and minutes of, staff meetings. This is to ensure that all members of staff will be aware that there is a safeguarding concern about that child or young person, with detailed information only shared on a 'need to know' basis. It also provides those present with an opportunity to raise any general **company** safeguarding issues.

- u) To ensure an annual report is sent to the Director of Dukes Plus and the annual Safeguarding Audit is presented to the Safeguarding Managing Director.
- v) Be aware of the requirement that children investigated by the police, whether the police are attending in school or interviewing the child at a police station, should have an appropriate adult present. www.safeguarding.link/pace. (Annexe C, KCSIE 2022, page 162).

9. The Deputy DSL

The Deputy DSL is trained to the same level as the DSL and in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of **young people**, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

The DSL and/or the Deputy DSL are available during **work** hours, either on site at Head Office, or contactable by telephone, for staff, children/young persons or parents to discuss any safeguarding concerns.

The Deputy DSL is: Mariel Kessel, Mariel.k@alisteducation.co.uk

10. Responsibilities of STAFF

- to provide a safe and supportive learning environment
- to read and understand, Part 1 of Keeping Children Safe in Education and **Annex A**, as well as **Annex B** if the lead or manage or work directly with children.
- to read and understand the company's Safeguarding Policy and Procedures i.e. this document.
- to adhere to the **company's Staff Code of Conduct**.
- to undertake regular safeguarding training, **at least annually**.
- to be alert to the signs of abuse and neglect, including **child-on-child** abuse, and to report any concerns to the DSL immediately.
- to be aware that that even if there are no reports of **child-on-child**, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- to help child or young persons understand how to keep themselves safe and manage risk.
- to be alert to absenteeism of any **young people** and inform the DSL of any concerns.
- to consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).

- to report to the **Director of A-List Education** any concerns about the conduct of adults, including low level concerns (this includes behaviour outside **A-List Education** that might indicate an individual is unsuitable to work with children).

11. Responsibilities of the Director of A-List Education

To promote an overarching culture of safeguarding so the welfare of children is embedded within all the company's processes and procedures operating with the best interests of the child at their heart.

- To have read and understood all parts of Keeping Children Safe in Education thereby ensuring that the company's policy and procedures follow statutory guidance.
- To ensure that KCSIE Part 1 (including **Annex A**) and the company's Safeguarding Policy are understood and implemented effectively by all staff, **whether or not they directly work with children**.
- To allocate sufficient time, training and resources to enable the DSL and Deputies to carry out their roles effectively.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the company's Whistleblowing procedures.
- To ensure child or young persons are taught about keeping safe, including online.
- To ensure systems are in place, which are easily understood and easily accessible for child or young persons to report concerns, including abuse.
- To deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns.
- to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults.
- To undertake training on safer recruitment processes at regular intervals.
- To monitor the effectiveness of this policy and its procedures in liaison with the Safeguarding Managing Director and the Director of Dukes Plus and to remedy any deficiencies immediately.

12. Responsibilities of the Safeguarding Managing Director and Proprietor

- a) To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of young people at their heart.
- b) To ensure policies, procedures and training in the company are effective and comply with the law at all times.
- c) To ensure there is a nominated Managing Director for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters.

- d) To ensure the nominated Managing Director has the required knowledge, skills and expertise to take leadership responsibility for the company's safeguarding arrangements.
- e) To ensure there is an effective Safeguarding Policy in place, which is consistent with KCSIE (Sept **2022**), Working Together (2018) and the requirements of the **London** Safeguarding Children Partnership (SCP).
- f) To ensure the policy is available publicly on the company's website.
- g) To ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken.
- h) To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a **Staff Code of Conduct, Anti-bullying Policy and Acceptable Use of ICT policy**.
- i) To ensure there is an effective **Staff Code of Conduct** (including online conduct) which is implemented throughout **A-List Education**.
- j) To ensure that **A-List Education** holds at least two emergency contact numbers for each young person in their care.
- k) To ensure that **A-List Education** safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all relevant checks are carried out on all staff before starting their employment and recorded in the **A-List Education's** file server.
- l) To ensure IT systems have appropriate filters installed without unduly restricting access for educational purposes.

As part of this process, the Safeguarding Managing Director will ensure that the company undertakes **regular monitoring** of filtering systems in place and regularly reviews their effectiveness. (KCSIE 2022, paragraph 140).

The Managing Director should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The Managing Director will consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks. (KCSIE 2022, paragraph 140).

- m) To have policies and procedures in place regarding young people accessing the internet while attending company events or services.
- n) A review of the Safeguarding Policy at least annually (and in the case of a serious incident), including an update and review of the effectiveness of procedures and their implementation. The annual review of safeguarding forms part of the summer term Managing Director's Review Meeting. A termly report is sent to the Safeguarding Managing Director and the annual Safeguarding Audit is presented to the Safeguarding Managing Director and Director of Dukes Plus by the DSL or the Director of **A-List Education**.
- o) Governing Bodies and proprietors should ensure that **ALL** governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction. This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our

organisation are effective and support the delivery of a robust whole company approach to safeguarding. Their training should be regularly updated. (KCSIE 2022, paragraph 81).

p) The Proprietor and the Safeguarding Managing Director will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their multi-agency safeguarding arrangements.

Managing Directors of non-public entities however do not have to follow requirement as laid down in the Public Sector Equality Duty (PSED). (KCSIE 2022, paragraph 82).

13. Director of Dukes Plus

The Director of the Dukes Plus is Mr Ricky Tavares.

His role alongside the Safeguarding Managing Director is to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place within **A-List Education** are effective and support the delivery of a robust approach to safeguarding. Their training should be regularly updated. (KCSIE 2022, paragraph 81).

The Director of Dukes Plus will also ensure through liaison with **A-List Education's** HR Executive that:

- Robust safer recruitment processes are in place.
- Administration and management of all pre-employment checks are in place for all staff employed within our company and relevant employment documentation regarding staff checks are checked before staff start work and are maintained effectively in manual or electronic HR files.
- Ensure that any child protection files are maintained as set out in Annex C of **KCSIE 2022**.
- Ensure through liaison with the Director of **A-List Education** that all staff have completed appropriate induction and update training on Safeguarding and Child Protection.

14. Director of A-List Education

The Director of **A-List Education** plays a vital role in ensuring the welfare, health, and safety of all young people in their care.

Further responsibilities include:

- Facilitate a whole-site approach to safeguarding and child protection to ensure that welfare, health, and safety procedures underpin all aspects of process and policy development.
- Ensure all children, young people and students are provided with a safe and caring environment, their concerns are listened to and acted upon in a swift and timely manner.
- Ensure any concerns of a welfare or safeguarding nature are acted upon in a swift and timely manner, liaising with external statutory agencies and multi-agency partners including LADOs, police, MASH, Single Point of Access.

- Ensure they meet their safeguarding and child protection responsibilities as detailed in their own safeguarding and child protection policy.
- Regular liaison with the Director of Dukes Plus, Mr Ricky Tavares with any concerns of a welfare or safeguarding nature which meet the thresholds for referral.
- Ensuring that all staff are recruited using safer recruitment procedures and records of checks made before employment are maintained in HR files or electronically to meet minimum regulatory requirements.
- Ensure a single central register or a manual log is kept for their setting and maintained appropriately meeting regulatory requirements of all staff checks required pre-employment.
- Ensure all policies and procedures relating to the welfare, health, and safety of young people in their care are kept up to date, reviewed regularly and are implemented effectively paying due regard to Keeping Children Safe and Education Sept 22.

15. The Group Compliance Director

The Group Compliance Director is Mr Geoff Marston and is supported by Dukes Education Compliance Director (Colleges).

Responsibilities include:

- Advising and supporting the Dukes Executive Board regarding meeting minimum regulatory compliance to The Education (Independent School Standards) Regulations 2014, National minimum Standards for Boarding 2022 and relevant aspects of the Early Years Foundation Stage 2021 regulations.
- Advising and supporting senior leaders across all the Dukes' educational businesses to ensure they are meeting minimum regulatory compliance and effective implementation of policies and procedures across all aspects of welfare, health and safety in ensuring the welfare of children and young people and care.
- Ensure any issues of non-compliance are made aware to the Director of Dukes Plus and an appropriate action plan is drawn up and implemented.
- Support the Director of Dukes Plus with any investigations alongside our Designated Safeguarding Lead as required.

