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School of OUTDOORS

Child protection and safeguarding policy

(including safer recruitment & allegations against staff and low-level concerns)

schoolofoutdoors.uk

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Important Contacts

Role	Name	Contact details
Designated safeguarding lead (DSL)	Dominic Taylor	dominic@schoolofoutdoors.uk 07983 208842
Deputy DSL	Jonathan Hitchinson	jonathan@schoolofoutdoors.uk 07983 208765
Deputy DSL	Alex Wilkes	alex@schoolofoutdoors.uk 07983 208782
Office		info@schoolofoutdoors.uk 01296 336644
DfE counter-extremism helpline		020 7340 7264

Aims

School of Outdoors aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote young people's welfare
- All team members are aware of their statutory responsibilities with respect to safeguarding
- Team members are properly trained in recognising and reporting safeguarding issues

Legislation and statutory guidance

School of Outdoors have based this policy around the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see Definitions).

This policy is also based on guidance from the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of young people. This duty does not apply directly to School of Outdoors as a private company, but we follow it as good practice
- The schools Staffing (England) Regulations 2009, which set out what must be recorded

on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques. These regulations apply to maintained schools; we follow them as good practice

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means we carefully consider how we are supporting young people with regard to these characteristics.
- The Public Sector Equality Duty (PSED), which applies to public bodies. Although it does not apply directly to School of Outdoors as a private company, we follow it as good practice by having due regard to eliminating unlawful discrimination, harassment and victimisation. This helps us to focus on key issues of concern and how to improve young person outcomes. Some young people may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Crime and Policing Act 2026, section 139 of which removes the previous 'supervision exemption' from the definition of regulated activity. From 1 September 2026, supervised volunteers who meet the regulated activity criteria require the same enhanced DBS and barred list checks as unsupervised team members
- The Data (Use and Access) Act 2025, which alongside the Data Protection Act 2018 and UK GDPR forms part of the legal basis for information-sharing for safeguarding purposes

Definitions

Safeguarding and promoting the welfare of young people means:

- Providing help and support to meet the needs of young people as soon as problems emerge
- Protecting young people from maltreatment whether that is within or outside the home, including online
- Preventing impairment of young people's mental and physical health or development
- Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific young people who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Click here; for an explanation of the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Click here; for a definition of neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where young people share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18. In all of our policies we refer to children as 'young people'

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described

that way. When managing an incident, we will be prepared to use any term that the young person involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of young people) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Equality statement

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

We give special consideration to young people who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or repeat occasions

Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all team members in the company and is consistent with the procedures of the 3 safeguarding partners.

All staff

At School of Outdoors we refer to all staff, freelance instructors as 'team members '

All team members will:

- Read and understand Part 1 in full, and Annex A (formerly Annex B), of the Department for

Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. This applies to all team members, including those who do not work directly with young people; there is no shortened or condensed version for any group of staff
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask young people to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for young people who are LGBTQ+ to speak out and share their concerns

All team members will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the company's behaviour policy, the role and identity of the designated safeguarding lead (DSL) and deputy, and the safeguarding response to young people who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a young person tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- The fact that young people can be at risk of harm inside and outside of their home, at school and online
- The fact that young people who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other young people
- That a young person and their family may be experiencing multiple needs at the same time
- What to look for to identify young people who need help or protection

The designated safeguarding lead (DSL)

The company DSL is **Dominic Taylor, CEO**. The DSL takes lead responsibility for young person protection and wider safeguarding across the company.

When the DSL is absent, the deputy – **Jonathan Hitchinson, Company Director** or **Alex Wilkes, Company Director** will act as cover.

Full contact details can be found at the start of this document

The DSL completes the relevant training, and has access to the relevant resources and support to:

- Provide advice and support to other team members on young person welfare and young person protection matters
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support team members who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Understand filtering and monitoring systems and processes on offer to the company, *we currently do not use company technology such as smart phones or computers with young people*

The DSL will also:

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

Company Directors

The company directors are responsible for the implementation of this policy, including:

- Facilitate a whole-company approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold themselves to account for its implementation
- Ensuring that team members (including temporary staff) and volunteers:
  - Are informed of our systems that support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
  - Undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Communicating this policy to parents/carers of young person we work with.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and multi-agency safeguarding arrangements
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT team members and service providers what needs to be done to support the company in meeting these standards
- Make sure:
  - Online safety is a running and interrelated theme within the whole-company approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The company has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about team members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - That this policy reflects that young people with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the company about

safeguarding arrangements, where appropriate

Recognising abuse and taking action

All School of Outdoors team members are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a young person who:

