



Safeguarding & Child Protection Policy

Approved by:
The Directors of Strive Alternative Provision

Signed on behalf of the Directors by:
Stacey Hickey, Head of Operations

Date Approved: March 2026
Review Date: March 2027

Policy Update Summary (2026)

- Updated in line with KCSIE 2025
- Updated in line with Working Together to Safeguard Children 2023 (2026 updates)
- Inclusion of Multi-Agency Safeguarding Arrangements (MASA)
- Strengthened expectations around information sharing
- Added reference to disproportionality, equality and anti-discriminatory practice

Legal & Statutory Framework

This policy is informed by:

- Children Act 1989 & 2004
- Education Act 2002
- Children and Families Act 2014
- Equality Act 2010
- UK GDPR & Data Protection Act 2018
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education (KCSIE) 2025
- Counter-Terrorism & Security Act 2015 (Prevent Duty)
- Sexual Violence & Sexual Harassment Guidance
- Local Authority AP Safeguarding Requirements (2024/25)
- Buckinghamshire Safeguarding Children Partnership procedures

Strive operates within the Buckinghamshire Multi-Agency Safeguarding Arrangements (MASA), which set out how safeguarding partners (local authority, police and health) work together to safeguard students.

These arrangements include accountability for safeguarding outcomes, scrutiny, and ensuring effective multi-agency practice across Buckinghamshire, including for students who are looked after. These arrangements include joint responsibility for safeguarding outcomes, learning from reviews, and improving multi-agency practice.

Strive Alternative Provisions Designated Safeguarding Leads (DSL) are:

Stacey Hickey, Head of Operations
Naomi Alderton, Family Liaison
Adam Morris, Head of PfA & Post-16
Liam Hickey, Head of Interventions & Support

1. Introduction/Purpose

It is essential that everybody working in a Provision understands their safeguarding responsibilities. Everyone who comes into contact with students and families has a role to play in ensuring students and young people are safe from abuse, neglect, exploitation and harm. Our Provision is committed to safeguarding students and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the child.

Our students' welfare is our main concern. The Directors will ensure that our Provision will safeguard and promote the welfare of students and work together with agencies to ensure that our Provision has adequate arrangements to identify, assess and support those students who are suffering or where significant harm is suggested.

This policy provides the basis for good practice within the Provision for Safeguarding work. It should be read in conjunction with the Buckinghamshire's Safeguarding Students's Board Safeguarding Policies and Procedures, plus the safeguarding appendix document. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.

The Provision is committed to identifying and addressing disproportionality in safeguarding, including where certain groups of students may be overrepresented in safeguarding processes. Staff will remain reflective in their practice and challenge bias.

This policy applies to all members of staff in our Provision, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

2. The Legal Framework

2.1. This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

- Working Together to Safeguard Students (2023, with national updates and clarifications)
- Keeping Students Safe in Education, September 2025

3. Roles and Responsibilities

3.1. The Provision's Designated Safeguarding Lead (DSL) has overall designated responsibility for safeguarding and ensures there is always appropriate cover for

this role. The responsibilities of all Designated Safeguarding Leads are described in detail in Appendix A.

3.2. The Head of Provision is responsible for ensuring that safeguarding arrangements are fully embedded within the Provision's ethos and reflected in the Provision's day-to-day practice.

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

3.4. Our Provision acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviors are challenged, and students are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.

3.5. The Provision takes all reasonable action to limit students' exposure to the risks from the Provision's IT system and ensure the Provision has appropriate filters and monitoring systems.

3.6. The Provision implements proportionate filtering and monitoring arrangements appropriate to its size and context. Internet safety measures are reviewed regularly, and staff supervise students' use of technology to minimise exposure to harmful or inappropriate online content. Any concerns identified through online activity are managed in accordance with safeguarding procedures.