16. The Compliance Director (Colleges)

The Compliance Director for Colleges is Mr Paul Ludlow and is supported by the Group Compliance Director.

Responsibilities include:

- Advising and supporting senior leaders across the Dukes Plus Brands to ensure they are meeting the Dukes standard for the safeguarding and child protection of our children and young people as well as any relevant minimum regulatory compliance to The Education (Independent School Standards) Regulations 2014, National minimum Standards for Boarding 2022 as well as the Independent School Standards (Wales) Regulations 2003.

- Advise and support on next steps for any allegation if further support is needed by senior staff in **A-List Education**.

17. Young People with special educational needs and disabilities (SEND)

Staff are made aware that young people with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse including those with physical health issues. Such young people are also more prone to peer group isolation or bullying.

Staff will be aware that:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration as it might be due to abuse taking or have taken place.
- children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs.
- communication barriers may exist and difficulties in overcoming these barriers.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND in **A-List Education**.

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

18. What to do when there are concerns or if a child makes a disclosure

It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer any concerns about a child
- keep clear written records
- listen to the views of the child
- reassess concerns if the child's situation does not improve
- share information quickly and challenge inaction

Staff see children regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive.

It is more common with primary aged children for concerns to arise about a child through staff observations and casual conversation rather than a child making a direct disclosure. There may also be a change a child or young person's or art or written work which may show signs of confusion or distress.

Staff should be aware that younger child or young persons may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns.

Concerns may also be raised about a parent/carer's interaction with a child or young person or issues such as parental alcohol misuse, domestic abuse, or mental health. If there is any concern at all the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.

Appendix 1 of this policy gives details of some of the types of abuse and safeguarding issues with which staff should be familiar.

19. Procedures if staff have a concern about a child or young person

If a member of staff is concerned about a child or young person the matter should be referred **immediately** to the DSL, or the Deputy in the DSL's absence.

Staff may speak directly to the DSL or Deputy DSL first to discuss their concerns about a child or young person.

If anyone of the safeguarding team is unavailable then staff can also speak with Mr Paul Ludlow, Compliance Director (Colleges) on **07584 012130** but must then ensure they have also contacted the DSL or Director of Dukes Plus, Mr Ricky Tavares **07793 203912** if Paul is unavailable.

In either case, reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day (also see later section on recording concerns).

20. Procedures for staff if a child or young person discloses information

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

The member of staff should:

- Listen carefully and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. When the child or young person has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.
- Abuse that occurs online or outside of the any company event or online service should not be downplayed and should be treated equally seriously. A victim will never be given the impression by our staff that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Our staff will explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them. (KCSIE 2022, paragraph 468).
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with

children and young people which facilitate communication. (KCSIE 2022, paragraph 19)

- Do not promise confidentiality. Explain that you have to make sure that the young person is safe, and you will need to ask other adults to help you to do this.
- Do not cross question the child or young person. You must not ask leading questions, that is, a question which suggests its own answer. Let the young person tell you what he or she wants to and no more. The young person may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- Be prepared to follow up with the young person, but only in conjunction with advice from the DSL.
- Be aware that younger children may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- Do not attempt any examination or remove a young person's clothes to look further at an injury. Under no circumstances should photographs be taken of a young person's injury. It may be possible to observe the young person during the normal daily routine, for example in an outdoor team skills exercise.
- If a young person wants to show you his or her injuries, **please try and insist that this must wait for a health professional to make an assessment. No child or young person should be asked to undress to show their injuries to a member of staff.**
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL.
- If a concern or disclosure involves technology or online images staff must follow the specific advice in this policy.

21. Mechanisms for Young People to report concerns

A-List Education has a strong pastoral system and promotes an ethos where young people feel safe to share information about anything that is worrying them. **A-List Education** provides a child or young person 'a voice' and encourages children or young persons to develop the rules and boundaries of acceptable behaviour.

22. Support for staff

A-List Education recognises that staff who have become involved with a child or young person who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

Our company will support such staff by providing an opportunity to talk through their anxieties with the DSL and will seek further support as appropriate.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call **0800 028 0285** or email help@nspcc.org.

23. Recording Safeguarding Concerns

a) Abuse and neglect are complex issues and are rarely standalone events; therefore, they require a culture of vigilance, professional insight, and respectful challenge, as well as effective recording, reporting and monitoring systems.

- b) The DSL and Deputy DSL have full access to company Safeguarding Records to enable them to record actions and store all safeguarding records securely.
- c) If the DSL is not available for any reason the Deputy DSL must be contacted to deal with the concern initially.
- d) With regard to any conversations directly with a child or young person or overheard, staff must keep a written record of the conversation and concerns arising.
- e) The record should include the date, time, and place of the conversation, who was present and what was said by the child or young person. The record should use names, not initials, for all references to people.
- f) The record should be specific. Record actual behaviour and language used by a child or young person rather than more vague terms such as inappropriate language/behaviour.
- g) Staff should make the record as soon as possible after speaking to the child or young person so the child or young person is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the child or young person's own words.
- h) The record should contain facts and information only, taking care to avoid personal opinion.
- i) Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
- j) If more than one member of staff is present when a child or young person discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report.
- k) The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.
- l) It is important to record all concerns regarding the welfare of child or young persons, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.
- m) Staff must not investigate further or speak to parents or other staff. They must contact the DSL who will then determine the next course of action.

24. DSL Action on receipt of a concern about a child

On receipt of the safeguarding report, the DSL must record the decisions made and action taken.

Action will depend on the nature of the concern. It may include one or more of the following:

- (a) monitoring the child or young person at Head Office or the venue being used.
- (b) a discussion with parents – **if this does not place the child at greater risk of harm after they have disclosed.**
- (c) early help intervention from the child's own school and/or another agency
- (d) referral to Children's Services

- (e) referral to the LADO
- (f) report to the police

The member(s) of staff making the report will be informed by the DSL of the action taken.

If the child or young person's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

25. Preserving evidence

- a) All evidence (which could include a child or young person's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.
- b) If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- c) Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.
- d) If the imagery has already been viewed by accident (e.g. if a child or young person has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- e) Do not delete the imagery or ask the child or young person to delete it.
- f) Do not ask the child or young person(s) involved in the incident to disclose information regarding the imagery.
- g) Do not share information about the incident with other members of staff, the child or young person(s) it involves or their, or other, parents and/or carers.
- h) Do not say or do anything to blame or shame any child or young person(s) involved.
- i) Do explain that you need to report it and reassure them that they will receive support and help.
- j) Report the matter to the DSL immediately.

26. Child protection records

- a) Safeguarding records are kept securely on **a restricted section of the A-List's secure file storage: Sharepoint.**
- b) There is a clear, detailed chronology for each child or young person where concerns have been raised.
- c) Written records are kept of all concerns, whether or not there is a need to refer the matter to Children's Services or another agency.
- d) If a referral to Children's Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents.
- e) All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing.

- f) Safeguarding Children Partnership has its own referral form which must be completed if a formal referral is made by the DSL. A copy of the referral form sent to the local authority must be retained.
- g) Minutes of any case conferences or discussions with social workers or other professionals involved with the child or young person will be retained in the child or young person's file.
- h) Any new concern or information about a child or young person who has active involvement with Children's Services must be passed to the child or young person's allocated social worker without delay.
- i) Any new concern or information about a child or young person who has had previous involvement with Children's Services must be passed to Children's Services without delay.
- j) If a child or young person returns to their school / college, all child protection records are transferred securely, within 5 days, to the DSL at their school / college and a receipt is obtained confirming they have been received. Parental permission is not required for records to be shared with the child's school / college.
- k) On a case-by-case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the child or young person's needs and can have any support in place when the child or young person arrives.

27. Information sharing

Information will be shared according to the HM Government guidance Information Sharing (July 2018.)