If you have a concern about a weapon: team members must report any concern about a young person carrying, using, or expressing an intention to use a weapon to the DSL (or a deputy) immediately. The DSL will assess the risk to the young person and to others, considering any wider information or concerns, and take appropriate action. Depending on the risk, this may include a safety and support plan, a referral to the police and/or local authority children's social care, and/or action to de-escalate any peer conflict. This duty applies whether the young person concerned is thought to be at risk themselves, or to pose a risk to others.

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education

- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Team members and volunteers must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, any references to the DSL to mean "the DSL (or deputy DSL)".

If a young person is suffering or likely to suffer harm, or in immediate danger

- Make a referral to local authority children's social care and/or the police immediately if you believe a young person is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral**.
- Tell the DSL (contacts) as soon as possible if you make a referral directly.

Reporting young person abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

If a young person makes a disclosure to you

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

Bear in mind that some young people may:

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

disability, sexual orientation and/or language barriers

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

If you discover that FGM has taken place or a young person is at risk of FGM

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

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

Possible indicators that a young person has already been subjected to FGM, and factors that suggest a young person may be at risk, are set out in appendix 4 of this policy.

Any team member who either:

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

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

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

Any other team member who discovers that an act of FGM appears to have been carried out on a **young person under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for team members mentioned above does not apply in cases where a young person is at risk of FGM or FGM is suspected but is not known to have been carried out. Team members should not examine young people.

Any team members who suspects a young person is at risk of FGM or suspects that FGM has been carried out or discovers that a young person aged 18 or over appears to have been a victim of FGM should speak to the DSL.

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

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate

action being taken. Take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If a Family Help response is appropriate, the DSL will generally lead on liaising with other agencies and coordinating support through the Family Help model (which replaces the previous separate early help and Section 17 pathways), as appropriate. Team members may be required to support other agencies and professionals with this, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

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

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

If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for

identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

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

If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Team members will be alert to behavioural signs that suggest a young person may be experiencing a mental health problem or be at risk of developing one.

If you believe a young person is in immediate danger relating to their mental health (for example, they are presenting as suicidal, or you believe they are at immediate risk of serious self-harm), call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. For urgent but non-emergency concerns, NHS 111 (option 2, mental health) can also advise. Tell the DSL as soon as possible afterwards.

If you have a mental health concern about a young person that is also a safeguarding concern but not an immediate emergency, take action by following the steps in the section above.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Concerns about a team member, supply teacher, volunteer or contractor

If you have concerns about a team member (including a contractor or volunteer), or an allegation is made about a team members (including a contractor or volunteer) posing a risk of harm to young people, speak to a company director as soon as possible.

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

Allegations of abuse made against other young people

We recognise that young people are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for young people.

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

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

- Is serious, and potentially a criminal offence
- Could put young people at risk
- Is violent, including serious violence or involving a weapon, or involves misogyny or other discriminatory targeting
- Involves young people being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, whether real, digitally altered, or wholly AI-generated)

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

If a young person makes an allegation of abuse against another pupil:

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting young people and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour

between peers, including requesting or sending sexual images

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female young people, and initiation or hazing type violence with respect to boys
- Ensure our programs helps to educate young people about appropriate behaviour and consent
- Ensure young people are able to easily and confidently report abuse using our reporting systems
- Ensure team members reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support young people who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure team members are trained to understand:
- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse, it does not mean it is not happening – team members should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Young people can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A team member may overhear a conversation
    - A young person's behaviour might indicate that something is wrong
- That certain young people may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a young person harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a young person may be at risk from it

- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

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

Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the making or sharing of nude or semi-nude images, videos or livestreams — whether taken by the young person, taken by someone else, digitally altered, or wholly AI-generated (including so-called 'deepfakes' or 'nudified' images) — you must report it to the DSL immediately. A safeguarding response is required in every case, whether the sharing was consensual or non-consensual; what differs is the nature and proportionality of the response, not whether a response happens.

You **must not**:

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

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

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a young person to groom or exploit a young person , the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any young person in the images or videos is under 13
- The DSL has reason to believe a young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done direct by the DSL.

