SPENCER ALLIANCE for LEADERSHIP & TEACHING

Safeguarding Policy 2023 - 2024

Date of Adoption: 29.08.2023
Date of Policy Update: 07.03.2024
Date of Review: 29.08.2024

The Spencer Alliance of Leadership and Teaching wish to ensure that every person, from course participants to leaders and assessors, engaged with our programme and course delivery, is treated fairly and equitably at all times. This includes all arms of work:

Spencer Teaching School Hub, including all CPD courses, ECF and NPQ Training and AB Services
Spencer Apprenticeships
George Spencer Academy SCITT
The Derby Research School at Wyndham Primary Academy
Maths Hub East Midlands West

Definitions

The term 'learners' is used here to cover apprentices, SCITT trainees and participants on programmes and engaging with our AB Services as part of the Teaching School Hub. This reflects the broad scope of our engagement with young and adult learners

Safeguarding & Child Protection Policy and Guidance

September 2023
(revised March 2024)

This policy will be reviewed should statutory guidance require changes

This document comprises three parts.

- Part 1 – Spencer Alliance for Leadership and Training Safeguarding & Child Protection Policy
- Part 2 – Key Procedures
- Part 3 – Quality Assurance Commitment

This policy applies to all Academies and Training Providers within The Spencer Academies Trust (SAT) and to all employees, governors and volunteers working in each Training provision. SAT is committed to safeguarding learners, young people and learners and expects everyone working in our academies to share this commitment. This is underpinned by four key principles:

1. Everyone has a role to play in safeguarding learners. All Governors, employees, trainees, volunteers and contractors have a responsibility to help identify concerns, share information appropriately and take prompt action.
2. Adults in SAT take all welfare concerns seriously and encourage learners, young people and learners to talk to us about anything that worries them.
3. Employees maintain an attitude of "it could happen here" where safeguarding is concerned.
4. When concerned about a child's welfare, employees always act in the best interests of the child.

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This policy should be read alongside and in conjunction with other policies and documents regarding the safety and welfare of learners and learners at Spencer Academies Trust. These together make up the suite of policies and documents to safeguard and promote the welfare of learners, young people and learners (including vulnerable adults).

- ***Accessibility Plan***
- ***Anti-Bullying***
- ***Attendance* (including the safeguarding response to learners who go missing from education);**
- ***Behaviour***
- ***Health and Safety (including site security and first aid provision***
- ***Intimate Care***
- ***Online Safety***
- ***Relationships and Sex Education***
- ***Special Educational Needs and Disability (SEND)***
- ***Supporting learners with medical needs/Administration of Medicines Policy***

The training provision also operates within the following Trust level policies:

- ***Complaints Policy and Procedures***
- ***Disciplinary Policy (employees)***
- ***Employee Expectations and Code of Conduct***
- ***Equality & Diversity Policy***
- ***Freedom of Information***
- ***Information, Governance and Security policy (Part of the Trust data protection policy)***
- ***Grievance Policy (employees)***
- ***Visitor Protocol***
- ***Whistleblowing Policy***

Part One: Safeguarding Policy

1.0 Introduction

Safeguarding and promoting the welfare of learners is defined as

- protecting learners from maltreatment
- preventing impairment of learners' mental and physical health or development
- taking action to enable all learners to have the best outcomes

Learners includes all learners accessing our training provision, including those under the age of 18 and vulnerable adults.

This policy and the statutory guidance behind it are also applicable to government funded post 16 education, who are now required to have regard to KCSiE following the enactment of The Education and Training (Welfare of Learners) Act 2021.

Please refer also to KCSiE Part 1

- *Safeguarding information for all staff*
- *What school and college staff should know and do*
- *A child centred and coordinated approach to safeguarding*

This means that our training provision is committed to safeguarding and promoting the welfare of all its learners. We believe that:

- *Our learners/young people have the right to be protected from harm, abuse and neglect.*
- *Our learners/young people have the right to experience their optimum mental and physical health.*
- *Every child has the right to an education and learners/young people need to be safe and to feel safe in their training experiences and/or placements*
- *learners/young people need support that matches their individual needs, including those who may have experienced or witnessed abuse or with special education needs or other health conditions.*
- *Our learners/young people have the right to express their views, feelings and wishes and voice their own values and beliefs.*
- *Our learners/young people should be encouraged to respect each other's values and support each other.*
- *Our learners/young people have the right to be supported to meet their emotional, social and mental health needs as well as their educational needs. The SALT Provision will ensure clear systems and processes are in place to enable identification of these needs. Including consideration of when mental health needs may become a safeguarding need.*
- *SALT will contribute to the prevention of abuse, risk/involvement in serious violent crime, victimisation, bullying (including homophobic, biphobic, transphobic and cyber bullying), exploitation, sexually harmful behaviour, extreme behaviours, discriminatory views and risk-taking behaviours.*

All staff, governors, volunteers, contractors and visitors have an important role to play in safeguarding our learners and young people and protecting them from abuse and considering when mental health may become a safeguarding issue.