The guidance states that practitioners should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a child or young person. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard child or young persons.

The guidance states that the information shared should be:

- (a) Necessary and proportionate - Any information shared must be proportionate to the need and level of risk.
- (b) Relevant - Only information that is relevant to the purposes should be shared with those who need it.
- (c) Adequate - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- (d) Accurate - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- (e) Timely - Information should be shared in a timely fashion to reduce the risk of harm.
- (f) Secure - Wherever possible, information should be shared in an appropriate, secure way.
- (g) Record - Information sharing decisions should be recorded whether or not the decision is taken to share.

Practitioners may share information, without consent when there is a good reason to do so, and the sharing of that information will enhance the safeguarding of that child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent and if to gain consent would place a child at risk. (KCSIE 2022, paragraph 118).

28. Communication with parents/carers

- a) All parents are aware from publication of this policy on **A-List Education's** website that the company has a safeguarding policy and is required to follow statutory guidance in respect of reporting to Children's Services any case of suspected abuse.
- b) From this policy, parents are made aware of the identities of the DSL and Deputy DSL with whom they may discuss concerns.
- c) **A-List Education** will work with parents and outside agencies to help support child or young persons and their families; however, it will always put the duty of care to the **young person** as its priority and will refer concerns if it considers a child or young person is or may be at risk of harm or has suffered harm.
- d) The DSL will normally request a meeting with the parents of the child or young person about whom there are concerns to discuss the matter. He/she will explain the reasons for the company's concerns and the course of action the school intends to take.
- e) Referrals to Children's Services or the LADO (or initial advice from either service) **do not require prior parental consent**. The DSL must act in the best interests of the child or young person, even if this results in making a referral against the parents' wishes.
- f) If the DSL believes that notifying parents might in any way exacerbate the problem, increase the risk to the child or young person or if there are any other extenuating circumstances, initial advice will be sought from Children's Services prior to notifying the parents. This may result in an immediate referral to Children's Services without parents being notified.
- g) If there is an allegation which involves a member of staff, parents will only be informed after the school has consulted with the LADO and has obtained the LADO's consent.
- h) If a parent has any safeguarding concerns, he/she should contact the school's DSL as soon as possible.

29. Referrals to Children's Services and/or other agencies

Referrals about an individual child or young person must be made to the borough in which the child or young person resides. However, advice may always be obtained from the Children's Services department of the school's local authority, regardless of where the child or young person resides.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is **made immediately**. Referrals should follow the local referral process. (KCSIE 2022, paragraph 59).

The DSL follows the Levels of Need thresholds from **London's** Safeguarding Children Partnership (**SCP**) when decisions are made about making referrals.

Available here: <https://www.londonscb.gov.uk/contacts/safeguarding-contacts/>

There are 4 levels.

1. No referral required
2. Child in need of Early Help (Early Help Assessment)
3. Child in need of targeted or specialist support (Referral to MASH)
4. Child at risk of significant harm (Urgent referral to MASH)

A-List Education will ensure as a relevant agency that it should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as apart of “local arrangements”.

Our DSL / DDSL will be familiar with London’s Safeguarding Children Partnership local threshold document. (KCSIE 2022, paragraph 492).

30. Early Help

Early help means providing support as soon as a problem emerges at any point in a child’s life. Where a child would benefit from coordinated early help, an early help inter-agency assessment will be arranged. Chapter 1 of Working Together to Safeguard Children (Department for Education, September 2018) provides detailed guidance on the early help process.

Additional support systems in school may form part of early help strategies e.g. additional pastoral support, school mentors, support from a counsellor and should feed into Local Authority early help measures as required.

Evidence is kept of all early help interventions.

Any child or young person may benefit from early help, but KCSIE recommends that all staff should be particularly alert to the potential need for early help for a child or young person who:

- (a) is disabled and has specific additional needs
- (b) has special educational needs (whether or not they have a statutory education, health and care plan)
- (c) is a young carer
- (d) is frequently missing/goes missing from care or home
- (e) is misusing drugs or alcohol
- (f) is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- (g) has returned home to their family from care.

31. Westminster Local Authority Threshold Levels 3 and 4

a) Children or young persons who meet the threshold of Level 3 or Level 4 will be referred to MASH immediately by the DSL.

- b) If there is ever any doubt about whether a referral should be made advice will be sought from the **Westminster Local Authority** Safeguarding Advisor or from the MASH team.
- c) The DSL may also take initial advice and discuss matters with other services such as the Education Welfare Officer, CAMHS or the police. Under no circumstances will the situation be left beyond the day that the concern is first raised.
- d) If a referral is made or advice is obtained from Children's Services, the safeguarding governor will be informed of the case by the DSL as soon as possible.
- e) All telephone conversations with Children's Services, the LADO or other local authority officers are recorded by the DSL.
- f) The DSL will discuss the concerns with the child or young person's parents/carers at the earliest appropriate opportunity.
- g) The DSL will assist other agencies to make enquiries into concerns about a child or young person's welfare. This will include ensuring that the school is represented at multi-agency meetings, including child protection conferences, and that reports/information about the child or young person are provided as required.
- h) In cases of extreme emergency or if a serious criminal offence appears to have been committed **the police will be contacted immediately.**
- i) The referral process outlined is also followed when there are concerns about a child or young person who may be at risk of radicalisation. The level of risk will identify the most appropriate referral, which could include Children's Services and/or **Channel**.

(Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.)

The policy of the company requires that all referrals are made by the company's DSL; however, **anybody can make a referral** and in exceptional circumstances staff may raise concerns directly with Children's Services.

If, at any point, there is a risk of immediate serious harm to a child or young person a referral should be made to Children's Services or the police on 999 immediately.

32. Safer recruitment

A-List Education follows statutory guidance for the safer recruitment and employment of staff who work with children as set out in Part Three of KCSIE and Disqualification under the Childcare Act 2006 (September 2018). Please also see our Recruitment policy.

All staff are checked as to their suitability. These checks include:

- (a) The taking up of references
- (b) Verification of identity
- (c) Verification of right to work in the UK
- (d) Where appropriate, verification of qualifications
- (e) Where appropriate, overseas police checks
- (f) (A satisfactory enhanced check with the Disclosure & Barring Service (DBS), including a Barred List check for staff engaged in regulated activity
- (g) A self-declaration to ensure compliance with disqualification regulations made under the Childcare Act 2006

(h) Where appropriate, an overseas criminal record check(s)

In some circumstances, and as long as specific criteria are met, a newly recruited member of staff may, if closely supervised, begin work without an enhanced DBS certificate or overseas police clearance. The conditions applicable are set out in the **Recruitment Policy** and include a requirement for all other checks to be completed, including a Barred List check. The **Director of A-List** will also complete a DBS Risk Assessment reviewed fortnightly until the DBS certificate is received and, if applicable, the overseas police clearance is also received.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years.

In addition, as part of the shortlisting process, the company will consider carrying out an **online search** as part of their due diligence on the shortlisted candidates.

This may help identify any incidents or issues that have happened, and are publicly available online, which the company might want to explore with the applicant at interview. (KCSIE 2022, paragraph 220).

33. Visiting Speakers

Visiting speakers are always vetted and staff must obtain permission from the **Director of A-List Education** for any speakers to visit the venue being used or invited online to speak. As they will be always supervised, a DBS or barred list check will not be required, unless it is deemed, they may be undertaking regulated activity.

Suitable online research might include a review of the visiting speaker's website or company information held at companies house, news articles of their visits to other organisations, comments made on www.mums.net and should be limited to the suitability of them to present / undertaken tasks to **young persons**.

34. Staff Induction

The DSL is responsible for ensuring that all new members of staff working in **A-List Education**, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to the new member of staff starting work with the children.

All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:

- Keeping Children Safe in Education, Part 1 and **Annex A. (and Annex B if they work directly with children)**
- **Safeguarding Policy**
- **Staff Code of Conduct Policy**
- **Acceptable Use of ICT Policy**
- **Employee Handbook**
- **Anti-bullying Policy**
- Prevent training

- Procedures on managing children who go missing from education (**Missing Child Policy**)

A-List Education takes a risk-based approach to the level of information provided when training other temporary staff, staff running clubs, contractors and volunteers.

