

Child protection and Safeguarding Policy VI.5

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1: Important contacts:

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Jadie Wardle	Jadie.wardle@cloverlearning.org.uk 0116 278 6916
Deputy DSL	Lisa Paine	Lisa.paine@cloverlearning.org.uk 0116 278 6916
Local authority designated officer (LADO)	Kim Taylor	Kim.taylor@leics.gov.uk 0116 305 5641
Channel helpline		020 7340 7264

2: Aims:

Clover Learning Community aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote student's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues (including online safeguarding issues)
- The DSL will always be on site or contactable by telephone

3: SUMMARY - THE MAIN FEATURES

Trained staff members:	Jadie Wardle	Lisa Paine
Training to be renewed:	Before 14 May 2027	Before 14 May 2027
Training provider:	Leicestershire County Council	Leicestershire County Council

Clover Learning Community ensures that:

- All staff, volunteers and supply staff have been recruited safely and have undertaken a DBS check
- All staff, volunteers and supply staff know in broad terms what to look for and listen out for in order to safeguard the young people at Clover Learning Community
- There is a Designated Senior Leader (DSL) who acts as a focus for any safeguarding concerns and ensures that any safeguarding issues are reported to the Commissioner or in urgent circumstances to police or social care
- The DSL keeps up to date with changing expectations of safeguarding
- There is a clear system for staff, volunteers and supply staff to report any concerns swiftly to the DSL. Staff, volunteers and supply staff understand that they should listen carefully to any disclosures, take care not to question the person disclosing other than to clarify and keep a note of concerns
- When students are taken off-site to further their learning Clover Learning Community will ensure that there is a stringent level of safeguarding in place, this will include a risk assessment of the journey there and back, as well as the location. Please refer to the Transport and driving policy for measures that take place when transporting students. The Supervision policy and the Educational trips and visits policy will be adhered to.
- There is a clear system to ensure that children and young people do not go to any other locations for activities during the time that they are assigned to the provision unless Clover Learning Community are certain that the location has a stringent level of safeguarding and that the Commissioner is aware.
- There is a clear system for monitoring the children and young people when assigned to the provision to ensure that they do not put one another at risk and to ensure that they cannot misuse IT and internet privileges.

If Clover Learning Community have any incidents that give them concern about the safety and welfare of a student whilst at the provision the Commissioner will be contacted appropriately.

If a student might have:

- Brought a knife or other weapon to the provision
- Brought drugs or alcohol to the provision
- Been involved in any serious aggression towards other students or staff
- Accessed unauthorized sites on the internet whilst at the provision
- Becoming involved in any serious incidents of bullying, sexism, racism
- Tried to influence or come under the influence of others to become involved in criminal, racist or sexist behaviour
- Been on the receiving end of emotional, physical or sexual abuse
- Displaying signs of mental health issues
- Displaying sign of physical health/development

The Commissioner should be contacted.

4: Named staff and contacts

- **Designated Safeguarding Lead:** Jadie Wardle
- **Deputy Designated Safeguarding Lead:** Lisa Paine
- **Prevent Single Point of Contact (SPOC):** Jadie Wardle

Safeguarding and Improvement Unit contacts at Leicestershire County Council:

Clover Learning Community will ask the commissioner when students are referred to provide the contact details of the relevant safeguarding staff at the provision, in case they need to be contacted. The Leicestershire Secondary Education and Inclusion Partnership Coordinator (**Oakfield Short Stay Secondary School**) will be reported of any concerns in addition to any direct action that is taken. The contact details for the partnership are listed below:

Marcus Snook HBEP	Marcus.snook@leics.gov.uk
Alison Hodges NLCIP	Alison.hodges@leics.gov.uk
Helen Masoum MSCIP	Helen.masoum@leics.gov.uk
Simon Chetwyn NWLIP	Simon.chetwyn@leics.gov.uk
Elise Rogers SLIP	Elise.rogers@leics.gov.uk

Service Manager – First Response

LADO / Allegations	
Kim Taylor	0116 305 5641
Lovona Brown	0116 305 8161
Development Officers	
Charlotte Davis	0116 305 6814
First Response Children's Duty (Same-day referrals)	
Service Manager	kay.fletcher@leics.gov.uk
Kay Fletcher	0116 3055138
Telephone	0116 305 0005
Email	childrensduty@leics.gov.uk
Address	First Response Children's Duty
	Room 100b, Pen Lloyd Building, County Hall
	Championship Way
	Glenfield LE3 8RF
All other referrals including Early Help Services	
http://lrsb.org.uk/childreport	This contact information is for children and young people who reside in the county of Leicestershire. Those with residence in the City of Leicester should be referred to the equivalent services provided by the City Council
Email	earlyhelpreferrals@leics.gov.uk
Telephone	0116 305 8727
CAMHS advisory service for professionals	0116 295 5048
Leicestershire Ed Psychology Service	0116 305 5100
UAVA Professionals Advice and Referrals	0116 255 0004

5: Introduction

Clover Learning Community fully recognises the contribution it can make to protect children and support students attending our organisation. The aim of the policy is to safeguard and promote our students' welfare, safety and health by fostering an honest, open, caring and supportive climate. The students' welfare is of paramount importance. Staff are aware that the students at Clover Learning Community have additional needs including mental health needs. These needs can make the students vulnerable to exploitation.