Safeguarding and Prevent for Adult Learners

The SALT Team is committed to the safeguarding of all our learners – from our SCITT trainees and apprentices through to our leadership programme participants on the NPQs.

If you have a concern about a fellow learner on any of our programmes, whether focusing on their wellbeing or something you would like to share, please don't hesitate to get in touch with a member of our dedicated team.

SALT Team Roles and Responsibility

Caroline Arnold
SALT Team Designated Safeguarding Lead
ITT Director and TSH Assistant Director
carnold@george-spencer.notts.sch.uk

Vicki Ilic
Mental Health and Wellbeing First Aider
SCITT Coordinator
vilic@george-spencer.notts.sch.uk

Tammy Elward
Prevent Lead and LGBTQ+ Trusted Link
SALT Director
tammyelward@satrust.com

Safeguarding is everyone's responsibility

SALT will fulfil its local and national responsibilities as laid out in the following documents: • **Working Together to Safeguard Learners (DfE) 2023** • **Keeping Learners Safe in Education 2022** • **The Education Act 2002** *S175* • **The Learners Act 1989/2004** • **General Data Protection Legislation (2018)** • **Local Safeguarding Partnership Child Protection and Safeguarding procedures** • **Mental Health & Behaviour in Schools** • **Multi-agency Statutory Guidance on Female Genital Mutilation 2020** • **Protecting Learners from Radicalisation: The Prevent Duty, 2015** • **Child Sexual Exploitation: Definition and Guide for Practitioners** • **Sexual Violence and Sexual Harassment Between Learners** • **Relationships Education, Relationships and Sex Education (RSE) and Health Education** • **Teaching Online Safety in Schools** • **Sharing nudes and semi-nudes: advice for education settings working with learners and young people** • **Voyeurism Offences Act 2019** • **DfE statutory guidance on Learners Missing Education** • **Allegations of Abuse Against Teachers and non-Teaching Staff**	*At the Spencer Alliance for Leadership and Teaching the following people will take the lead in these areas:* ***Our Designated Safeguarding Lead (DSL) is:*** ***Our Designated Teacher for Post-Looked After Learners is:*** ***Caroline Arnold, ITT and ECF Director*** *carnold@george-spencer.notts.sch.uk* ***Our lead for Mental Health is:*** ***Vicki Ilic, SCITT Coordinator*** *vilic@george-spencer.notts.sch.uk* ***Our Prevent Coordinator is:*** ***Our trusted link for LGBTQ+ learners is:*** ***Tammy Elward, Director of SALT*** *tammyelward@satrust.com* ***Our Local Authority Designated Officer (LADO) is:*** **Nottinghamshire** *Eva Callaghan* *Tel: 0115 8041272* *CDOP@nottscc.gov.uk* **Nottingham** ***Caroline Hose*** *caroline.hose@nottinghamcity.gov.uk* *Tel: 0115 876 4762* *safeguarding.partnerships@nottinghamcity.gov.uk* **Derbyshire** *LADO Team, Derbyshire* *Professional.Allegations@derbyshire.gov.uk* **Derby** *LADO Term, Derby* *cypsafeguarding@derby.gov.uk* *Tel: 01332 642376* ***Derby and Derbyshire Safeguarding Children Partnership***: WEBSITE *Our relevant safeguarding partnership website is:* **Nottinghamshire** https://nscp.nottinghamshire.gov.uk/ **Nottingham** http://www.nottinghamcity.gov.uk/learners-and-families/safeguarding-learners-board/ **Derbyshire** https://www.derbyshirescb.org.uk/ **Derby** http://www.derbyscb.org.uk/