35. Staff Training

- a) All staff are required to read, at least annually, the Safeguarding Policy (i.e. this policy) and the Staff Code of Conduct and must confirm that they have done so.
- b) All staff are required to read and understood the guidance for staff in Part 1 and **Annex A** of KCSIE and confirm that they have done so.
- c) Every member of staff receives comprehensive training in safeguarding (including on-line safety) at least every three years, in line with advice from the **London SCP**. Refresher training is provided annually and on specific issues through the year as required.
- d) Staff will also receive regular informal updates on safeguarding and related issues as and when required through bulletins and staff meeting announcements from the DSL or if local circumstances warrant.
- d) All staff are trained in how to listen, respond to and report any disclosures including those which involve **child-on-child** sexual violence or sexual harassment.

36. DSL and DDSL Training

The DSL and Deputy DSL undergo training at a minimum every two years, which includes training in inter-agency working in line with **Annex C** of KCSIE. They have updates, at least annually, on specific issues as required.

37. Managing Director Training

The Board of Governors will ensure that **ALL** Managing Directors and proprietors receive appropriate safeguarding and child protection (including online) training at induction.

This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole company approach to safeguarding. Their training will be regularly updated. (KCSIE 22, paragraph 81).

The Managing Director responsible for safeguarding has received safeguarding training specifically for governors and undertakes refresher training every two years, as a minimum.

38. Acceptable Use of technology

(Acceptable Use of ICT policy)

- a) Staff must not take video footage or photographs of child or young persons except for company purposes.
- b) Any such images must not be placed in the public domain without the permission of the **Director of A-List Education**.

c) Company devices should be used wherever possible.

If a **personal device is used**, photographs or videos of child or young persons must not be stored or retained on personal cameras, mobile phones, or other devices. Any images must be uploaded to the company's file server as soon as possible and permanently deleted from the personal device.

d) Permitted images are stored securely on a password-protected section of the company's intranet. They are deleted when no longer required.

e) Cameras, mobile phones, or other photographic devices are not allowed in any areas where child or young persons may be washing or changing, nor should photography be used in a manner that may offend or cause upset.

f) Parents / carers are asked to restrict photography whether on cameras, mobile phones, or other devices to major events published in the company calendar only. General filming at the venues used by **A-List Education** by parents / carers is never permitted.

g) Parents / carers should be aware that other parents of young people attending the event or using the service may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and should not be shared on social media.

h) Other visitors, volunteers and contractors in **A-List Education** not permitted to take photographs in any area of the event without specific permission from the Director of **A-List Education**.

i) The general use of mobile telephones in all areas of the **event** (calls, texting and email) by parents is not permitted.

j) Staff may only communicate with child or young persons through the company's email system and the designated apps used by older child or young persons for homework.

k) Staff must not use their mobile phones or other personal devices for calls or messaging when engaged with child or young persons and all devices must be out of sight.

39. Staff Code of Conduct

The Staff Code of Conduct gives comprehensive, clear guidance on the expected behaviour of **all adults** in our company. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by child or young persons or others and report any conduct by an adult which raises concern. Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken.

Those staff who are involved in the provision of residential care, must ensure that they are not under the influence of **alcohol or drugs** when on duty. The **DSL** will ensure appropriate action is taken and inform the **Director of A-List Education** immediately if there is a suspicion or staff have reported to them that they know someone to be under the influence of either substance. Any concerns by staff must be raised with the **Director** in the first instance or the **Dukes Plus Director, Mr Ricky Tavares** if the **Director of A-List Education** is unavailable.

40. Whistleblowing

It is recognised that child or young persons cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, which may include the attitude or actions of colleagues. All members of the our community have a duty to protect children and should they have concerns must make these concerns known to the **Director of A-List Education**.

Please also see our Whistleblowing Policy as well as advice on low-level concerns in sections 25 and 42.

41. Allegations against staff

As part of its overall safeguarding ethos, the company ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the company (including self-employed staff, supply teachers, volunteers and contractors).

All members of staff must follow the **Staff Code of Conduct** and conduct themselves in a professional manner at all times, both to ensure the safety of the child or young persons, and to reduce the risk of any allegation of improper behaviour.

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the company will follow the guidance in Part 4 of KCSIE and the procedures of **London's Safeguarding Children Partnership (SCP)**.

Allegations that might indicate that a person is unsuitable to work with children are where a person 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.

The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the company, regardless of whether the company, is where the abuse is alleged to have taken place and regardless of whether it involves child or young persons at this company.

Please note that all other concerns about members of staff should be reported through the organisation's **Whistleblowing procedures**.

If in any doubt, please speak with the **Director of A-List Education** in the first instance.

42. Reporting an allegation or concern

- a) Staff must never think that abuse by an adult is not possible in our company, or immediately disbelieve an accusation against someone who is known well and trusted.
- b) A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the **Director of A-List Education** is the one against whom the allegation is made.

c) An allegation against the **Director of A-List Education** should be reported to the Director of Dukes Plus, Mr Ricky Tavares and then in his absence Safeguarding Managing without notifying the **Director** first.

d) In the absence of the **Director of A-List Education**, an allegation against a member of staff must be reported to the Director of Dukes Plus and / or Safeguarding Managing Director and in their absence the **Chairman of Dukes Education, Mr Aatif Hassan**.

The Dukes Education Compliance Director (Colleges), Mr Paul Ludlow can also be spoken to for advice or if there is a perceived conflict of interest in reporting an allegation.

e) The **Chairman of Dukes Education, Mr Aatif Hassan**, can also be **contacted directly** and without hesitation. He will then contact the LADO immediately for further advice.

f) Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

43. Procedures & Informing the Local Authority Designated Officer (LADO)

a) If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a child or young person is in immediate danger, a referral to Children's Services and/or the police **MUST** be made immediately.

b) An allegation of abuse by an adult will always result in a senior person from the company (as detailed above) contacting the LADO of **London's** Safeguarding Children Partnership (SCP), who will advise on the next steps to be taken.

c) **Under no circumstances will the company conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken.**

Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.

d) There are two aspects to consider when an allegation is made: -

- Look after the **welfare of the child** - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.

- Investigate and support the person subject to the allegation - the case manager (usually the **Director**, unless the **Director** is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

e) The company's aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.

f) The **Director** will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a child or young person has made an allegation, a written note of what the child or young person has said will be made by the member of staff to whom the child or young person made the allegation.

g) The **Director** will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.

h) Any allegation against employed staff or volunteers, including those considered borderline, must be reported and discussed with the LADO without delay, and **within one working day**.

i) An initial assessment of any allegation referred will be made by the LADO and the **Director**. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the company's **low-level concerns procedures (see section 46 of this document)**.

j) Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and
- agree on what information should be put in writing to the individual concerned and by whom.

k) Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the **Director**.

If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.

l) In the case of a referral and investigation, the **Director** must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.

m) Where there are no objections from the investigating agencies, the **Director** will:

- inform the person making the allegation and explain the likely course of action
- ensure the parents of the child or young person(s) who is the alleged victim have been informed about the allegation and the likely course of action
- inform the member of staff against whom the allegation is made and explain the likely course of action
- keep a written record of the above.

n) The **Director** in consultation with the LADO, will make the decision whether or not to suspend the member of staff involved.

o) If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. *The Education Act (2011)* prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.

p) The **Director** will take advice from the LADO, the Safeguarding Managing Director and other agencies to agree:

- Who needs to know and exactly what information can/cannot be shared
- How to manage speculation and gossip
- What, if any, information can be given to the wider community to reduce speculation

- If necessary, how to manage the press.

q) **A-List Education** has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.

r) The following definitions will be used when determining the outcome 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.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

s) Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.

t) Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

Both the **DSL** and **Director** will ensure that all staff should expect to support social workers and other agencies following any referral.