This policy is based on:

The Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained schools governance guide](#) and [Academy trust governance guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on 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 pupils
- [The School 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 have completed safer recruitment training
- 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 age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

Safeguarding and promoting the welfare of children means:

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

There are four main elements to our Child Protection Policy:

- **Prevention** (e.g. positive provision atmosphere, teaching and pastoral support to students, safer recruitment procedures);
- **Protection** (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns);
- **Support** (to students and provision staff and to children who may have been abused);
- **Working with parents** (to ensure appropriate communications and actions are undertaken).

Staff and volunteers are asked to consider the 5 R's in relation to safeguarding.

- **Recognition** The ability to recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on the premises of the provision, in the home or in any other setting in which the learner may find themselves. All those playing a role in meeting the student needs should be aware and informed so that possible abuse can be recognised, investigated and acted on seamlessly and effectively. Signs and indicators of abuse in students may include direct disclosure. A student may choose anyone in the provision to disclose to, all staff are trained to recognise and respond to this situation, and how to report a concern. Staff must be vigilant and, rather than waiting for a disclosure, recognise young people may not always make a direct report and information may come from overheard conversations or observed behaviour changes. Staff must be aware that that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. All staff are made aware the importance of building secure and trusted relationships.
- **Response** - No report about possible abuse or neglect should ever be ignored. Staff are trained to respond appropriately. Any disclosure is recorded using the incident report form (see Appendix 6). The form is a guide for the member of staff who is dealing with the disclosure. Staff are trained to ensure they are calm, effectively empathetic, ask closed questions and gather enough information to pass on the disclosure. Staff are trained to not promise about what will happen next or that they will not yell anyone. If the student is in danger the DSL will be informed as soon as possible. Staff are able to reassure victims that they are being taken seriously and that they are supported and kept safe. The student who is disclosing the incident that they are creating a problem or be made to feel ashamed for making a report.
- **Report** – Report your concerns to the DSL in the first instance (even if this is a professional curiosity about a concern). Staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to a local authority children's social care. Once you have reported concerns about the abuse to the DSL it is their responsibility to take further action.
- **Recording** – staff record precisely what has been alleged, using key phrases and words the individual used. The incident report form will be used to record all information from the student making the disclosure. This record is passed on, in person where possible, to the DSL, it will be securely, and separately to students' individual files. The information is only accessible to those who have responsibility over safeguarding matters.
- **Referral** – The DSL will gather enough information to make a referral, if required by talking to the

appropriate people inside or outside the organisation, and a decision as to what action to take will be made. The referral will only be made by the DSL, discussions with outside agencies will only be discussed with the DSL and any further action will be taken by the DSL.

This policy applies to all staff, directors and visitors to our organisation. We recognise that child protection is the responsibility of **all staff**. At Clover Learning Community we will ensure that all parents and other working partners are aware of our Safeguarding policy by mentioning it in our induction to new staff, regular updates to all staff and visitors will be briefed. The website alongside student inductions and meetings with parents will raise awareness.

Extended activities

Where external agencies or bodies come to Clover Learning Community to provide services or activities and are self-employed, those individuals will be added to the Clover Learning Community Single Central Register. They will have an enhanced DBS with barred list check through Clover Learning Community before they perform any regulated activity.

6: Definitions

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, and to protect specific children who are suspected to be suffering, or being 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

The different types of abuse, including neglect, are:

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

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

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to; provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

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

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

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

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

7: Equality statement

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- 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 (see section 12)
- Are missing or absent from education for prolonged periods and/or frequently

- Whose parent/carer has expressed an intention to remove them from school to be home educated

8: Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and volunteers in the provision and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended provision and off-site activities.

The provision plays a crucial role in preventative education. This is in the context of a whole-provision approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

8.1: All Staff working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the provision.

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- 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 children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct and behaviour policy, and E-safety policy, the role and identity of the designated safeguarding lead (DSL) and deputy and the safeguarding response to children who go missing from education/who are absent from education. The early help assessment process 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 child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- 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 children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

All staff know that they are in a position of trust in their role at Clover Learning Community. All staff know what this term means by law and follow this law.

8.2 The designated safeguarding lead (DSL)

The DSL is a member of the management team. Our DSL is Jadie Wardle – Head of Centre. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of provision hours, the DSL can be contacted on 07960241385.

When the DSL is absent, the deputy DSL (Lisa Paine) – will act as cover.

If the DSL and deputy are not available, Lily Fearn, Office Manager will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Jadie Wardle DSL is the Prevent lead and ensures that staff have appropriate Prevent training and induction

The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search. Keep detailed, accurate and secure written records of **all** concerns, referrals and outcomes;
- Obtain access to resources and effective training for all staff and attend refresher training courses provided by the commissioner. Keep up to date with new developments in safeguarding by accessing briefings and journals at least annually.
- Maintain and monitor child protection records, including monitoring and acting upon individual concerns, patterns of concerns (e.g. children who repeatedly go missing) or complaints, in accordance with the section on "Records, Monitoring and Transfer" below.
- Ensure attendance registers are monitored and acted upon if a student is missing education regularly. Student absence can be a warning sign for a range of safeguarding concerns, such as sexual abuse, sexual exploitation or child criminal exploitation.
- The DSL will ensure that DSL training is updated every 2 years within the Leicestershire County Council.
- Keep strong local network relationships with the following agencies and other relevant agencies: the Leicestershire County Council, The Safeguarding Community and other local DSL's.