Recording incidents

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

Reporting systems for our young people

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

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

To achieve this, we will:

- Put systems in place for young people to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for young people
- Make it clear to young people that their concerns will be taken seriously, and that they can safely express their views and give feedback

Online safety and the use of mobile technology

We recognise the importance of safeguarding young people from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Although we do not use such company technology with young people we understand the need to / and educate team members that we should;

- Protect and educate the whole company in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Operate as a mobile-phone-free environment by default for young people in our care, with no access to phones during sessions, transitions or breaks unless a clearly agreed exception applies (for example, for medical reasons)
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Review the effectiveness of our filtering and monitoring provision at least annually, with this review reported to and signed off by the company directors

The 4 key categories of risk

For reference, online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, disinformation, misinformation and conspiracy theories, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as young people or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

We will continue through our work to educate young people about online safety. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring young people are encouraged to do so, including where they're a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring.

Educate parents/carers about online and share clear procedures with them so they know how to raise concerns about online safety

Make sure all staff, young people and parents/carers understand our phone-free approach. Team members do not have a legal power to search young people's phones or belongings.

Any concern about content on a young person's device must be reported to the DSL, who will decide on next steps, which may include involving parents/carers, the police or children's social care.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Team members , young people and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

School of Outdoors recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard young people. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose young people to harmful content. This includes 'deepfakes' — AI-generated images, audio or video that look real — and 'nudification' apps, which are used to create fake nude or semi-nude images of real people. We treat both as forms of image-based abuse and will respond to any such incident in line with our 'Sharing of nudes and semi-nudes' procedures, regardless of whether the underlying image was real or AI-generated.

School of Outdoors will treat any use of AI to access harmful content or bully young people in line with this policy and our behaviour policy.

Team members should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Notifying parents or carers

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

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

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

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Operation Encompass: where we receive an Operation Encompass notification that a young person has been present at, or involved in, a domestic abuse incident, the DSL will ensure this information is recorded and acted on sensitively, and that the young person's own voice and wishes are reflected in how we respond.

Young people with special educational needs, disabilities or health issues

We recognise that young people with SEND or certain health conditions can face additional safeguarding challenges. Young people with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other young people
- The potential for young people with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours or the consequences of doing so

We offer extra pastoral support for these young people, tailored to their individual needs and any EHC plan.

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

We will be alert to the extra vulnerabilities these young people may face due to the residential nature of our setting.

Young people with a social worker

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

The DSL and all team members will work with and support social workers to help protect vulnerable young people.

Where we are aware that a young person has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Looked-after and previously looked-after young people

We will ensure that team members have the skills, knowledge and understanding to keep looked-after young people and previously looked-after young people safe. In particular, we will ensure that:

- Appropriate team members have relevant information about young people's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of young people's social workers

The DSL is responsible for promoting the educational achievement of looked-after young people and previously looked-after young people in line with statutory guidance.

As part of their role, the DSL will:

- Ensure that any safeguarding concerns regarding looked-after and previously looked-after young people are quickly and effectively responded to
- Promote the educational achievement of looked-after and previously looked-after young people

Young people who are lesbian, gay, bisexual or gender questioning

We recognise that young people who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other young people. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ young people are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning young people, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal young people.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a young person may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where young people lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where young people can speak out or share their concerns with members of staff.

Facilities: our premises provide facilities that meet statutory single-sex requirements, including separate toilet and changing provision. Where we use third-party sites (for example campsites, activity centres, or the YHA), we check that their facilities meet the same standards before booking. Any gender-neutral facilities we or a third-party provider offer are individual, lockable, single-occupancy rooms, in line with regulatory expectations, rather than shared or mixed facilities.

Complaints and concerns about company safeguarding policies

Complaints against staff

Complaints against team members that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against team members (see appendix 3).

Other complaints

Please refer to our company's complaints procedure

Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern

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

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

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

Safeguarding records relating to individual young people will be retained for a reasonable period of time after they have left.

Training

All staff

All team members will undertake safeguarding and child protection training, including on whistle-blowing procedures and online safety, to ensure they understand the company's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the company's safeguarding approach and team members training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for team members around filtering and monitoring

All team members will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify young people at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Team members will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins).