44. Allegations relating to third party contractors

The company's procedures for managing allegations against staff above also apply to staff not directly employed by the company, for example, contractors provided by an employment agency or business ('the agency'). The company will usually take the lead, but agencies/ third party employers will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will the company decide to cease to use a contractor due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

The company will discuss with the agency whether it is appropriate to suspend the supply teacher an investigation is carried out but this decision rests with the **Director**, and the LADO.

45. Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If the company ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

This will also include anyone who would have been dismissed if they had not resigned first.

For teaching staff, the company also has a legal responsibility to report the matter to the the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in misconduct: the prohibition of teachers (October 2015). Further guidance is published on the TRA website - <https://teacherservices.education.gov.uk/>

46. Low-Level Concerns

a) A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of **our** company may have acted in a way that is inconsistent with the **Staff Code of Conduct**, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

b) A member of staff may have doubts about the behaviour of another adult towards a young person, or another child, or concerns about how their own behaviour might be interpreted.

For elimination of any doubt a "young person" is defined as someone up to the age of 18 years or someone with special needs in your care up to the age of 25 years.

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

- being over friendly with young people.
- having favourites
- taking photographs of young people on their mobile phone/other device
- engaging with a young person on a 1:1 basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language,
- Email, messaging, use of social media sites or other communication between adults and young people outside agreed protocols
- Any incident where he/she feels that his/her actions or behaviour towards a young person or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

d) Staff must report any low-level concerns whatsoever to the **Director of A-List Education** or Director of Dukes Plus, Mr Ricky Tavares.

The **Director of Dukes Plus, Mr Ricky Tavares** will be the ultimate decision maker in respect of all low-level concerns. The **Director of Dukes Plus** may wish to consult with the **Director of Compliance (Colleges)** and take a more collaborative decision-making approach if the need arises. (KCSIE 2022, paragraph 432).

e) Staff are also encouraged, and to feel confident if the need arises, for them to **self-refer**, where, for example, they have found themselves in a situation which could be misinterpreted,

might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

f) When a low-level concern has been raised by a third party, the **Director of A-List Education** will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.

g) **A-List Education** will also consider if any wider issues within its company which has enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

h) All low-level concerns will be recorded in writing. The record will include:

- details of the concern.
- the context in which it arose.
- evidence collected by the **Director of A-List** where the concern has been raised via a third party.
- the decision categorising the type of behaviour.
- action taken.
- the rationale for decisions and action taken.
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)

i) Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

j) Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the **Director of A-List Education** will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

k) The purpose of low-level reporting is to protect both young people and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

l) Low-level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified. (KCSIE 2022, paragraph 433).

m) A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the company's **Whistleblowing procedures**.

n) If there is any doubt as to whether a low-level concern meets the harms threshold, then the **Director of A-List Education** will consult with the LADO. (KCSIE 2022, paragraph 434).

47. Non-recent / Historical allegations

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

Where an adult makes an allegation to the company that they were abused as a child, the individual will be advised to report the allegation to the police.

Non-recent / historical allegations made by a child, will be reported to the LADO in line with London's **Safeguarding Children Partnership (SCP)** procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

48. Managing Director and Proprietorial Oversight

Annual reports are sent to the **Director of Dukes Plus** and **Safeguarding Managing Director** where we discuss all safeguarding issues, and they will review the data breakdown logged on the company's **file storage** system.

In addition, the **Director of A-List Education** speaks to both the **Safeguarding Managing Director** and **Director of Dukes Plus** about any concerns.

Should the company need to make a referral the Director of Dukes Plus and Safeguarding Managing Director will be immediately informed.

The SCR is checked by the safeguarding lead at Dukes Education as well as periodically by the Safeguarding Governor and DSL.

49. Other documents informing the policy

1. Safer Recruitment Consortium '*Guidance for safe working practice for those working with children and young people in education settings*' (**Feb 2022**)

<https://saferrecruitmentconsortium.org/>

2. DfE guidance '*Teaching online safety in school*' (June 2019)

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

3. *Mental health and behaviour in schools*: departmental advice (**June 2021**)

<https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges>

4. *When to call the police*, non-statutory guidance from the National Police Chiefs' Council

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20police%20guidance%20for%20schools%20and%20colleges.pdf>

5. DfE advice '*Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*' (July 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

7. DfE *Searching Screening and Confiscation Advice for schools* - (**Sept 2022**)

<https://www.gov.uk/government/publications/searching-screening-and-confiscation>

8.UKCIS Education Group: *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (2020)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

9.*Designated teacher for looked after children* (February 2018)

<https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children>

10. Counselling in schools: *a blueprint for the future* (February 2016)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf

11. UK Council for Internet Safety (UKCIS) guidance: *Education for a connected World – updated 2022*

<https://www.gov.uk/government/publications/education-for-a-connected-world>

12. The UKCIS **external visitors' guidance** will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

<https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings>

13. National Crime Agency's CEOP education programme: Thinkuknow

<https://www.thinkuknow.co.uk/>

14. Public Health England: **Every Mind Matters** – Sept 2020

<https://www.gov.uk/government/news/public-health-england-launches-new-every-mind-matters-campaign>

15. Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. **Feb 2021**

[Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes)

16. London Grid for Learning – undressed guidance,

[Undressed \(lgfl.net\)](https://www.lgfl.net/undressed)

17. Force Marriage Unit resources

[Forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/forced-marriage)

18. Forced Marriage – The Right to Choose – 28th July 2022 updated guidance.

[The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/the-right-to-choose)

19. County Lines – disruption toolkit – 19th July 2022

[Child exploitation disruption toolkit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit)

20. Operation Encompass

The helpline is available 8AM to 1PM, Monday to Friday on **0204 513 9990** (charged at local rate).

[Home : Operation Encompass](#)

50. **APPENDIX 1**

Categories of abuse and Specific Safeguarding Issues

(i) **Definitions of Abuse**

All company staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Some staff may feel that the content of this appendix does not apply to them due to the age - range and nature of activity described.

However, all staff must be prepared to act on disclosures from any child or parent / carer which may be occurring or witnessed outside of their organisation.

Adults or young people from within or outside of their organisation may also commit inappropriate acts which are or can cause risk of harm to young people. Therefore, information in this section is deemed relevant to be read and understood by all.

It is therefore essential that all staff are familiar with the rest of the information contained in this policy and assume it would never occur in their establishment and if any doubt refer anything reported to the DSL in the first instance.

KCSIE 2022 provides an updated definition of abuse as:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

KCSIE Sept 2022 also states the following:

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

The DSL will ensure that all staff are aware of the signs of abuse. The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked.

Any concerns, whether they are listed below or not, should be brought to the attention of the DSL immediately. The following signs are not conclusive evidence but may be a warning, particularly if a child or young person exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a child or young person showing such signs.

Categories of Abuse

The main categories of abuse outlined in KCSIE, are

- (a) Physical abuse
- (b) Emotional abuse (including domestic abuse)
- (c) Sexual abuse
- (d) Neglect

(ii) Risk factors

In an abusive relationship the child may

- (a) appear frightened or wary of the parent/s or other adult
- (b) act in a way that is inappropriate to her/his age and development, although full account needs to be taken of different patterns of development and different ethnic groups.

The parent or carer may

- (a) persistently avoid child health promotion services and treatment of the child's episodic illnesses
- (b) have unrealistic expectations of the child
- (c) frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- (d) be absent or misusing substances
- (e) persistently refuse to allow access on home visits
- (f) be involved in domestic violence.

Staff should be alert to changes in a child or young person's behaviour if there is a new carer (e.g., nanny or au pair) in the child or young person's home.

(iii) Recognising signs of physical abuse

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.

The following are often regarded as indicators of concern:

- (a) an explanation which is inconsistent with an injury
- (b) several different explanations provided for an injury
- (c) unexplained delay in seeking treatment
- (d) the parents/carers are uninterested or undisturbed by an accident or injury
- (e) parents are absent without good reason when their child is presented for treatment
- (f) repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- (g) family use of different doctors and A&E departments
- (h) reluctance to give information or mention previous injuries
- (i) two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- (j) repeated or multiple bruising on the Head or on parts of the body unlikely to be injured accidentally
- (k) variation in colour, possibly indicating injuries caused at different times
- (l) the outline of an object used, e.g., marks from a belt or a hairbrush, or of a handprint
- (m) bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- (n) bruising around the face
- (o) grasp marks on small children
- (p) bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
- (q) bite marks
- (r) circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- (s) scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
- (t) scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath
- (u) medical attention is sought after a period of delay when a fracture has caused symptoms such as swelling, pain or loss of movement.