2.0 Overall Aims	*This means that SALT will:*
This policy will contribute to the protection and safeguarding of our learners and promote their welfare by: • Adopting a whole organisation approach to safeguarding; • Ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development in our training provision; • Clarifying standards of behaviour for staff and learners; • Contributing to the establishment of a safe, resilient and robust ethos in the training provision, built on mutual respect and shared values; • Introducing appropriate work within the curriculum; • Encouraging learners (and parents where appropriate) to participate; • Alerting staff to the signs and indicators that all may not be well; • Developing staff awareness of the causes of abuse; • Developing staff awareness of the risks and vulnerabilities our learners face; • Addressing concerns at the earliest possible stage; • Reducing the potential risks learners face of being exposed to multiple harms including violence, extremism, exploitation, discrimination or victimisation; • Recognising risk and supporting online safety for learners, including in the home.	• *Identify and protect all learners especially those identified as vulnerable.* • *Identify individual needs as early as possible; gain the voice and lived experience of vulnerable learners and design plans to address those needs.* • *Work in partnership with learners, parents/carers and other agencies.* *Our policy extends to any establishment our training provision commissions to deliver education to our learners on our behalf.* *Our Trust Board of Directors and the governing bodies which relate to arms of the SALT provision will ensure that any commissioned agency will reflect the values, philosophy and standards of our training provision. Confirmation will be sought by us that appropriate risk assessments are completed and ongoing monitoring is undertaken.*

3.0 Guiding Principles Spencer Academies Trust work on the five guiding principles of safeguarding, these ensure we: • Have conversations and listen to learners (and their families where appropriate) as early as possible. • Understand the learner's lived experience. • Work collaboratively to improve learners' life experience. • Are open, honest and transparent with learners (and their families where appropriate) in our approach. • Empower learners (and their families where appropriate) by working with them to build resilience to overcome difficulties.	*This means that at SALT all staff will be aware of this policy, any additional training that we provide and be aware of our local guidance issued by our Local Authorities.* *All staff will be enabled to listen and understand the lived experience of learners and young people by facilitating solution focused conversations appropriate to the learner's/young person`s preferred communication style.* *It also means that where early help is appropriate, the DSL/DDSL will liaise with other agencies and complete an inter-agency assessment as appropriate. If required to, all staff will support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.* *Early help cases will be kept under constant review, and if the learner's situation does not improve/ is getting worse, consideration will be given to a referral to learners's social care for assessment for statutory services.*

4.0 Expectations All staff, central team members, governors, volunteers, contractors and visitors will: • Be familiar with this Safeguarding & Child Protection Policy. • Understand their role in relation to safeguarding. • Be alert to signs and indicators of possible abuse (See Appendix 1 for current definitions and indicators). • Record concerns and give the record directly to the DSL. • Deal with disclosures of abuse from learners in line with the guidance in Part 2 point 19, informing the DSL immediately and providing a written account as soon as possible, ideally using our online reporting system 'MyConcern' or by email where this is not possible. • Be involved, where appropriate, in the implementation of individual training provision-focused interventions and Early Help Assessments.	*This means that at SALT:* *All staff receive annual safeguarding training and update briefings as appropriate.* *Key staff undertake more specialist safeguarding training as agreed by the governing body.* *In recognition of the impact of COVID-19, additional disclosure training is undertaken by all staff.* *We follow Safer Recruitment processes and relevant statutory checks for all staff, including 'Section 128' check.*

5.0 The Designated Safeguarding Lead (DSL)	*The DSL in our training provision is:* ***Caroline Arnold, ITT and ECF Director*** *carnold@george-spencer.notts.sch.uk*

• The DSL is a member of the Senior Leadership Team.
• Our DSL helps promote educational outcomes by working closely with facilitators/programme leads about learners' welfare and safeguarding concerns.
• The Trust ensure that the DSL role is explicit in the post-holder's job description and appropriate time is made available to the DSL to allow them to undertake their duties. Their key duties can be summarised as:
  o Managing referrals from school staff and any others from outside the training provision.
  o Working with others (including external agencies and professionals) on matters of safeguarding.
  o Undertake training to keep knowledge of local and national contexts up to date.
  o Raise awareness of safeguarding and child protection amongst staff, parents and learners.
• Safeguarding and child protection information will be dealt with in a confidential manner.
• The DSL will ensure that the training provision is clear on parental responsibility for learners on roll, and report all identified private fostering arrangements to the local authority.
• Safeguarding records will be stored securely in a central place separate from academic records. Individual files will be kept for each student: the training provision will not keep family files. Files will be kept for at least the period during which the student is attending the training provision, and beyond that in line with current data legislation and guidance.
• Where appropriate, If a leaner (under 18) moves from our training provision, safeguarding records will be forwarded on to the DSL at the new education setting, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two providers may be necessary.
• The DSL will oversee the safer recruitment practices within the provision as well as event and site safety.
• The Designated Safeguarding Lead is aware of the requirement for learners to have an appropriate adult when in contact with Police officers who suspect them of an offence. Further information about this can be found in Appendix 8.
• The DSL takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place at the academy
	Any steps taken to support a young person/vulnerable adult who has a safeguarding vulnerability must be reported to the lead DSL.
	
	Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to support an individual child and/or family. A written record will be made of what information has been shared, with whom, and when. This is recorded on My Concern.
	
	During term time the DSL will always be available (during the school day). If no DSL is available staff should speak to the SALT Director or another member of SLT who will contact the Director of Inclusion, Sarah McAneny for further advice or guidance as appropriate.
	
	During out of training provision hours, colleagues can report using MyConcern or our DSL's contact details above.
	
	Because we use MyConcern and store our records electronically we do not hold paper files.
	
	Where relevant, we will not disclose to a parent any information held on a young person if this would put the child at risk of significant harm.
	
	We will record where and to whom the records have been passed and the date.
	
	This will allow the new setting to continue supporting victims of abuse and have that support in place for when the young person arrives with them.

A full outline of their role and responsibilities can be found in appendix 10.	

6.0 Contextual Safeguarding Contextual safeguarding is about the impact of the public/social context on young people's and learners' lives, and consequently their safety. It seeks to identify and respond to harm and abuse posed to young people outside their home, either from adults or other young people. As an approach it looks at how interventions can change the processes and environments, to make them safer for all young people, as opposed to focussing on an individual.	*DSLs will consider contextual safeguarding and give due regard to the effectiveness of the training provision safeguarding system within the wider system. This will be evidenced in:* • *Informal and formal assessments of need/ risk for a learner* • *Case discussions in DSL supervision sessions* • *Attendance at SAT DSL Network meetings* • *Completion of the SAT Safeguarding Audit*

7.0 Mental Health KCSiE 2022 requires all staff to be aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation. We recognise that where learners have suffered abuse and neglect, or other potentially traumatic adverse experiences, this can have a lasting impact into adulthood. We understand our responsibility to be aware of how learners' experiences may impact on their mental health, behaviour and education. **Mental Health Support** Training provision staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Training provision staff are well placed to observe learners day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Additional information and guidance is available in: **Department for Education (DfE) (2017) Preventing bullying.** https://www.gov.uk/government/publications/preventing-and-tackling-bullying **Department for Education (DfE) (2018) Mental health and behaviour in Schools** https://www.gov.uk/government/publications/mental-health-and-behaviour-in-training provisions--2 Our Training provision has identified a senior mental health lead. They are supported by the senior leadership team to help identify and co-ordinate provision for mental health.	*At SALT, this means that:* • *mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.* • *All staff will take immediate action and speak to a DSL if they have a mental health concern about a child that is also a safeguarding concern.* • *We take seriously our organisational and professional role in supporting and promoting mental health and wellbeing of learners/young people through:* • ***Prevention**: creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole training provision population, and equipping learners to be resilient so that they can manage the normal stress of life effectively. This will include teaching learners about mental wellbeing through the curriculum and reinforcing this teaching through the training provision activities and ethos;* • ***Identification:** recognising emerging issues as early and accurately as possible;* • ***Early support:** helping learners to access evidence based early support and interventions; and* • ***Access to specialist support**: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.*
8.0 The Designated Teacher for Previously Looked After Learners	*In our training provision the Designated Teacher is:* ***Caroline Arnold, ITT and ECF Director***