The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Company Directors

All directors receive training about safeguarding and child protection (including online safety), which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the company to deliver a robust whole-company approach to safeguarding

Recruitment – interview panels

At least 1 person conducting any interview for any post at the company will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

Monitoring arrangements

This policy will be reviewed annually

Version Control

Version	Author	Summary of Changes	Date
1.0	Jonathan Hitchinson	Policy created	01/07/2024
2.0	Jonathan Hitchinson	Policy review	01/07/2026
3.0	Jonathan Hitchinson	2026/7 update for KCSIE 2026 / Working Together 2026 (in force 1 September 2026): updated statutory guidance citations; added weapons-reporting duty; updated mental health emergency (999/A&E) pathway; broadened child-on-child abuse and sharing of nudes/semi-nudes provisions to cover AI-generated imagery, serious violence and misogyny; updated AI section for deepfakes/nudification apps; added annual filtering and monitoring review; updated mobile phone policy to phone-free by default; added Operation Encompass; updated Early Help to Family Help; removed DBS supervision exemption for volunteers in line with the Crime and Policing Act	26/08/2026

		2026; strengthened shortlisting due diligence; confirmed trainee/placement staff within allegations framework; confirmed premises meet single-sex facilities requirements. Gender-questioning section not otherwise substantively changed pending further review.	
3.1	Jonathan Hitchinson	Corrections following review alongside Employee Handbook v3.0: corrected references (Keeping Children Safe in Education, Children Act 2004, Children and Social Work Act 2017, CAMHS) and typos; completed template placeholders; numbered appendices 1–4 and fixed cross-references; clarified that team members have no power to search phones and who acts as case manager; stated that section 175, the School Staffing Regulations and the PSED are followed as good practice; updated Google Gemini, FCDO Forced Marriage Unit email and DfE counter-extremism helpline label.	07/10/2026

Appendix

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person . Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

Emotional abuse may involve:

- Conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on young people. 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 young person participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people

Sexual abuse involves forcing or enticing a young person or young people to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet)

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a young person is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a young person from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs

Appendix 2: Safer recruitment and DBS checks policy and procedures

Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

Our shortlisting process will involve at least 2 people and will:

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

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

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

We will also carry out an online search on all shortlisted candidates as part of our pre-appointment due diligence, to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we carry out these checks as part of our recruitment process.

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person . Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with young people if they are not currently working with young people
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

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

Regulated activity means a person who will be:

- Responsible, on a regular basis for teaching, training, instructing, caring for or supervising young people; or

- Carrying out paid or unpaid work regularly (whether supervised or not) where that work provides an opportunity for contact with young people; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

From 1 September 2026, the previous exemption for supervised volunteers no longer applies. All volunteers who meet the criteria above — supervised or not — require an enhanced DBS check with barred list information.

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with young people; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

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

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

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

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

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

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

We will check the identity of all contractors on arrival.

Appendix 3: Allegations of abuse made against staff (including low-level concerns) policy

Section 1: Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current team member — including a contractor, volunteer, or anyone on a trainee or placement basis — has:

- Behaved in a way that has harmed a young person, or may have harmed a young person, and/or
- Possibly committed a criminal offence against or related to a young person, and/or
- Behaved towards a young person or young people in a way that indicates they may pose a risk of harm to young people, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with young people.

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

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

A 'case manager' will lead any investigation. This will normally be the CEO. Where the CEO is the subject of the allegation, another company director will act as case manager, taking advice from the LADO. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the company so that the individual does not have direct contact with the young person or young people concerned
- Providing an assistant to be present when the individual has contact with young people
- Redeploying the individual to alternative work in the company so that they do not have unsupervised access to young people

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

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to young people or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with young people is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate

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

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

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

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

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/young people involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/young people involved informed of the progress of the case (only in relation to their young person – no information will be shared regarding the team member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the company is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual, pending the findings of the investigation.

Where the police are involved, wherever possible the company will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the company's disciplinary process, should this be required at a later point.