(iv) Recognising signs of emotional abuse

Another form of abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development.

It may involve conveying to a child or young person that he or she is worthless or unloved, inadequate, or valued only insofar as meeting the needs of another person. It may include not giving the child opportunities to express his or her views, deliberately silencing the child or

'making fun' of what he or she says or how the child communicates. It may feature age or developmentally inappropriate expectations being imposed on the 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. It may involve seeing or hearing the ill-treatment of another, including domestic violence.

It may involve serious bullying (including cyberbullying), causing the child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

- (a) developmental delay
- (b) abnormal attachment between a child and parent/carer, e.g., excessive anxiety on the part of either
- (c) indiscriminate attachment or failure to attach
- (d) aggressive behaviour towards others
- (e) scape-goated within the family
- (f) frozen watchfulness, particularly in pre-school children
- (g) low self-esteem and lack of confidence
- (h) withdrawn or seen as a "loner" – difficulty relating to others
- (i) reverting to younger behaviour
- (j) depression, withdrawal
- (k) fear of academic failure or 'getting things wrong'.

For further information on bullying, including cyber bullying, please see the company's **Anti-bullying Policy**.

(v) Recognising signs of sexual abuse

Sexual abuse (KCSIE, paragraph 25) 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 the outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the

internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (see KCSIE, Part Five).

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are

- (a) inappropriate sexualised conduct
- (b) sexually explicit behaviour, play or conversation, inappropriate to the child or young person's age
- (c) continual and inappropriate or excessive masturbation
- (d) self-harm (including eating disorders), self-mutilation and suicide attempts
- (e) involvement in prostitution or indiscriminate choice of sexual partners
- (f) an anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- (a) pain or itching of genital area
- (b) blood on underclothes
- (c) pregnancy in a younger girl where the identity of the father is not disclosed
- (d) physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation.

(vi) Signs of neglect

Neglect may be defined as 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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to

- (a) provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- (b) protect a child from physical and emotional harm or danger
- (c) ensure adequate supervision (including the use of inadequate caregivers)

- (d) ensure access to appropriate medical care or treatment.
- (e) be responsive to a child's basic emotional needs.

The following may be indicative of neglect of a child:

- (a) the child is dirty, smelly, poorly clothed or appears underfed
- (b) the child has lingering illnesses which are not attended to
- (c) there is a marked deterioration in schoolwork
- (d) the child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums
- (e) an air of 'detachment' or a 'don't care' attitude
- (f) overly compliant behaviour
- (g) a child who is reluctant to go home or is kept away from school for no apparent reason
- (h) 'tummy pains' with no medical reason
- (i) running away from home, suicide attempts
- (j) extreme anger, sadness or depression
- (k) child left with adults who are intoxicated or violent
- (l) child left alone for excessive periods
- (m) child thrives away from home environment.

(vii) Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents.

Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing.

This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

(viii) Specific safeguarding issues

Further safeguarding issues of which staff should be aware are detailed below.

Extensive guidance on a wide variety of specific issues can be found in **Annex B of KCSIE** and in other guidance listed at the end of this policy.

- Child abduction and community safety incidents
- children missing from education – also see Attendance Policy
- children and the court system
- Children missing from education
- Children with family members in prison
- child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)domestic abuse
- fabricated or induced illness
- Homelessness
- so-called 'honour based' abuse, female genital mutilation (FGM) and forced marriage
- mental health
- **child-on-child** abuse including: Nudes/semi-nudes, youth produced sexual imagery
 - sexual violence and sexual harassment
 - up-skirting
 - Online behaviour and cybercrime
- private fostering
- Preventing radicalisation (including Channel)

Guidance and practical support on specific safeguarding issues or concerns will be sought where necessary by the DSL.

The DSL will ensure that staff are aware of specific issues including, but not limited to: **child-on-child** abuse; sexual violence and sexual harassment; online abuse, including imagery; domestic abuse; parents affected by drug or alcohol abuse; child sexual exploitation, female genital mutilation; fabricated or induced illness; children missing education; preventing radicalisation; mental health

(ix) Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child.

Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

(x) Children and the court system

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

There are two age-appropriate guides to support children 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The company may refer some parents and carers to this service where appropriate.

(xi) **Children who go missing from education**

All child or young persons attending company events are recorded on the company's **admission register** and their attendance is recorded in the daily attendance register.

Staff must be aware that repeated absence may be an indicator of can be a potential indicator of abuse or neglect and repeated absence must be brought to the attention of the DSL.

All unexplained absences will be followed up in accordance with the company's **Missing Child Policy**.

If a child or young person who has current involvement with Children's Services is absent from any of the company's events the normal procedure of a first day call to the home will be followed.

The child or young person's social worker must be informed of all absences promptly, and immediately, if no response is received or if no adequate or credible reason is given for the absence.

The company holds contact details for both parents (unless a parent is deceased, or a parent has no contact with the child) and two emergency contact numbers.

(xii) **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

(xiii) **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a **young person** into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

A-List Education is aware that **often a young person** is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse.

Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- Inappropriate relationships:

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

- Boyfriend:

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

- Organised exploitation and trafficking:

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

(xiv) Child Criminal Exploitation (CCE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late,
- regularly missing school or education or not taking part in education,
- appearing with unexplained gifts or new possessions,
- associating with other young people involved in exploitation,
- having older boyfriends or girlfriends,
- suffering from sexually transmitted infections,
- mood swings or changes in emotional wellbeing,
- drug and alcohol misuse,
- displaying inappropriate sexualised behaviour.

(xv) Domestic abuse

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidences. The abuse can be but not limited to, psychological, physical, sexual, financial and emotional.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (**teenage relationship abuse**). All of which can have a detrimental long-term impact on their health, well-being, development, and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

The company will be mindful that children can often blame themselves for the abuse or may have had to leave the family home because of the abuse.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

(xvi) Extra-familial Harms

All our staff, but especially the designated safeguarding lead (and deputies) will consider whether children are at risk of abuse or exploitation in situations **outside their families**.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) **sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse)**, criminal exploitation, serious youth violence, county lines, and radicalisation. (KCSIE 2022, paragraph 23).

(xvii) Operation Encompass

When police are called to an incident of domestic abuse and there is a child(ren) in the household the police will usually inform the DSL of the school in which the young person is attending. This information may also get passed onto ourselves if the child or young person is on a day course or residential camp. This ensures that our company has up to date relevant information about the child's / young person's circumstances and can enable appropriate support to be given to them.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass **does not replace statutory safeguarding procedures**. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from

educational settings who may be concerned about children who have experienced domestic abuse.

The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate)

(xviii) Homelessness

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

The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

(xix) So called 'honour based' abuse (HBA)

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour.

Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

There is a statutory duty on teachers or educational professionals to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher or instructor / coach has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher / instructor / coach is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where the staff member suspects that a child or young person is at risk (i.e. where the staff member does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a child or young person over 18, our staff should follow our company's head office local safeguarding procedures, as well as contact the DSL of the school / college that the child or young person is attending.

(xx) Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A child or young person may have difficulty walking, sitting or standing and may even look uncomfortable. A child or young person may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.

There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the child or young person's return.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHCE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

(xxi) Mandatory Reporting of FGM

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure.

Under no circumstances should our company staff physically examine child or young persons.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101.

The report should be made immediately.

The duty to report should not be transferred to the DSL, however the DSL **must be informed**. Where there is a risk to life or likelihood of serious immediate harm the staff member should report the case immediately to the police, including by dialling 999 if appropriate.

(xxii) Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage which is common in many cultures. Forcing a person into a marriage is a crime in England and Wales.