4. Supporting Students

4.1. Our Provision will support all students by:

- ensuring the content of the curriculum includes social and emotional aspects of learning through other alternative curriculum contexts and ensuring that students are taught about safeguarding so that they recognise when they are at risk and how to get help when they need it.
- ensuring a comprehensive curriculum response to online safety, enabling students and parents to learn about the risks of new technologies and social media and to use these responsibly.
- encouraging students to talk about feelings and are listened to, providing students with a range of appropriate adults to approach as needed.
- supporting students to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness while not condoning aggression or bullying.

- liaising and working together with other support services and those agencies involved in safeguarding students, including domestic abuse, Early Help and preventative services
- considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- having a behaviour policy that is aimed at supporting vulnerable students in the Provision. The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).
- acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.
- alerting the authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to Provision, and at other times, the Provision will be vigilant in identifying any private fostering arrangement.
- acknowledging that a child that is looked after or has been previously looked after by the Local Authority potentially remains vulnerable and all staff have the skills, knowledge and understanding to support these students.
- taking positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting students or students with certain protected characteristics to meet their specific need. For example, taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. This includes making reasonable adjustments for disabled students and young people and those identified as having special educational needs.

5. Dealing with a Concern and Record Keeping

5.1. If a member of staff has a concern about a child or if a child tells them they are being abused, exploited or neglected. Staff will appropriately respond by listening and offering reassurance. Strive records safeguarding concerns using CPOMS and maintains secure chronologies in accordance with data protection legislation. Staff should:

Make an accurate factual record as soon as possible including details of:

- Dates and times of their observations
- Dates and times of any discussions in which they were involved
- Any injuries
- Explanations given by the child/adult
- What action was taken
- Any actual words or phrases used by the child
- Any questions the staff member asked (remembering not to ask any leading questions)
- The records must be signed and dated by the author (or equivalent on electronic based records).
- Listen to the wishes and feelings of the child, but not to promise confidentiality
- Report it to the DSL/DDSL

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

In the absence of the DSL or DDSL, staff will refer directly to MASH or the child's social worker (if applicable) and the police (if appropriate) if there is a significant concern

5.2. The DSL will ensure any decisions and justifications for those decisions will be recorded in writing with clear outcomes documented following any action taken

5.3. Our Provision will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate and Provision staff would consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and why

5.4. Safeguarding records are kept for individual students and are maintained separately from all other records relating to the child in the Provision. Safeguarding records are kept in accordance with General Data Protection Regulations (GDPR) and our own centre GDPR policy

5.5. All safeguarding records will be transferred in accordance with GDPR/KCSiE to the child's receiving centre/setting within 5 working days

5.6. The Provision Lead will be kept informed of any significant concerns by the DSL, if they are not the DSL, and all other staff are informed on a need-to-know basis

6. Missing Student / Absconding During Provision

Strive Alternative Provision recognises that a student leaving supervision without permission (absconding) constitutes a safeguarding concern.

Absconding may indicate:

- Emotional distress or dysregulation
- Risk-taking behaviour
- Exposure to exploitation (CCE/CSE)
- Mental health crisis
- Traffic and environmental danger
- Vulnerability due to SEND

All incidents of absconding must be treated as safeguarding incidents and managed in line with this procedure.

Definition

For the purpose of this policy, a student is considered missing when:

- They leave the site or activity without staff permission
- Their whereabouts are unknown
- They are not where they are expected to be
- They cannot be located following an immediate search

Immediate Response Procedure

Stage 1 – Immediate (0–2 Minutes)

- Staff member raises alert via radio/phone immediately.
- Headcount conducted.
- Last known location and direction of travel confirmed.
- Incident Lead identified (SLT or most senior staff present).

No staff member should leave other students unsupervised.

Stage 2 – Initial Search (Up to 5 Minutes)

- Staff conduct a coordinated sweep of immediate area.
- Off-site: one staff member remains with group at agreed safe point.
- Exits monitored where possible.
- Risk level assessed (age, SEND needs, known vulnerabilities, traffic risk).

Stage 3 – Escalation (Within 5–10 Minutes)

Parents/carers must be contacted promptly.