• Designated teachers will have responsibility for promoting the educational achievement of learners/ young people who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. **Promoting the educational outcomes of learners with a social worker** • Learners with a social worker may face barriers to education because of complex circumstances • Effective support for learners with a social worker needs education settings and local authorities to work together. All agencies can play a crucial role in establishing a culture where every learner is able to make progress.	*carnold@george-spencer.notts.sch.uk* *At SALT we will work with our Trust Director of Inclusion and partners to effectively identify the needs of learners and ensure they can access interventions that make a difference to their education.* *The Designated Teacher will liaise, as necessary, with relevant agencies regarding any issues of concern affecting the care leaver.*
9.0 The Board of Directors and Governing Body/Strategic Board The Trust's Board of Directors and the training provision's governing bodies/strategic boards ensure that there are policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote learners' welfare. They ensure that these are fully embedded within the ethos of each training provision: • All strategic board members will receive appropriate safeguarding training in order to provide strategic challenge to assure themselves that safeguarding policies and procedures are effective and to support the delivery of a robust approach across the organisation, including regularly reviewing filtering and monitoring systems. This training will be updated annually. • The training provision operates 'Safer Recruitment' procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers. • The SALT Director and all other staff who work with learners undertake safeguarding training on an annual basis with additional updates as necessary within a two-year framework and a training record is maintained, including all staff having an understanding of the expectations, applicable roles and responsibilities in relation to ICT filtering and monitoring. • All employees undertake mandatory induction training which includes: The Safeguarding & Child Protection Policy; the Behaviour Policy; the Staff Code of Conduct; the response to CME; the role of the DSL. • Temporary staff and volunteers are made aware of the training provision's arrangements for safeguarding and their responsibilities.	*At SALT this means that:* *All governors/board members must read part 2 of 'KCSiE 2022'* *The governing body/strategic board will review all policies/procedures that relate to safeguarding and child protection annually.* *The chair of each governing body/strategic board is nominated to be responsible for liaising with the Chief Executive Officer (CEO) of the Trust where an allegation of abuse is being made against the SAKT Director. The CEO will liaise directly with the LADO.*

• The training provision remedies any deficiencies or weaknesses brought to its attention without delay. • The training provision has a written policy and procedures for dealing with allegations of abuse against members of staff, visitors, volunteers or governors/strategic board members. • Where appropriate, a strategic board may have a nominated lead for safeguarding who is responsible for liaising with the SALT Director, that strand lead and DSL over all matters regarding safeguarding and child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual learners.	
10.0 Safer Recruitment and Selection The training provision follows part 3 of 'Keeping Learners Safe in Education 2022' (KCSiE) and pays full regard to 'Safer Recruitment' requirements for employees including but not limited to: • verifying candidates' identity and academic or vocational qualifications • obtaining professional and character references • checking previous employment history and ensuring that a candidate has the health and physical capacity for the job, • UK Right to Work • clear, enhanced DBS check • any further checks as appropriate to gain all the relevant information to enable checks on suitability to work with learners. • Informing candidates of the need to carry out online searches as part of due diligence. Evidence of these checks is recorded on the Single Central Record. All recruitment materials will include reference to SAT's commitment to safeguarding and promote the welfare and wellbeing of learners. **Safer Recruitment Compliance also relates to the SCITT and Apprenticeship team's work where they** • apply appropriate pre-selection checks • consider Disclosure and Barring Service (DBS) criminal records checks and children's barred list information. • confirm in writing to schools that a non-salaried trainee's criminal record check, including a check of the children's barred list, has been completed and that the individual has been judged by the provider to be suitable to work with children. • check that a trainee has not previously been removed from a programme because they have behaved in a way that indicates they may not be suitable to work with children, or if the previous provider would have removed the trainee had they not left.	*This means that at SALT:* *The following key training provision staff have undertaken Safer Recruitment training:* 1. ***Tammy Elward, Director*** 2. ***Caroline Arnold, ITT and ECF Director*** 3. ***Sarah Kelly, Apprenticeships Operations Manager*** 4. ***Amy Ford, Deputy Director of the Derby Research School*** 5. ***Lucy Lycett, Maths Hub EMW Lead*** *However, a range of other staff have also completed the training and their certificates are held as part of the safeguarding training file.* The DSL within the SALT Team is expected to ensure safer recruitment within the **SCITT and Apprenticeship team**.

• may recommend to applicants that are checked early in the recruitment cycle that they register with the DBS update service.	

10.1 Induction All staff are aware of systems within their setting which support safeguarding, and these are explained to them as part of the staff induction process. **10.2 Staff support** • Regular safeguarding supervision will be offered to the Lead DSL within the training provision. • Usually offered half termly, safeguarding supervision may need to be offered more frequently and extended to other members of staff as deemed appropriate by the academy. • DSLs will be supported to access training as appropriate including training in behaviour and mental health. • All DSLs will attend the SAT DSL Network meeting as part of their ongoing CPD and to share relevant local and national guidance and safeguarding contexts. These will be held at least termly.	*Our staff induction process covers:* • *The Safeguarding & Child Protection policy* • *The Behaviour Policy* • *The SAT Code of Conduct* • *The safeguarding response to children who go missing from education* • *The role of the DSL (including the identity of the DSL and any deputies)* *Copies of policies and a copy of part one of KSCIE is provided* to *staff at induction*. *We recognise the importance of practice oversight and multiple perspectives in safeguarding and child protection work. We will support staff by providing opportunities for reflective practice including opportunity to talk through all aspects of safeguarding work within education with the DSL and to seek further support as appropriate.*