8.3: The Head of Centre

The Head of Centre is responsible for the implementation of this policy, including:

- Ensuring that staff (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
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns

8.4: Proprietors

In accordance with the Statutory Guidance "Keeping children safe in education" September 2025, the Proprietor will ensure that:-

- Clover Learning Community has a Safeguarding Policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly.
- Clover Learning Community operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, staff involved in the recruitment process have undertaken Safer Recruitment Training.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers (see Appendix 2).
- There is a senior member of Clover Learning Community who is designated to take lead responsibility for dealing with child protection (the "Designated Safeguarding Lead") and there is always cover for this role with appropriate arrangements for before/after provision and out of term time activities.

- The Designated Safeguarding Lead undertakes effective training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
- The staff and volunteers who work with children, undertake appropriate training which is regularly updated (at least every three years in compliance with the LSCB protocol); and that new staff and volunteers who work with students are made aware of the Clover Learning Community arrangements for child protection and their responsibilities (including this policy and Part 1 of Keeping Children Safe in Education). The Local Authority Induction leaflet, "Safeguarding in Education Induction – Child Protection Information, Safer Working Practice" September 2018 will be used as part of this induction.
- Any deficiencies or weaknesses brought to the attention of the Proprietor will be rectified without delay.
- The proprietor deals with any allegations of abuse made against the senior leader of the organization.
- Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers - "Guidance for Safer Working Practice for those who work with children in education settings" May 2019". Information is provided to LEBC on this practice at their annual audit carried out on behalf of schools and Partnerships
- The Clover Learning Community contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" 2018 as requested by the commissioner. Safeguarding arrangements take into account the procedures and practice of the local authority and the Local Safeguarding Children Board (LSCB).

9: Recognising abuse and taking action

All staff 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 child who:

- Has a disability
- 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

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean ‘the DSL (or deputy DSL)’.

9.1 If a child 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 child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

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

GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

9.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to 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 children may:

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

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

9.3 If you discover that FGM has taken place or a pupil 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 pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher 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 teachers will face disciplinary sanctions for failing to meet it.

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

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

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

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

Figure 1 below illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or 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 an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

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

GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

9.5 If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include 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 school staff and governors can call to raise concerns about extremism with respect to a pupil. 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

9.6 If you have a concern about mental health

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

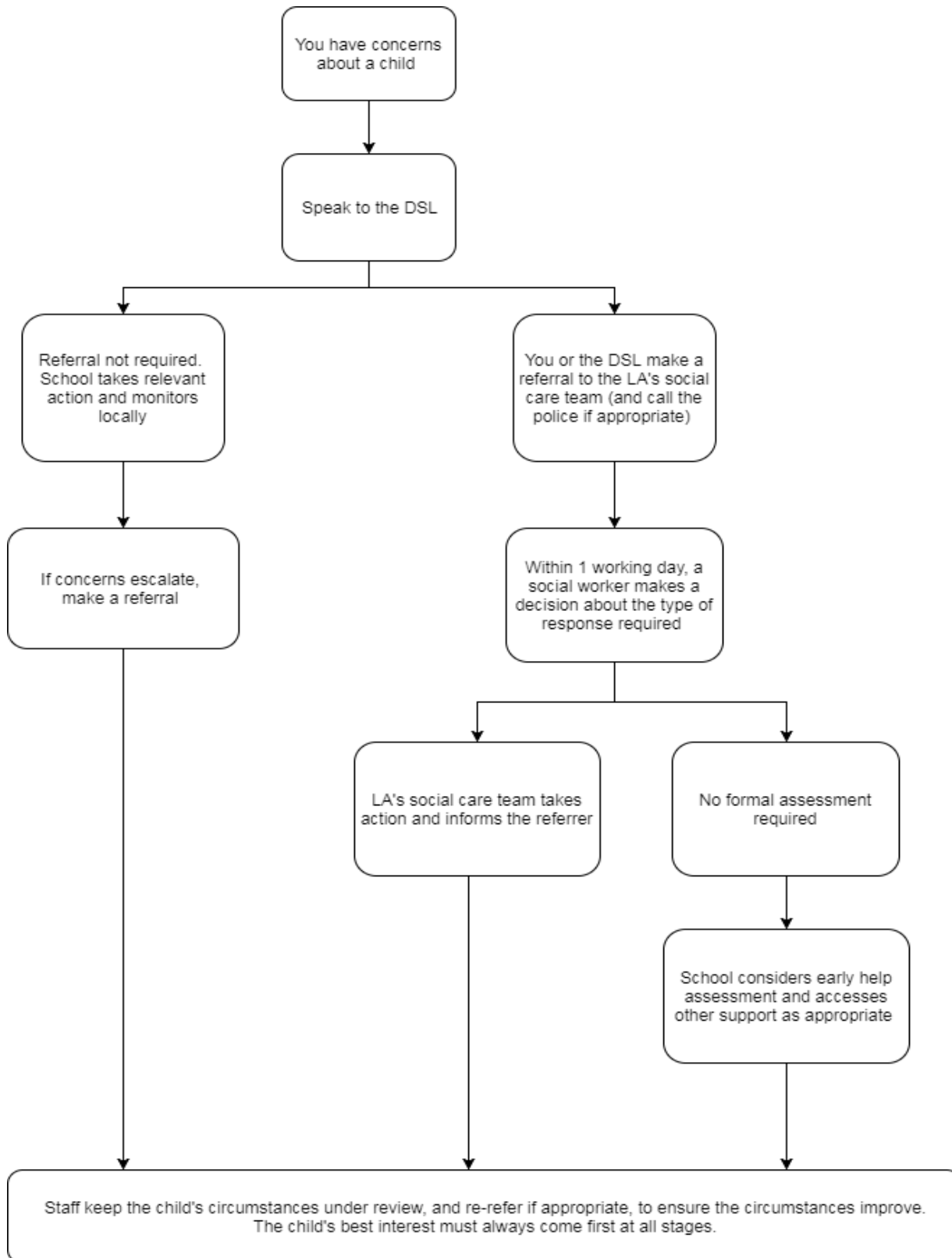
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following: **GOV.UK webpage for reporting child abuse to your local council:** <https://www.gov.uk/report-child-abuse-to-local-council>

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

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section **referral** 9.4 for what to do.)