Police must be contacted immediately via 999 if:

- The student is under 12
- There is risk of harm (traffic, water, railway, busy town centre)
- The student has known exploitation risk
- The student is emotionally distressed or threatening self-harm
- The student cannot be located within a reasonable timeframe in a public space

Police should not be delayed due to assumptions about waiting periods.

Off-Site Specific Protocol

When off-site:

- A safe regrouping point must be established immediately.
- At least one staff member remains with the main group.
- One staff member may search only within visible range.
- Staff must not pursue into unsafe areas alone.
- Venue staff should be informed.

When the Student Is Located

- Immediate visual assessment for injury or distress.
- Calm, regulated re-entry.
- Parent informed (if not already).
- Full incident recorded on CPOMS same day.
- Individual risk assessment reviewed within 24 hours.
- Consider multi-agency referral if patterns emerging.

Recording & Review

All absconding incidents must include:

- Timeline (minute by minute where possible)
- Location
- Staff involved
- Search actions taken
- Time parent contacted
- Police contact (if applicable)

- Outcome
- Student presentation on return

SLT must review for patterns and adapt risk planning accordingly.

7. The Role of an Appropriate Adult in Safeguarding

The Police and Criminal Evidence (PACE) act advises that “The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons”, with there being further elaboration that the AA is expected to observe those entitlements, as well as helping the detained person understand their rights.

8. Information Sharing

Information will be shared appropriately and without delay where there are safeguarding concerns. Consent is not required where there is risk of harm. All decisions will be recorded with a clear rationale in line with statutory guidance.

8.1. We recognise that all matters relating to Safeguarding are confidential

8.2. All staff members have a professional responsibility to share information with other agencies to safeguard students

8.3. All staff members who come into contact with students will be given appropriate training to understand the purpose of information sharing to safeguard and promote students’ welfare

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

8.5. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping students safe.

9. Multi-Agency Working

9.1. We will develop and promote effective working relationships with other agencies, including agencies providing early help services to students, the police and students’ social care.

9.2. We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual students.

9.3. We will participate in Child Safeguarding Practice Reviews, other reviews and file audits as and when required by the Buckinghamshire Safeguarding Students's Board. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

10. Safer Recruitment

10.1. Our Provision is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.

10.2. The Leadership Team are responsible for ensuring that the centre follows safe recruitment processes outlined within guidance.

10.3. The Provision maintains an accurate Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Provisions Senior Team.

10.4. The Head of Operations will ensure that at least one of the people who conducts a recruitment interview has completed safer recruitment training.

10.5. We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 and related obligations under the Childcare Act 2006 in centres. (This requirement is only applicable where Strive provides services to students under the age of 8)

10.6. The Provision will ensure that contractors and providers are aware of the Provisions safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. The Provision will require that employees and volunteers provided by these organisations use the Provision's procedures to report concerns.

10.7. We will seek assurance that employees and volunteers provided by these organisations and working with our students have been subjected to the appropriate level of safeguarding checks in line with Keeping Students Safe in Education: 2025. If assurance is not obtained, permission to work with our students or use our Provision premises may be refused.

10.8. When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

10.9. We advise all staff to disclose any reason that may affect their suitability to work with students that could be a transferable risk to their role.

11. Training

11.1. All staff in our Provision are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.

11.2. Our DSL undergoes training to provide them with the knowledge and skills required to carry out their role. Our DSL and any members of our DSL team undergo their DSL training every 2 years to fulfil their role.

11.3. In our Provision, all staff receive appropriate safeguarding training at induction and is updated at least annually.

11.4. Separate training is provided to all new staff on appointment as part of their induction process including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This information will be regularly updated.

11.5. Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Provision are effective and support the delivery of a robust whole centre approach to safeguarding. Their training should be regularly updated.

11.6. We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-centre training if it takes place during their period of work for the Provision.

11.7. The Designated Safeguarding Lead will provide briefings to the Provision on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPR's) in line with Working Together to Safeguard Students 2023. These will occur annually or more frequently when necessary and will include safeguarding and child protection updates such as online safety (for example, via emails, e-bulletins and staff meetings), to provide them with the skills and knowledge to safeguard students effectively.