(xxiii) Mental health

A-List Education has an important role to play in supporting the mental health and wellbeing of children and young people. Mental health problems can also, in some cases, be an indicator that a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Early intervention to identify issues and provide effective support is crucial. Our company's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole company's population, and equipping child or young persons to be resilient so that they can manage the normal stresses of life effectively.

This includes teaching children and young people about mental wellbeing through the curriculum and reinforcing this teaching through our company's activities.

- Identification: recognising emerging issues as early and accurately as possible
- Early support: helping child or young persons to access early support and intervention
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When staff suspect that a child or young person is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the child or young person's needs.
2. a plan to set out how the child or young person will be supported.
3. action to provide that support.
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on child or young persons.

These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care, or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents, or injuries.
- other traumatic incidents such as a natural disasters or terrorist attacks - Where children - experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression, and antisocial behaviour
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability, or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired because of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, because of traumatic experiences or persistent periods of abuse and neglect

- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder

Only appropriately trained professionals can make a diagnosis of a mental health problem.

Our staff, however, are well placed to observe children and young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have any concerns about the mental health of a child or young person, they should report this to the DSL immediately following the procedures outlined in this policy.

More information can be found in the DfE 'Mental Health and Behaviour in Schools' guidance.

Child-on-Child Abuse (formerly known as **Peer-on-peer abuse**)

Children are also vulnerable to abuse by their peers. **A-List Education** has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Staff will always challenge such behaviours.

Any child can be vulnerable to **child-on-child** abuse and staff should be alert to signs of such abuse amongst all children.

However, individual, and situational factors can increase a child's vulnerability to abuse by their peers. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable as may child or young persons with SEND or certain medical conditions. Children who are LGBT can also be targeted by their peers. In some cases, a child or young person who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

(xxiv) Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children.

In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns whenever needed.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and staff will be made aware of the range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse from the statutory guidance available. (KCSIE 2022, paragraphs 202 to 204).

All children involved whether victim or perpetrator will be treated as "at risk" and supported. The school recognises the gendered nature of **child-on-child** abuse and that it is more likely that girls will be victims and that boys will be perpetrators, but all **child-on-child** abuse is unacceptable and will be taken seriously.

Staff are made aware that **child-on-child** abuse may happen inside or outside school or online and that even if there are no reports in the school it does not mean **child-on-child** abuse is not happening, it may be the case that it is just not being reported. A member of staff

receiving an allegation of abuse by a child or young person, or with concerns about a child or young person, should report this immediately to the DSL following the reporting procedures outlined above.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include 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 and sexual harassment (see below and Part five of KCSIE)
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- 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
- up-skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission
- initiation/hazing type violence and rituals.

Where a child or young person may be asked to perform an act or series of inappropriate acts to gain membership to a group or partake in the wearing of a plastic bag over their head to allegedly heighten sexual experience before they pass out.

Through safeguarding training and anti-bullying training, staff will be made aware of the harm caused by **child-on-child** abuse and will follow the company's **Anti-bullying Policy** and safeguarding procedures as appropriate.

It may be appropriate to regard a young person's behaviour as abusive if:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned.
- the perpetrator has repeatedly tried to harm one or more other children.
- there are concerns about the intention of the alleged perpetrator.
- there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm

The DSL will not undertake any enquiry or investigation where a case is referred to Children's Services or to the police.

The initial assessment of any allegation will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the child or young persons involved, whether the allegation is demonstrably false or whether there has been inappropriate behaviour that can be dealt with through the school's usual disciplinary procedures.

The DSL will lead enquiries at company level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the child or young person making the allegation and explain the likely course of action. This will only happen if it is deemed not to put the child or young person further at risk.

If Children's Services or the police have been informed **A-List Education** will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will ensure the parents of the child or young person who is the alleged perpetrator are informed about the allegation and the likely course of action. If Children's Services or the police have been informed **A-List Education** follow the relevant agency's guidance about what information may be disclosed and to whom.

The necessary support and any required sanctions following **child-on-child** abuse will be determined on a case-by-case basis.

The **Director of A-List Education** will make the decision whether or not to suspend or exclude the child or young person(s) involved.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made

The management of young people with harmful behaviour (including sexually harmful behaviour) can be complex. **A-List Education** will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Appropriate support in **A-List Education** from outside agencies if applicable, will also be put in place for any victims or any other child or young person affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

If a child or a young person is found to have made malicious allegations, appropriate sanctions will be applied, which could include temporary or permanent exclusion.

(xxv) Strategies to reduce the risk of child-on-child abuse

Preventative strategies for **child-on-child** abuse are regularly considered. **A-List Education** has an ethos where children and young people feel safe to share information about anything that is upsetting them and any derogatory language or behaviour is always by staff.

There is a strong and positive PHSE and RSE curriculum and pastoral care system in their own schools or colleges, which gives children and young people an open forum to talk things through and explore disputes or difficulties. The IT curriculum also teaches child or young persons about acceptable online behaviour.

(xxvi) Prejudiced Behaviour

Children and young people may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded, or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child or young person to report abuse.

(xxvii) Child-on-child Abuse - sexual violence and sexual harassment

A-List Education also has a **zero-tolerance** approach to any form sexual violence and sexual harassment; it is never acceptable and **will not be tolerated**.

All staff working or volunteers working in our organisation have been advised to maintain an attitude of “**it could or is happening here**”.

Staff have been trained to be aware of and respond to ALL reports and concerns relating to sexual violence and / or sexual harassment both online and offline, including those which might be happening outside the company while children or young person is one of our courses or services being provided. Our DSL will take charge of procedures following a report on sexual violence / sexual harassment. (KCSIE 2022, paragraph 482).

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

However, it should be made clear to any alleged victim that their information stated may have to be passed onto relevant people to help support them with their disclosure.

Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE, paragraph 482.

This will include

- Initial response - considering the needs of both victim(s) and alleged perpetrator(s).

The victim will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support they will be offered.

This however will be balanced against the **A-List Education** duty and responsibilities to protect other children / young people and the following factors below:

- The nature of the alleged incident (s), including whether a crime may have been committed and /or whether Harmful Sexual Behaviour (HSB) has been displayed.
- The ages of children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children – are alleged perpetrators significantly older, more mature, confident, and well-known social standing? Does the victim have a disability or learning difficulty?
- Is the incident a one-off or sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- Has the sexual violence / harassment taken place within an intimate personal relationship?
- Importance of understanding intra familial harms and any necessary support for siblings following incidents.
- Any on-going risks to victim, other children, adult students or school or college staff?

- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation? (KSCIE 2022, paragraph 482).

The DSL will also review the following when responding to a report of sexual violence in order to make sure the right procedures are carried out

- Record Keeping
- Risk Assessment of the disclosure / event.
- Consideration of most appropriate response: internal management, early help, referral to Children's Social Care and/or referral to the Police.
- Ongoing response – safeguarding and support for all parties

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police.

The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the child or young persons involved. The DSL will lead enquiries at **A-List Education** level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the child or young person making the allegation and the alleged perpetrator and will explain the course of action, unless this is considered to place either of them at further harm.

If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

(xxviii) **Considering confidentiality and anonymity**

Confidentiality

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others to provide support and engage appropriate agencies.

A-List Education will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask **A-List Education** not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Staff **MUST** seek advice from the designated safeguarding lead (or deputy), who will consider the following:

- 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, and the police.

Rape, assault by penetration and sexual assaults are crimes.

Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, and the reasons will be explained to the victim and appropriate specialist support will be offered to the **young person**. KCSIE 2022, paragraphs 470 – 474.

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, appropriate staff will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

We will do all we can as an organisation to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The management of child or young persons with harmful behaviour (including sexually harmful behaviour) can be complex. **A-List Education** will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Any sanctions required following a report of **child-on-child** abuse will be determined on a case-by-case basis. (KCSIE 2022, paragraph 476).

(xxix) **Risk assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)

- all the other children, (and, if appropriate, adult students and staff) at **A-List Education** especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded (paper or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all our children and young people and put adequate measures in place to protect and keep the child safe. (KCSIE 2022, paragraph 479).