9.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the head of centre, speak to the local authority designated officer (LADO).

The headteacher/proprietor will then follow the procedures set out in appendix 3, if appropriate.

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

9.8 Allegations of abuse made against other pupils

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

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s 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 pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

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

If a pupil 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 children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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 children 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 in school 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 pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school 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

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

This is a suggested approach based on [guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology](#) for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil 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 pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(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 pupil(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 school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to 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 pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils 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 child to groom or exploit a child or 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 their 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 pupil in the images or videos is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

If at any point in the process there is a concern that a pupil 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 pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police inform the DSL and inform the commissioner that you are doing so.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Curriculum coverage

The below is provided as an example of how you might demonstrate the way your curriculum covers the sharing of nudes and semi-nudes. Insert details of your own approach here.

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE education. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

9.10 Reporting systems for our students

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

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

To achieve this, we will:

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

10: Online safety and the use of mobile technology

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

To address this, Clover Learning Community aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our curriculum. 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 pupils 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. All staff members will receive refresher training as required and at least once each academic year

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Have in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the provisions IT systems. (Clover Learning Community use: Ubiquiti Unifi Dream Pro Gateway)
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our provision community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our E safety policy.

10.1 Artificial intelligence (AI)

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

Clover Learning Community recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Clover Learning Community will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by Clover Learning Community. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

11: Records, Monitoring and Transfer

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within our organisation. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies or back to the commissioner.

Information about students, will be treated with the strictest confidence. Only relevant staff will have access to this information.

- Electronic information will be stored with a two-factor authentication process.

- Paper information will be stored behind 2 locked areas, only senior staff will have access to this information.
- Information will be kept for 6 years.
- Electronic information will be deleted appropriately from all files.
- Paper information will be shredded appropriately.

Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

Child protection records are stored securely, with access confined to specific staff, e.g. Designated Safeguarding Leads and the Proprietor. Commissioners are always informed of any new information being placed on record and have the responsibility to ensure that such information follows the student if he or she moves on to another setting or location.

Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.

All records kept about students will adhere to the GDPR guidelines (refer to the Data Protection Policy for further information). It must be noted that fears about sharing information must not stand in the way of the welfare of the child. Speak to the DSL if in any doubt.

12: Support to students

Clover Learning Community recognises that students who have SEND (diagnosed or undiagnosed) require additional support and attention. We understand that students require extra support when communicating with staff or volunteers.

We recognise that students who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children Clover Learning Community may be one of the few stable, secure and predictable components of their lives. Other students may be vulnerable because, for instance, they have a disability, are in care, they are a carer themselves, have been previously looked after or are experiencing some form of neglect. Staff at Clover Learning Community understand that abuse can occur outside of a student's family / family home or online, for example, children can be vulnerable to sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. At Clover Learning Community seeks to remove any barriers that may exist in being able to recognise abuse or neglect in students with Special Educational Needs or a disability. We will seek to provide such students with the necessary support and to build their self-esteem, confidence and mental health.

Child on child Abuse - Clover Learning Community recognises that children sometimes display abusive behaviour themselves and that such incidents or allegations must be referred on for appropriate support and intervention. Such abuse will not be tolerated or passed off as "banter" or "part of growing up". This abuse could for example include sexual violence and sexual harassment, initiation/hazing type violence, all forms of bullying, cyber bullying, upskirting, aggravated sexting and physical violence experienced by both boys and girls and witnessing / hearing the ill-treatment of others. This kind of abuse extends to intimate relationship between peers. There are separate provision and local authority or LSCB guidances and policies to address these concerns including the Behaviour Policy, Anti-bullying Policy, E-safety Policy, "Guidance for schools working with children who display harmful sexual behaviour" (Leicestershire LA Guidance). Where specific risks are identified, a risk assessment will be undertaken in consultation with the commissioner in order to ensure the safety of all staff and students.

Sexting – Our organisation will always respond if informed that children have been involved in 'sexting' (youth produced sexual imagery; sharing nudes or semi-nude images/video). The UK Council for Child Internet Safety (UKCCIS) guidance, "Sexting in schools and colleges: responding to incidents and safeguarding young people" will be used to guide the organisation's response on a case by case basis and we will always discuss and agree any actions that we

intend to take with the commissioner.

Sexual violence and sexual harassment – Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003 including rape and sexual assault. Sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline and may include sexual name-calling, taunting or “jokes” and physical behaviour, for example, deliberately brushing against someone or interfering with clothes. Evidence shows that girls, children with SEND and LGBT children are more likely to be the victims of sexual violence and harassment and boys are more likely to be the perpetrators. However sexual violence and sexual harassment can occur between children of any gender. Sexual violence and sexual harassment can happen in or outside of the setting as well as online and the need for ‘it could happen here’ approach is carried out here at Clover Learning Community. Staff are made aware that a student who has witnessed or heard this type of harassment is impacted also. Our organisation may support children and young people in learning about “healthy and respectful behaviours” as part of the curriculum for PSHE when we have agreed with the commissioner to deliver this as part of our provision. The provision’s response to the student’s report will be taken with the utmost care; the student will be supported. Should the perpetrator be a student at Clover Learning Community the student will safeguard both the victim and the alleged perpetrator. In any case the commissioner will be contacted in the first instance.