11.8. The centre will maintain accurate and up to date records of staff induction and training.

12. Whistleblowing in a Safeguarding Context

12.1. While the Provision has a separate whistleblowing policy, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

This does not replace the whistleblowing policy and should be read in conjunction with the Provision policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

The Head of Provision is responsible for all staff. If you are concerned that any member of staff within the Provision is not following safeguarding processes or is behaving in a way that is placing students at risk you should, in the first place, make the Head of Provision aware.

If your concern is about the H of O, you should raise this with our Senior Team or the LADO.

If you would prefer to raise your concerns outside of the Provision, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk for national organizations or make contact with Buckinghamshire County Council.

If you believe that a member of the Provision staff is harming a child (an allegation) and this has been reported to the Manager and no / insufficient action has been taken, or the member of staff you have concerns about is the Manager, then you are able to contact the Designated Officers team (LADO) on 01296 383 962.

If you believe that a child is being abused by individuals outside the Provision, you can make a referral to Bucks First Response Team by calling 01296 383 962 (office hours) or 0800 999 7677 (outside of office hours).

12. Site Security

12.1. All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors into the Provision. This includes referring to our visitor's safeguarding policy where appropriate and signing in / out protocols are followed.

12.2. The Provision will not accept the behaviour of any individual, parent or anyone else, that threatens Provision security or leads others, child or adult, to feel unsafe.

Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the Provision site.

13. Quality Assurance

13.1. We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.

13.2. The Provision's Senior Team will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

13.3 We will evaluate the impact of safeguarding practice on outcomes for students, ensuring improvements are evidenced and embedded. We will analyze safeguarding data to identify trends, patterns, and any disproportionality.

14. Policy Review

14.1. This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.

14.2. The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.

14.3. Additional updates to the safeguarding policy and appendix will take place when needed.

APPENDIX A: The role of the Designated Safeguarding Lead

Managing referrals:

- Refer cases to MASH and the police, where appropriate, in a timely manner avoiding any delay that could place the child at increased risk
- Identify any safeguarding issues relating to individual students, especially ongoing enquiries under section 47 of the Students Act 1989
- Refer to Buckinghamshire 'The Continuum of Need'
- Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding, including contextual safeguarding.
- Have responsibility to ensure there is at least one key adult for 'Operation Encompass' and a point of contact for Child Exploitation. *Guiding principles of the scheme are here <https://www.operationencompass.org/centre-participation>. An annual information letter must be sent to parents.

- To ensure that the Local Authority are notified if students are persistently absent or missing from education

Record keeping:

- Keep written (or online) records of safeguarding and welfare concerns and ensure a stand-alone file is created as necessary for students with safeguarding concerns
- Provision should have at least two emergency contacts for every child in the centre in case of emergencies and in case there are welfare concerns at the home
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions
- Ensure such records are kept confidentially and securely and separate from the child's educational record
- When a child leaves our Provision the Designated Safeguarding Lead will contact the Designated Safeguarding Lead at the new centre and will ensure that the safeguarding file is forwarded to the receiving centre within 5 working days. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving centre and/or evidence of recorded delivery.

Multi-agency working and information sharing:

- The DSL recognizes and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance
- Our Provision is not the investigating agency when there are child protection concerns. We will, however, contribute to the investigation and assessment processes as required. We recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings

Training:

The DSL will ensure all staff undertake appropriate annual updates in order to:

- Be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- Understand the assessment process for providing early help and intervention e.g. the continuum of need, preventative education and the local offer