(xxx) Appropriate Support for Victim and Perpetrator

Appropriate support in **A-List Education** and from outside agencies if applicable, will also be put in place for any victims or any other child or young person affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

This will include pastoral support for both perpetrator and / or victim, through in-house counselling, reflection or behaviour modification support which may also be sought from external specialist agencies.

In all cases **A-List Education** will monitor the progress of both perpetrator and victim to ensure that this type of behaviour does not occur again.

(xxxi) E-safety and online behaviour.

A-List Education adopts a whole organisational approach to online safety which seeks to reduce risk as far as possible without depriving children and young people of the significant benefits provided by technology and the internet.

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

- (a) content: being exposed to illegal, inappropriate, or harmful material
- (b) contact: being subjected to harmful online interaction with other users
- (c) conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- (d) commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams

The company's **Staff Code of Conduct** and **Acceptable Use of ICT Policy** explain the responsibilities of staff in relation to keeping child or young persons safe online.

A-List Education all it reasonably can to limit the child or young person's exposure to the above risks in the organisation. It has sophisticated filters and monitoring systems in place, which are designed to protect them from online abuse without imposing unreasonable restrictions and preventing children and young people benefitting from the wealth of resources available online.

Cyber-bullying by child or young persons, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through the company's **Anti-bullying Policy and procedures**.

Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. If staff suspect that a child or young person may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

(xxxii) Remote Education

A-List Education are in regular contact with parents and carers.

A-List Education will ensure that those communications will be used to reinforce the importance of children and young people being safe online and enable parents and carers to understand what systems **A-List Education** uses to filter and monitor online use.

Parents and / or carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from **A-List Education** and if their child is going to be interacting with online. (KCSIE 2022, paragraph 139).

(xxxiii) Filters and monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our senior management team will do all they can to limit our **young persons'** exposure to the above risks from the **A-List Education** IT system.

(xxxiv) Youth produced sexual imagery, nudes/semi-nudes, sexting, up-skirting

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Up-skirting is also a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Anyone of any gender can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

Parents / carers will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the child or young person at risk of harm.

If there is concern a child or young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

(xxxv) Thresholds of Sexual behaviour by children

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following **'traffic light' approach**:

Green behaviours reflect safe and healthy sexual development. They are:

- i. Displayed between children or young people of similar age or developmental ability
- ii. Reflective of natural curiosity, experimentation, consensual activities, and positive choices

Amber behaviours have the potential to be outside safe and healthy development. They may be:

- i. Unusual for that particular child or young person
- ii. Of potential concern due to age or developmental differences
- iii. Of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour. They may be:

- i. Excessive, secretive, compulsive, coercive, degrading or threatening
- ii. Involving significant age, developmental or power differences
- iii. Of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for referral to Children's Services

(xxxvi) Preventing Radicalisation

As part of the Counter Terrorism and Security Act 2015, any educational business has a duty to 'prevent people being drawn into terrorism'. This is known as the **'Prevent Duty'**. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of **A-List Education** safeguarding approach. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country

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

(xxxvii) Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Visiting speakers are always vetted and staff must obtain permission from the **Director of A-List Education** for any speakers to visit **A-List Education**.

(xxxviii) Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

A representative from **A-List Education** may be asked to attend the Channel panel to help with this assessment.

(xxxix) Private Fostering

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

(xl) Fabricated Illness

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid.
- Induction of illness by a variety of means

Further information may be found at :- https://www.londoncp.co.uk/fab_ind_ill.htm

51. Appendix 2

(i) Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention.

The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and Protocol 1,
- Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

(ii) Equality Act 2010

Any educational establishment has obligations under the Equality Act 2010 (the Equality Act 2010). According to the Equality Act, educational establishments must not unlawfully discriminate against children or young people because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their child or young persons and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting child or young persons or students with a particular protected characteristic to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools -GOV.UK (www.gov.uk), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

52. Appendix 3

(i) **Child Protection Guidance Notes to all Staff: Hoe to Respond to Allegations of Abuse from a Child**

It is not for staff to decide if the allegations are true or not. Their role is only to listen, report as accurately as possible and follow the official procedure.

When listening to a disclosure, staff should:

- Stay calm and be available. (The student has put their trust in you.)
- Find out the general subject area. Ask 'What is it about?'
- If subject matter does require privacy and you are in public place, suggest to student to go somewhere quieter.
- Tell another staff member where you are and that you are having a private meeting with a student.
- Try to sit at right angles to student rather than directly opposite or next to them. Be open and ready to listen. Ask 'What do you want to tell me?'
- Be open, calm, patient and listen. Your role is only to hear what they have to say - try and remember their exact words.
- If appropriate, you can say; 'Is there anything else you want to tell me?'
- If the student hasn't already told you, you are allowed to ask only 'When did this happen?'

- When student has told all they want to, reassure them and say 'You've done the right thing to tell me.'
- Find somebody responsible (usually another staff member) to sit with them whilst you respond.
- Tell the DSL what has happened.
- Immediately afterwards, write a report of the meeting using the student's exact words, giving only facts and record time, date, place etc.
- Ensure the report is filed in proper (secure) place.
- Once you have handed the matter over to the DSL and completed and filed your report, and you know the student is being looked after, (it may be appropriate to go and see the student again to make sure they are OK), make sure you look after yourself. Being told information about child abuse is often very upsetting.

When listening to a disclosure, staff should not:

- Refuse to listen; e.g. tell them you're too busy or to see them later. Or over-react.
- Assume it's something related to abuse.
- Start asking more questions. Show worry or concern with your facial expressions.
- Be in a room on your own with a student with the door closed.
- Draw too much attention to the situation.

Promise confidentiality if they ask you to keep a secret. Explain 'If it's necessary, I will tell somebody else (who can help more than I can.)'

- Put words in their mouth or make any comments on what they tell you.
- Write while they are talking to you.
- Ask any direct or leading questions or start probing. (That could jeopardise any subsequent police investigation, if that becomes necessary.)
- Leave the student alone after they've disclosed. Make it clear to staff member sitting with student not to ask any questions; just be a reassuring presence
- Tell any colleagues what the student has said (apart from one of those listed as needing to be told).
- Write any opinions or draw any conclusions about anything. Don't write any comments about the accused.
- Try and 'improve' the student's English if it wasn't grammatically accurate or vocabulary was wrong. (That is a job for any police or social services people to do.)
- Talk to any colleagues about what has happened but if you feel you need support please speak to the DSL or a Director of A-List

53. Appendix 4

(i) Referrals Form

This form should be completed as soon as possible after an allegation has been made by the member of staff whom the allegation has been made to. Once completed the form should be immediately passed to the DSL.

Date and time of form submitted	
Name of event	
Referrer's name and contact details	
Details of staff/adult who the allegation has been made against (if relevant)	
Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Role/connection with event	
Home address	
Details of student(s) involved in the allegation	
Full name	
Date of birth	
Gender	
Nationality	
Student's first language	
Any disability?	
Home address	
Parent's name	
Details of alleged incident	
Date and time of incident	
Place of incident	
Brief circumstances of incident	
Names of potential witnesses	
Nature of allegation	
Category (physical / sexual / emotional / neglect)	
Was technology involved? What type?	
Is there any other information that you think is important to share?	
Signed (by person submitting referral)	

54. Appendix 5

(ii) Guidance for Online Sessions for Staff

Staff are advised to treat any online session as a live lesson, all normal professional standards apply. There are some extra precautions staff need to be aware when operating via video link.

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred where possible.
- If other people share your home, make them aware that you are delivering a lesson and consider how their actions may accidentally impact the lesson. It is strongly advised that they do not appear on camera.
- Tutors should never disclose their phone, personal email with the student.
- Tutors should never communicate with students on any unapproved social media platform.
- Tutors phones should be placed on silent mode for the duration of the session.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use Google Classroom, Skype, Teams or Zoom to communicate with pupils
- Tutors must not share any links to online content or website that contains anything other than educational resources that directly link to the content of their tutoring session.
- Staff should record the length, time, date and attendance of any sessions held and report any concerns to the DSL at once.

I have read and understood the Safeguarding Policy 2023:

Name _____ Date _____ Signature _____