Children Missing from Education – our organisation recognises the entitlement that all children have to education. If we have any reason to think that a young person attending our organisation is not receiving their educational entitlement we will raise it with the commissioner. We recognise that children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Clover Learning Community recognises that our student cohort fall into those most at risk of missing education. Daily attendance registers, both am and pm are required by our commissioners using our service. Refer to Attendance Policy for further guidance.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point or are targeted by criminals involved in the illegal supply of drugs (County Lines). It must be noted that forcing a child to take part in sexual activities do not necessarily involve violence (this can include being a witness or hearing abuse on others). Staff training includes raising awareness of this issue and any concerns are passed to the Designated Safeguarding Lead who will make a risk assessment and refer to Local Authority First Response Children’s Duty if appropriate.

So-called ‘honour-based’ violence & Forced Marriages - (HBV/A) encompasses crimes which have been committed to protect or defend the so-called “honour” of the family and/or the community, including Female Genital Mutilation (FGM) (see appendix 5), forced marriage, and practices such as breast ironing. Forced Marriages can occur under duress and where consent is not given freely by the young person. In 2019 the Forced Marriage Unit handled 1,355 cases. All forms of so-called HBV are abuse (regardless of the motivation) and concerns will be passed to the Designated Safeguarding Lead for onward referral as required.

Private fostering arrangements - Where a child under 16 (or 18 with a disability) is living with someone who is not their family or a close relative for 28 days or more, staff inform the Designated Safeguarding Lead and on to the commissioner so that a referral to Children’s Social Care for a safety check, can be made. (A close relative includes step-parent, grandparents, uncle, aunt or sibling). Complaints or concerns raised by parents or students will be taken seriously and followed up in accordance with the provision’s complaints process.

Contextual Safeguarding - Contextual safeguarding, recognises that as young people grow and develop, they are influenced by a whole range of environments and people outside of their family. For example, in provision or college (peer group abuse), in the local community (gang violence or knife crime) or online (risk of child sexual exploitation) including young mothers. Children and young people may encounter risk in any of these environments. Sometimes the

different contexts are inter-related and can mean that children and young people may encounter multiple risks. Contextual safeguarding looks at how we can best understand these risks, engage with children and young people and help to keep them safe. It's an approach that's often been used to apply to adolescents, though the lessons can equally be applied to younger children.

County Lines - County lines is the term used by police and partners for urban gangs supplying drugs to suburban and rural areas, market and coastal towns using dedicated mobile comp lines. Gangs use children and young people to move drugs and money to and from the urban area. It is a major cross-cutting issue involving drugs, violence, gangs, safeguarding, exploitation, modern slavery and missing persons. Our organization recognizes the signs for county line and will always work towards a multiagency response.

Child Criminal Exploitation (CCE) - occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. As a provider we recognize using tools such as contextual safeguarding alongside an understanding of the different ways in which children may be exploited will support us in recognizing and responding to CCE. It is important to note that the experience of girls can be very different to that of boys who are being criminally exploited. Girls may be at higher risk of sexual exploitation.

Domestic Abuse impacting children and young people - The impact of domestic abuse on children and young people can have a devastating that can last into adulthood. One in seven (14.2%) children and young people under the age of 18 will have lived with domestic violence at some point in their childhood (Womens Aid 2018). A child who has witnessed or heard domestic violence taking place is also under harm. The harm is caused to their health, well-being, development, and ability to learn.

Emotional abuse - makes behaviour that is 'controlling or coercive' towards another person in an intimate or family relationship punishable by a prison term of up to five years. There are a variety of types of behaviour that could be classed as emotional abuse. These include: intimidation and threats, criticism, undermining, being made to feel guilty, economic abuse and telling what you can or can't do.

Pupils who are lesbian, gay, bisexual or gender questioning – We recognise that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. **See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.** We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns from staff should be reported to the DSL. When families/carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism 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 children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

Upskirting is a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. The Voyeurism Act outlaws 'upskirting' where the purpose is to obtain sexual gratification, or to cause humiliation, distress or alarm. This includes instances where culprits say images were just taken 'for a laugh' or when paparazzi are caught taking intrusive images. It creates 2 new offences under the Sexual Offences Act 2003.

Cyber crime is a criminal activity using computers and or/the internet. Cyber-enabled crimes are crimes that can happen off-line but are enabled at scale and at speed on-line). Cyber-dependent crimes can only be committed by using a computer. Cyber-dependent crimes include: unauthorised access to computers (illegal 'hacking'), denial of Service

attacks or 'booting' – these are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic; and making supplying or obtaining malware such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Online safety students are safeguarded from potentially harmful and inappropriate online material. The risk to students is categorised into four areas: content – being exposed to illegal, inappropriate or harmful content, contact – being subjected to harmful online interaction with other users, conduct – personal online behaviour that increases the likelihood of, or causes harm, commerce – risks such as gambling, inappropriate advertising, phishing and or financial scams. Clover Learning Community has a filtering system (Ubiquiti), which blocks harmful content for students. The filtering system applies to the network when students use the provisions IT equipment and when students access the student wi-fi network. For more information, please refer to the E-safety policy.