- Have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these
- Be alert to the specific needs of students in need (as specified in section 17 of the Students Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, racialisation and subject to listening to or hearing domestic abuse
- Encourage a culture of listening to students and taking account of their wishes and feelings in any action the Provision takes to protect them
- Ensure each member of staff has read and understood the Provision's safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include the Provision's behaviour policy and the Provision's procedures for managing students who are absent from education, as well as the staff code of conduct, the child protection policy, responsibilities in relation to filtering and monitoring in relation to ICT and dealing with disclosures and managing allegation processes
- Organise face-to-face whole-Provision Safeguarding training for all staff members at least every three years
- The DSL will ensure their training remains in date (every 2 years)
- All staff should be aware of key policies within their Provision which supports safeguarding, and these should be explained to them as part of staff induction
- Ensure the Provision allocates time and resource every year for relevant staff members to attend training and receive continuous professional development opportunities
- Maintain accurate records of induction, ongoing training and continual professional development (CPD) relating to safeguarding

Awareness raising:

- Ensure our Provision's child protection policies are known, understood and used appropriately
- Ensure our Provision's safeguarding policy is reviewed annually (as a minimum) and the procedures are updated and reviewed regularly
- Ensure our safeguarding policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the Provision in this. Ensure that all staff are aware of the Provision's policy on ICT and understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Quality assurance:

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding files (at a minimum once a year)
- Provide regular reports to the Manager detailing changes and reviews to policy, training undertaken by staff members and the number of students with child protection plans and other relevant data
- Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements

Support for staff:

The Provision will have a framework for providing an opportunity for staff who are working directly with vulnerable young people to have regular access to an appropriate manager to talk through and reflect on their involvement with the child's case.

APPENDIX B: Safeguarding Procedures

Definitions:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or students.

Students are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE applies to providers of post 16 education as set out Education and Training (Welfare of Students) Act 2021.

Child protection is part of safeguarding and promoting the welfare of students and refers to activity undertaken to protect specific students who are suffering, or likely to suffer, significant harm or significant harm is suggested.

Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.

Harm is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

Safeguarding students is the action we take to promote the welfare of students and protect them from harm.

Safeguarding and promoting the welfare of students is defined as:

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

Provision staff are particularly important, as they are in a position to identify concerns early, provide help for students, promote students's welfare and prevent concerns from escalating (KCSIE 2025).

A bespoke helpline is available for students and young people who've experienced abuse at Provision, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on 0800 136 663

Significant harm is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Students Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development; his health or development shall be compared with that which could reasonably be expected of a similar child.'

Vulnerable students: Any child may benefit from Early Help and the Buckinghamshire Safeguarding Students Board, but all Provision staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

CATEGORIES OF ABUSE:

Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

It may include:

- not giving the child opportunities to express their views
- deliberately silencing them or 'making fun' of what they say or how they communicate

It may feature:

- age or developmentally inappropriate expectations being imposed on students
- interactions that are beyond a child's developmental capability
- overprotection and limitation of exploration and learning
- preventing the child from participating in normal social interaction
- seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing students frequently to feel frightened or in danger or the exploitation or corruption of students
- Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect is the persistent failure to meet a child's basic physical 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 misuse.

Once a child is born, it may involve a parent failing to:

- provide adequate food, clothing and shelter, including exclusion from home or abandonment
- protect a child from physical and emotional harm or danger
- ensure adequate supervision, including the use of inadequate care givers
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered.

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not

the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other students. The sexual abuse of students by other students is a specific safeguarding issue in education (KCSIE 2025).

MENTAL HEALTH:

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these students's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

APPENDIX C: Further information

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM.

Indicators - There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the role of centres and

colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to centers and colleges.

Actions - If staff have a concern, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and students's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

Mandatory Reporting Duty -From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Provision's designated safeguarding lead and involve the MASH as appropriate.

Fabricated or Induced Illness

Staff must be aware of the risk of students being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history
- fabrication of signs and symptoms and falsification of hospital charts and records and specimens of bodily fluids. This may also include falsification of letters and documents
- induction of illness by a variety of means

Where this is identified and considered a risk a referral will be made to the MASH for support and guidance. Provision may involve other agencies in making their assessments. That could include community paediatrician and occupational therapists for example.

Gang and Youth/Serious Violence

Students and Young People who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and

professionals have a responsibility to safeguard these students and young people and to prevent further harm both to the young person and their potential victims. Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence and substance misuse.