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

Individuals returning to work after suspension

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

The case manager will also consider how best to manage the individual's contact with the young person or young people who made the allegation, if they are still attending.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the young person and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the company will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

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

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another team member
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with young people
- Having favourites
- Taking inappropriate photographs of young people on their mobile phone
- Engaging with a young person on a one-to-one basis in a secluded area or behind a closed door without prior agreement, such as with lone working for alternative provisions
- Humiliating young people

Sharing low-level concerns

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

We will create this culture by:

- Ensuring team members are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering team members to share any low-level concerns in line with the 'Concerns about a team member, supply teacher, volunteer or contractor' section of this policy
- Empowering team members to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the company's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, a company director will collect evidence where necessary by speaking:

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

The company director will use the information collected to categorise the type of behaviour and determine any further action, in line with the company's behaviour policy. The company director will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

Records will be:

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

References

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

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

Appendix 4: Specific safeguarding issues

The following guidance is based on the advice in Keeping Children Safe in Education, in particular annex B

Assessing adult-involved nude and semi-nude sharing incidents

Guidance based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are young person sexual abuse offences and must immediately be referred to **police/social care**. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a young person or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a young person or young person to encourage a response and build trust. The offender often grooms the young person or young people on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the young person or young person to create and share nude or semi-nude, the offender may share pornography or young person sexual abuse material (images of other young people), including AI-generated material.

Once a young person or young people shares a nude or semi-nude, an offender may blackmail the young person or young people into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the young person or young person being:

- Contacted by an online account that they do not know but appears to be another young person or young people
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits

- Threatened or blackmailed into carrying out further sexual activity. This may follow the young person or young people initially sharing the image or the offender sharing a digitally manipulated image of the young person or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a young person or young people unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a young person or young people , or hack another young person's account to make initial contact. To financially blackmail the young person or young people , they may:

- Groom or coerce the young person or young people into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the young person or young people taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the young person or young people

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the young person or young person being:

- Contacted by an online account that they do not know but appears to be another young person or young people . They may be contacted by a hacked account of a young person or young people
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the young person or young people

Young people who are absent from education

A young person being absent from education, particularly repeatedly, can be a warning sign of

a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or young person criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a young person may be absent or become missing from education, but some young people are particularly at risk. These include young people who:

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

We will follow our procedures, and work with schools / LA for unauthorised absence and for dealing with young people who are absent, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a young person leaves the AP program without a new company being named, and adhering to requirements with respect to sharing information with the local authority, when applicable.

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

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

Young person criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

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

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

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

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

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

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

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

Child-on-child abuse

Child-on-child abuse is when young people abuse other young people. This type of abuse can take place inside and outside of education settings. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

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

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

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

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

If team members have any concerns about child-on-child abuse, or a young person makes a report to them, they will follow the procedures set out in this policy 'recognising abuse'

When considering instances of harmful sexual behaviour between young people, we will consider their ages and stages of development. We recognise that young people displaying

harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members , teenage relationship abuse (abuse in intimate personal relationships between young people) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on young people of all forms of domestic abuse, including where they see, hear or experience its effects.

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

Older young people may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

Homelessness

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

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

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

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

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

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

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

procedures.

FGM

The DSL will make sure that team members have access to appropriate training to equip them to be alert to young people affected by FGM or at risk of FGM.

This section of the policy sets out the procedures to be followed if a team member discovers that an act of FGM appears to have been carried out or suspects that a young person is at risk of FGM.

Indicators that FGM has already occurred include:

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

Potential signs that a young person may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other young people about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (young person health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a young person under the age of 18 to marry, even if violence, threats or coercion are not involved.

Team members will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a team members suspects that a young person is being forced into marriage, they will speak to the young person about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the young person about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fcdo.gov.uk
- Refer the young person as appropriate

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or

- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person /people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Prevent - The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that team members have access to appropriate training to equip them to identify young people at risk.

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

Team members will be alert to changes in young people' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a young person is being radicalised can include:

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

Young people who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal

teenage behaviour – team members should have confidence in their instincts and seek advice if something feels wrong.

If team members are concerned about a pupil, they will follow our procedures set out in the 'If you have concerns about extremism' section of this policy, including discussing their concerns with the DSL.

Team members should always take action if they are worried.

Sexual violence and sexual harassment between young people

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, team members will:

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

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

Team members should be aware of the importance of:

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

If team members have any concerns about sexual violence or sexual harassment, or a young person makes a report to them, they will follow the procedures set out in this policy 'recognising abuse'.

Serious violence

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

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

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

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

Team members will be aware of these indicators and risk factors. If a team member has a concern about a young person being involved in, or at risk of, serious violence, they will report this to the DSL.