Prevent duty – children and young people are vulnerable to ideology and radicalisation. There are 3 categories that are used in relation to the Prevent Duty:

- Extremism - is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- Radicalisation - refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Terrorism - is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Clover Learning Community is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015).

The key points that we will work **with the commissioner** on:-

- Inform the DSL as soon as possible
- Support the victim as appropriate and in accordance with their best interests
- Inform all parents of involved student unless by doing so the student is put at risk
- Images will not be viewed by provision staff
- If provision is to deal with the matter, involve parents in ensuring the images are deleted
- If there is evidence of exploitation or the targeting of a vulnerable student, inform the police

13: Absconding procedure

Due to the nature of our students, sometimes situations may arise and the student will leave the premises without permission. We always endeavour to make every effort to prevent/de-escalate these situations.

- When a student leaves the premises we patrol the local area, however we do not chase, as we run the risk of the pupils going further afield, or will increase the level of risk of the pupil running across roads. We do, however, monitor from a distance or until no longer visible.
- If a student does not return and we have not had sight of the student(s) for 10 minutes then we contact the commissioner to report them missing, we then contact the parents/carers to report their child missing to the Police. (For LAC we are responsible for contacting the schools safeguarding coordinator who will contact Social Workers).
- If a parent/carer requests us to contact the Police we use 101 Non-emergency Number.
- We complete an incident/absconding form quoting the Police Log Number.
- We keep the commissioner completely updated and record all telephone calls and incidents in the Electronic Diary/Red Book, the incident/absconding and Police Log Number must be quoted each time an entry is made

- Refer to Appendix 6 for flowchart
- All information regarding absconding are monitored by the senior staff as these are recorded on the Absconding Data Base and will be used for further planning for a child/young person's, care, behaviour or Risk Assessment, where necessary.
- On return to the provision;
 - Inform the proprietors.
 - The commissioner will be informed. Social Worker by Safeguarding Coordinator (if Applicable)
 - Police informed of pupils return.
 - Post incident feedback will be initiated and fully documented in the electronic diary/red book quoting incident Number and Police Log Number. The student's Risk Assessment will be updated.
 - All documentation of absconding must always have Day, Date, Times, any persons who have been contacted with and an Incident Log Number.

Local Protocol and Procedures Children Safeguarding boards.

<https://resources.leicestershire.gov.uk/sites/resource/files/field/pdf/2021/4/7/children-missing-education-policy.pdf>

- Keeping Children safe in education (relating to concerns why the child absconded and potential Risk whilst not in the care of the School) – September 2025.
- Statutory Guidance on Children who run away or go missing from home or care – September 2020.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3.pdf

14: Working with parents/carers

It is the responsibility of the commissioner to:

- Ensure that parents/carers have an understanding of the responsibility placed on the schools , Partnerships and Providers for child protection by setting out its obligations in the school prospectus.
- Undertake appropriate discussion with parents/carers prior to involvement of Children & Family Services Children's Social Care or another agency, unless to do so would place the child at risk of harm or compromise an investigation.
- At the time when the DSL at Clover Learning Community reports a concern to the commissioner a check will be made to ensure that there is a clarity about who will inform parents/carers and when. If Clover Learning Community makes an emergency contact with child protection agencies this will be followed by contact with the commissioner to ensure the same clarity.

15: Support for Staff

Staff are given time at the end of the day where they can brief other staff members on student behaviours, patterns and management practice. This promotes a safe culture where staff are given the opportunity to share concerns with each other. Supervision meetings are scheduled every month with the DSL as part of a staff supervision process.

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child/young person as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to the Designated Safeguarding Lead (DSL) about the support they require. The Designated Safeguarding Lead should seek to arrange the necessary support and may consult with the Commissioner if necessary. The Education Support helpline is available to all staff, staff are made aware in their training.

<https://www.educationsupport.org.uk/helping-you/telephone-support-counselling>

Harmful sexual behaviour support services. Available Monday to Friday 8am to 8pm, 0344 225 0623

If you have concerns about a member of staff, please refer to the Managing Allegations Policy.

16: Recruitment and Selection of Staff

The Proprietor takes note of advice on education of adults working with children in safer recruitment processes contained in the Statutory Guidance: ***Keeping children safe in education September 2025, Part Three: Safer recruitment.***

The Proprietor will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection / inappropriate conduct. Cases in which an allegation has been proven to be unsubstantiated, unfounded, false or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

The Provision has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction and are briefed on the code of conduct for adults working with children. The Leicestershire County Council induction leaflet is given to all staff and is the basis for the safeguarding induction.

In line with statutory requirements, every interview panel for Provision staff will have at least two members (teacher/manager) who has undertaken safer recruitment training.

Staff and volunteers recruited by Clover Learning Community have an enhanced DBS check, criminal checks and Barred List checks.

17: Other Relevant Policies

The Proprietor's statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports the following policies and documentation;

- Safer recruitment Policy
- Behaviour Policy
- Staff Code of Conduct
- Managing Allegations Policy
- Anti-Bullying Policy
- Attendance Policy
- Physical Interventions/Restraint (DfE Guidances "Use of Reasonable Force" and "Screening, searching and confiscation")
- Educational trips and visits Policy
- First aid Policy
- Health and Safety Policy
- Sex and Relationships Education Policy
- Risk assessments for site Security
- Equality and diversity Policy
- e-safety Policy
- Transport and driving Policy

The above list is not exhaustive but when undertaking development or planning of any kind the Provider will consider the

implications for safeguarding and promoting the welfare of children.