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

A number of the indicators for CSE (Child Sexual Exploitation) and CCE (Child Criminal Exploitation) may be applicable to where students are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are students who: go missing and are subsequently found in areas away from their home have been the victim or perpetrator of serious violence (e.g. knife crime)

Faith Based Abuse

Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

'Not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye, or djinns, dakini, kindoki, ritual or multi murders and use of fear of the supernatural to make students comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'

When this type of abuse is suspected staff will make a referral to the MASH Team for support and guidance.

Modern Slavery, Trafficking & Exploitation

Strive recognizes that students can be victims of modern slavery and trafficking.

This includes:

- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines activity
- Domestic servitude
- Forced labour
- Forced criminality
- Online exploitation and grooming

Under the Modern Slavery Act 2015, students cannot consent to any form of exploitation.

Staff must be alert to indicators including:

- Going missing or unexplained absences
- Sudden possession of money, gifts or new items
- Associations with older individuals or unknown adults
- Being transported around the country for unknown reasons
- Signs of fear, control, intimidation or threats
- Online contact with unknown individuals

Concerns must be reported immediately to the DSL, who may:

- Refer to MASH
- Make a referral to the National Referral Mechanism (NRM)
- Liaise with the Local Authority
- Contact police where required

Modern Slavery is an umbrella term that covers the offences of human trafficking and slavery, servitude and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Strive endeavours to ensure that no modern slavery or trafficking in any form is taking place in our supply chains or in any part of our Provision.

Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Students, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

“Trafficking of persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.

The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in sub-paragraph (a) of this article

“Child” shall mean any person under eighteen years of age.

Students trafficked into the country may be registered at Provision for a term or longer, before being moved to another part of the UK or abroad. This pattern of

registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in Provisions which are situated near ports of entry, but practitioners should be alert to this possibility in all Provisions. However, practitioners should always bear in mind that not all students who go missing from education have been victims of trafficking. For example, there may be instances of students from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from Provision.

If a member of the Provision staff suspects that a child may have been trafficked, they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or local authority students' social care are contacted immediately.

Risks Associated with Parent/Carer Mental Health

The majority of parents who suffer mental ill-health can care for and safeguard their students and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their students.

Our approach is to recognise, seek support, instil preventive factors and monitor. Designated Safeguarding Lead should seek support through Early Help team but escalate to the MASH Team if they are concerned that the child involved is being placed at immediate risk of harm.

Drugs and Alcohol

Students can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they effect family life at home through use by parents/carers, siblings, child-minders etc. Risks associated with drugs and alcohol and should be built into the curriculum policy.

Honour Based Violence and Forced Marriage

Honour Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Violence can occur when offenders perceive that a relative has shamed the family or community by breaking their 'code of honour'. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

For more information see:

Managing Allegations against Provision Staff (including those accessing the Provision premises & Volunteers)

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with students and young people within 24 hours. This includes allegations relating to individuals or organisations using the Provision premises for the purpose of running activities for students (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, our Provision will follow our safeguarding policies and procedures, including informing the LADO.

Senior Team should refer to this guidance if there is an allegation against the Manager.

This includes all cases that meet the harm threshold where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or students in a way that indicates they may pose a risk of harm to students
- behaved or may have behaved in a way that indicates they may not be suitable to work with students. This includes behaviour that may have happened outside of the Provision, that might make an individual unsuitable to work with students and is known as transferable risk. Where appropriate an assessment of transferable risk to students with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO)

There are two levels of allegation/concern:

1. allegations that may meet the harms threshold (see definition above)
2. allegation/concerns that do not meet the harm threshold – referred to in 2023 guidance as low level concerns'

Proprietors / Directors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint

or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is important that Provisions have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard students.

‘Low Level Concerns’ - Creating a culture in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the Provision may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with students
- having favourites
- taking photographs of students on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating students

Such concerns should always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The Local Authority Designated Officer is contactable by phone on 01296 382 070

A LADO Referral Form must be completed by the Head of Operations in full and forwarded to the LADO via email within 24 hours of the concern being raised.

Preventing Radicalisation

Protecting students from the risk of radicalisation should be part of Provision’s wider safeguarding duties and is similar in nature to protecting students from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such

as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in students's behaviour which could indicate that they may need help or protection. Provision staff should use their professional judgement in identifying students who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

The statutory Prevent guidance summarises the requirements on centres in terms of four general themes:

1. risk assessment
2. working in partnership
3. staff training
4. IT policies

Provisions are expected to assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting students and young people in the area and a specific understanding of how to identify individual students who may be at risk of radicalisation and what to do to support them. Provisions should have clear procedures in place for protecting students at risk of radicalisation. It is not necessary for Provisions to have distinct policies on implementing the Prevent duty. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all centres should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Students Board.

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales.

The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas. Individual centres are best placed to assess the training needs of staff in the light of their assessment of the risk to students at the centre of being drawn into terrorism. As a minimum, however, Provisions should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting students from the risk of radicalisation.

Provisions must ensure that students are safe from terrorist and extremist material when accessing the internet in Provision. Provisions should ensure that suitable filtering is in place. It is also important that Provision teach students about online safety more generally.

The Department for Education has also published advice for Provisions on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support.

Channel

Provision staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for Provisions to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are at risk of being drawn into terrorism and, where considered appropriate and necessary, consent is obtained and support arranged and provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual.

Provisions are required to have regard to Keeping Students Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here:

Students Who Are Absent from Education

All students, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of students of compulsory centre age who are absent for prolonged periods or missing from education in their area.

Students being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and criminal exploitation - particularly county lines. Provision staff should follow the Provision's procedures for dealing with students who are persistently absent and students missing education to identify such abuse as early as possible and, in the case of absent students, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where students are already known to local authority

students's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve centre attendance' for further guidance.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all Provisions to have an admission register and, with the exception of Provisions where all students are boarders, an attendance register. All students must be placed on both registers. An appropriated response is needed when a child has poor attendance or is regularly missing education.

All Provisions must inform their local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of Provision by their parents and are being educated outside the Provision system e.g. home education, have ceased to attend Provision and no longer live within reasonable distance of the Provision at which they are registered
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend Provision
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the centre at the end of the period
- have been permanently excluded

The local authority must be notified when a Provision is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that Provisions comply with this duty, so that local authorities can, as part of their duty to identify students of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Provision must inform the local authority of any pupil who fails to attend Provision regularly or has been absent without the Provision's permission for a continuous period of 10 centre days or more, at such intervals as are agreed between the Provision and the local authority.

Child Sexual Exploitation & Child Criminal Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child

into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and students or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be treated as exploitation. As well as being physical, it can be facilitated and/or take place online.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can students who have older boyfriends or girlfriends and students who suffer from sexually transmitted infections or become pregnant.

Child Criminal Exploitation (CCE)

While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

County Lines is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines.' They exploit

students and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives, and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Sexual Harassment, Violence, Harmful Sexual Behaviours (inc. child on child abuse, consent and 'upskirting')

Sexual violence and sexual harassment can occur between two students of any age and sex. It can also occur through a group of students sexually assaulting or sexually harassing a single child or group of students. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that Provisions are aware of sexual violence and the fact students can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of Provision. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment and harmful sexual behaviour in the context of developing a whole-centre safeguarding culture, where sexual misconduct is seen as unacceptable and not 'banter' or an inevitable part of growing up.

It should be recognised that these issues are likely to occur and so Provisions should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+) or are perceived by peers to be LGBT+ and students with SEND. We recognise that these students can be targeted by other students, so it is vital your Provision provides a safe space for these students to speak out and share their concerns with members of staff. Students are protected from 'upskirting', bullying, homophobic, biphobic and transphobic behaviour, racism, sexism and other forms of discrimination. Staff

have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

Our Provision acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and students are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Provisions must record incidents across the whole spectrum of sexual violence, sexual harassment and harmful sexualised behaviours so that they can understand the scale of the problem in their own centres and make appropriate plans to reduce it.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the centre's pastoral system, their wishes and feelings considered, and they understand the law on child-on-child abuse is there to protect them, not criminalise them.