APPENDIX 1

PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD

Contents

A	General	
B	Individual Staff/Volunteers/Other Adults - main procedural steps	
C	Designated Safeguarding Lead – main procedural steps	

A. General

- 1) The Local Safeguarding Children Board Procedures contain the inter-agency processes, protocols and expectations for safeguarding children. (Available on [LSCB website](#)) The Designated Safeguarding Lead is expected to be aware of these, particularly the referral processes. **However the first step will be to contact the commissioner and the Provision will make a direct referral only when that contact has not been successful or in emergency.**
- 2) It is important that all parties act within 24-48 hours and avoid delays.
- 3) Any person may seek advice and guidance from the First Response Children's Duty Professionals Consultation Line on 0116 3050005, particularly if there is doubt about how to proceed. Any adult, whatever their role, can take action in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
- 4) A record, dated and signed, must be made to what has been alleged, noticed and reported, and kept securely and confidentially.
- 5) In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way and require assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral that might put the child at risk, and in individual cases advice from Children's Social Care will need to be taken.

B. FLOWCHART FOR PROCEDURE FOR REPORTING SAFEGUARDING CONCERNS

A - Safeguarding concern arises from information which indicates that a child has or may have been affected by:

B -

Explain to the child that you will **share this information** with a senior member of staff in order to **help** them

Listen carefully to and **take seriously** what the child is saying

Reassure the child who has made the disclosure to you and say that they have done the right thing and **assure them that you believe them**

Give the child **time to talk**, but **do not probe or ask leading questions**. Investigation is not your responsibility

Do not promise to keep secrets. All allegations of harm or potential harm **must be** acted upon.

Do not confront the person subject to the allegation

Record what has been said as soon as possible after the conversation and ensure that a **Designated Safeguarding Lead (DSL) is notified immediately via the methods described in C.**

C

Complete CPOMS record concern form

If you are noting bruising or marks, be sure to include the size, quantity and colour of the bruising or marks on the diagram on the CPOMS form.

Submit the CPOMS concern to the DSL / DDSL **immediately**

D

The DSL will proceed with the matter and should inform you of any appropriate next steps. If you do not hear from a DSL within 24 hours, please make contact with them.

Designated Safeguarding Lead (DSL) : Jadie Wardle
Deputy Designated Safeguarding Lead (DDSL) : Lisa Paine

Designated Safeguarding Lead – main procedural steps to be taken in discussion with the Commissioner.

(NB It may not be necessary for the Provision to follow all these steps if the Commissioner is taking action. Special note should be taken of clauses 4, 6 and 7 where the Provider may need to take urgent action)

- 1) Begin a case file which will hold a record of communications and actions to be stored securely (see Section on Records, Monitoring and Transfer).
- 2) Where initial enquiries do not justify a referral to the investigating agencies, inform the initiating adult and monitor the situation. If in doubt, seek advice from the First Response professionals consultation line.
- 3) Share information confidentially with those who need to know; the correct agencies must be informed if they are involved with a student.
- 4) Where there is a child protection concern requiring immediate, same day, intervention from Children's Social Care, the First Response Children's Duty should be contacted by phone. Written confirmation should be made within 24 hours on the LSCB Agency Referral Form to Children's Social Care. All other referrals should be made using the online form (see link <http://lrsb.org.uk/childreport>).

- 5) If the concern is about students using harmful sexual behaviour, refer to the separate guidance. "Guidance for schools working with children who display harmful sexual behaviour" (Leicestershire LA Guidance).
- 6) If it appears that urgent medical attention is required, arrange for the student to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the student has been taken to hospital.
- 7) Exceptional circumstances: If it is feared that the student might be at immediate risk on leaving the Provider's site, take advice from the First Response Professionals Consultation line (for instance about difficulties if the provision day has ended, or on whether to contact the police). Remain with the student until the Social Worker takes responsibility. If in these circumstances a parent arrives to collect the student, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (eg a restraining order). If there are clear signs of physical risk or threat, First Response Children's Duty should be updated and the Police should be contacted immediately.

APPENDIX 2

PROCESS FOR DEALING WITH ALLEGATIONS AGAINST STAFF (INCLUDING HEADTEACHERS) AND VOLUNTEERS

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with students has:

- behaved in a way that has harmed a student, or may have harmed a student;
- possibly committed a criminal offence against or related to a student; or
- behaved towards a student (s) in a way that indicates he or she would pose a risk of harm to children.

Relevant documents: ***DfE “Keeping children safe in education: Statutory guidance for schools and colleges” September 2025*** (part 4: Allegations of abuse made against teachers and other staff)

1) Individual Staff/Volunteers/Other Adults who receive the allegation:

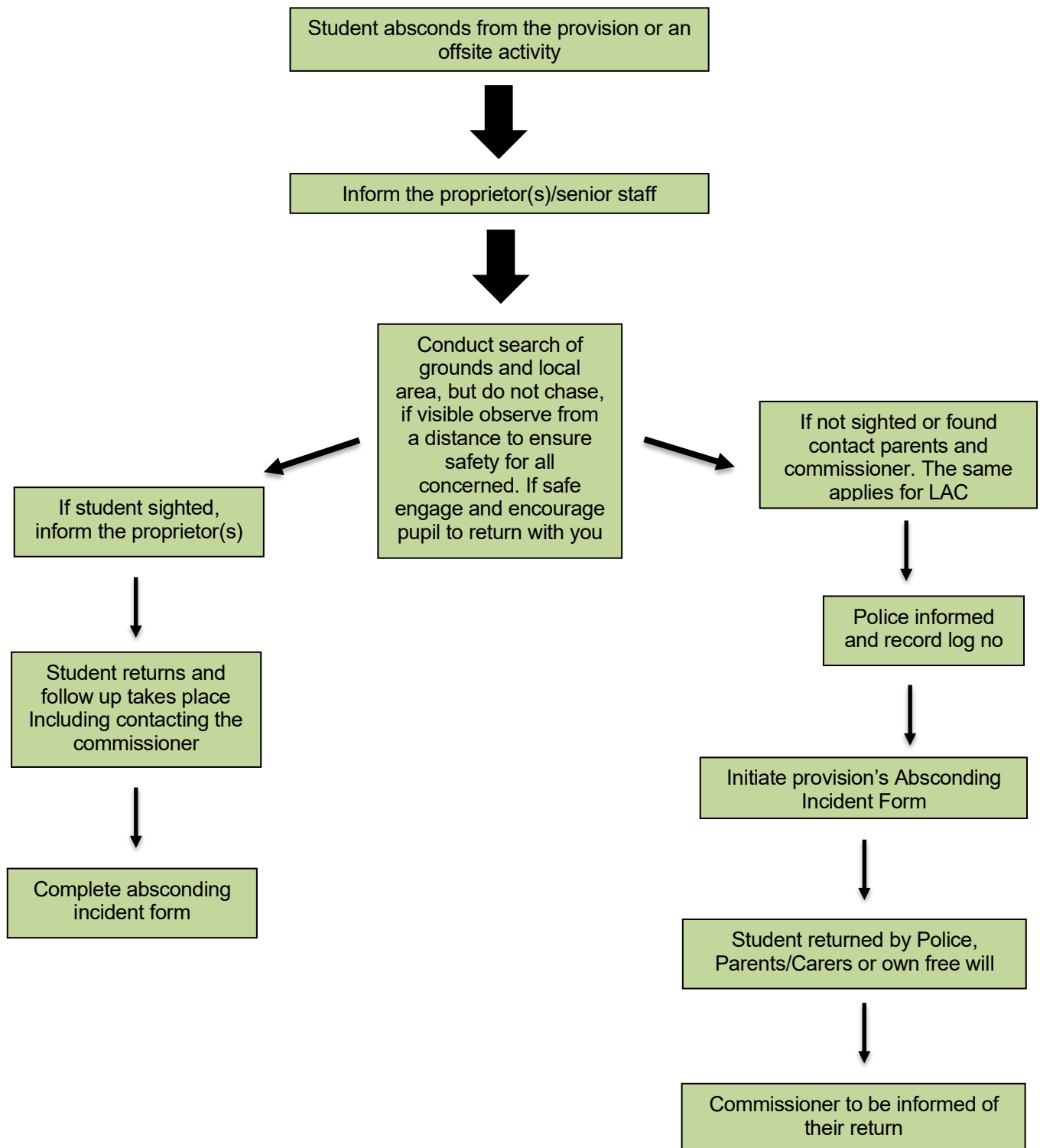
- i. Write a dated and timed note of what has been disclosed or noticed, said or done.
- ii. Report immediately to the Proprietor
- iii. Pass on the written record.
- iv. If the allegation concerns the conduct of the Proprietor, **report immediately to the Commissioner**. Pass on the written record. (If there is difficulty reporting to the Commissioner, contact the Allegations Manager (LADO), Safeguarding and Improvement Unit as soon as possible.)

2) Head of Centre / Proprietor

- i. If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- ii. **Before taking further action notify and seek advice from the Commissioner who will take advice from the Allegations Manager (LADO), Safeguarding and Improvement Unit on the same day.**
- iii. May be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- iv. Ensure the Commissioner has reported to First Response Children's Duty if the Allegations Manager (LADO) so advises or if circumstances require a referral concerning a child.
- v. Ongoing involvement in cases:
 - Liaison with the Allegations Manager (LADO)
 - Co-operation with the investigating agency's enquiries as appropriate.
 - Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.
 - Possible referral to the DBS or NCTL, depending on the outcome.

APPENDIX 4

ABSCONDING PROCEDURE



Appendix 5: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child 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 child 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 child or young person to encourage a response and build trust. The offender often grooms the child or young person 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 child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person 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 child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- 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 child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child 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 child or young person 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 child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

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

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 child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- 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 child or young person

Children who are absent from education

A child 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 child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, 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 child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. 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 children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. 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 children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

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

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

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

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

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

Child-on-child abuse

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

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- Abuse in intimate personal relationships between children (this is sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of 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 children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don’t want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school’s approach to this type of abuse.

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) 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 children 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. Children who witness domestic abuse are also victims.

Older children 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 children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation](#)

Encompass – commissioners will be informed of such incidents and it is expected they communicate this to the provision.

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

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to 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 staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil 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 or missing PE
 - Being repeatedly absent from school, 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 pupil 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 children 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' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into 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 child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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

The DSL will:

- Speak to the pupil 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 fmv@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and the [NSPCC](#) say that signs that a pupil 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 social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

Children who are victims of sexual violence and sexual harassment will likely find the experience 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 staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child 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 child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

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

Checking the identity and suitability of visitors

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

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

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

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

No maintenance companies will be given access to the building when students are on site.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow the absconding procedure.