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with students and young people.

Upskirting

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual consent- a child under the age of 13 can never consent to any sexual activity, the age of consent is 16.

Online Safety, Remote Learning and Filtering & Monitoring

It is essential that students are safeguarded from potentially harmful and inappropriate online material. An effective whole centre approach to online safety empowers a Provision to protect and educate students, students and staff in their

use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

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

1. content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
2. contact: being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as students or young adults with the intention to groom or exploit them for sexual, criminal, financial or other
3. conduct: online behaviour that increases the likelihood of, or causes, harm, for example, 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
4. commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org>)

The Provision has an Online Safety policy, which covers the use of mobile phones, cameras and other digital recording devices e.g. iPads. For online safety, within the policy there is support about students accessing the internet whilst they're at Provision using data on their phones. This considers that many students have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some students, whilst at Provision, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within Provisions ICT Policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance of online safety, including making parents aware of what the centre asks students to do online (e.g. sites they need to visit or who they'll be interacting with online).

Filters and monitoring

Managers and Proprietors are doing all that they reasonably can to limit students's exposure to the above risks from the Provision's IT system. As part of this process, managers and proprietors ensure their Provision has appropriate filters and monitoring systems in place and that there is regular review of their effectiveness. Whilst considering their responsibility to safeguard and promote the welfare of students and provide them with a safe environment in which to learn, governing bodies and proprietors also consider the age range of their students, those who are

potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The appropriateness of any filters and monitoring systems are a matter for individual centres and will be informed in part, by the risk assessment required by the Prevent Duty.

To support centres to meet this duty, the Department for Education has published filtering and monitoring standards which set out that centres should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

Senior leaders and proprietors understand their responsibilities for periodically reviewing the effectiveness of these procedures and the standards and will discuss this with IT staff and service providers, discussing what more needs to be done to support centres in meeting this standard. This includes an understanding of responsibilities to have an appropriate level of security protection and an understanding of evolving cyber-crime technologies and e-security.

Pre-Appointment Checks and Safer Recruitment

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, Provisions must:

- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website

- if the person has lived or worked outside the UK, make any further checks the Provision considers appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation
- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained

In addition:

- independent centres, including academies and free centres, must check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- maintained centres must check that the Director of Education is not subject to a section 128 direction made by the Secretary of the State
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks, or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012
- all centres providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes or in wraparound care for students up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

The Education and Training (Welfare of Students) Act 2021 extended safeguarding provisions to providers of post 16 Education: 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

Single Central Record

At the Provision we keep a single central record. The single central record must cover the following people:

- all staff (including supply staff and teacher trainees on salaried routes) who work at the Provision
- the information that must be recorded in respect of staff members (including teacher trainees on salaried route) is whether the following checks have been carried out or certificates obtained and the date on which each check was completed/certificate obtained
- an identity check / a barred list check / an enhanced DBS check / certificate / a prohibition from teaching check

- further checks on people who have lived or worked outside the UK– overseas checks/right to work
- a check of professional qualifications and a check to establish the person’s right to work in the United Kingdom

For supply staff, the Provision should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received.

The details of an individual should be removed from the single central record once they no longer work at the centre.

Senior Leadership Team at the Provision are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the Manager to apply for the certificate for any of their governors who does not already have one.

Governance is not a regulated activity and so they do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

END OF POLICY

Monitoring & Review

This policy will be reviewed annually or sooner if legislation, statutory guidance or local authority expectations change. The Head of Operations is responsible for ensuring timely review and communicating all updates to staff.

Version Control

Version	Date	Changes Made	Approved By
2025.1	July 2025	Full restructure & update to 2025 legislation	Directors of Strive AP (via S. Hickey)
2026.1	March 2026	Updates to Working together to Safeguard Students 2023	Directors of Strive AP (via S. Hickey)