11.0 The use of reasonable force There are circumstances when it is appropriate for staff in training provision to use reasonable force to safeguard learners and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain a student. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury to themselves or another person. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between learners or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. Government advice for 'Use of Reasonable Force in Schools' is available **here**.	*This means at SALT:* *By planning positive and proactive behaviour support, the occurrence of challenging behaviour and the need to use reasonable force will reduce or not be necessary.* *We will write individual behaviour plans for our more vulnerable learners and agree them with parents and carers.* *We will not have a 'no contact' policy as this could leave our staff unable to fully support and protect their staff and learners.* *When using reasonable force in response to risks presented by incidents involving learners including any with SEN or disabilities, or with medical conditions, our staff will consider the risks carefully.*

12.0 The training provision's role in the prevention of abuse This Safeguarding & Child Protection Policy cannot be separated from the general culture and ethos of the training provision, which should ensure that learners: • are treated with respect and dignity; • are taught to treat each other with respect; • feel safe; • have a voice and are listened to. Safeguarding issues will be addressed through the curriculum in an age appropriate way and will include opportunities to learn about: • 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 • what constitutes sexual harassment and sexual violence and why these are always unacceptable. • 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 Female Genital Mutilation (FGM), and how to access support. • Prevent and radicalisation (educateagainsthate.com)	*This means SALT:* *All staff will be made aware of our training provision's unauthorised absence procedures.* *We will provide opportunities for learners to develop skills, concepts, attitudes and knowledge that promote their safety and well-being through our Personal Development Framework which is applied into each strands' work in a manner appropriate for each parts of the provision.* *Our personal development provision is fully inclusive and developed to be age and stage of development appropriate, with particular consideration given to learners with SEND and other vulnerabilities.* *All our policies, which address issues of power and potential harm, will be inter-linked to ensure a whole training provision approach.* *We recognise the particular vulnerability of learners who have a social worker.*

13.0 What we will do when we are concerned – Early Help response Where unmet needs have been identified for a student but there is no evidence of a significant risk, the DSL will oversee the delivery of an appropriate Early Help response. The student's voice must remain paramount within a solution focused practice framework. The primary assessment document is the Early Help Assessment Form (EHAF). If early help is appropriate, the DSL (or deputy) will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL will then oversee the agreed intervention from the training provision as part of the multi-agency safeguarding response and ongoing training provision-focused support. **Any** learner may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who: • is disabled and has specific additional needs; • has Special Educational Needs (whether or not they have a statutory Education, Health and Care Plan); • is a carer; • is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups; • is frequently missing/goes missing from care or from home; • is misusing drugs or alcohol themselves; • is at risk of modern slavery, trafficking or exploitation; • is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; • has returned home to their family from care; • is showing early signs of abuse and/or neglect; • is at risk of being radicalised or exploited; • is a privately fostered child.	*This means that in our training provision:* *All staff will notice and listen to learners and young people, sharing their concerns with the DSL in writing.* *Safeguarding leads will assess, plan, do and review plans.* *Senior leaders will analyse safeguarding data and practice to inform strategic planning and staff CDP.* *The DSL will generally lead on liaising with other agencies. The multi-agency plan will then be reviewed regularly, and progress updated towards the goals until the unmet safeguarding needs have been addressed.* *In our training provision although any member of staff can refer a situation to the Early Help team, it is expected that the majority are passed through the DSL team.*

14.0 Safeguarding learners who are susceptible to radicalisation From 1st July 2015, all academies are subject to the Prevent Duty and must have 'due regard to the need to prevent people being drawn into terrorism' (section 26, Counter Terrorism and Security Act 2015) The current threat from terrorism in the United Kingdom may include the exploitation of people who are susceptible to being drawn into terrorism through direct involvement or in activity in support of terrorism. The normalisation of extreme views may also make learners and young people susceptible to future manipulation and exploitation. Definitions of radicalisation, terrorism and extremism, and indicators of vulnerability or being susceptible to radicalisation are in Appendix 2.	*This means that in our training provision:* *We value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values.* *Learners and facilitators have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.* *Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.*

14.1 Risk Reduction

The SALT Director and the DSL will assess the level of risk within the training provision and put actions in place to reduce that risk. Risk assessment may include consideration of the training provision's personal development framework, the use of training provision premises by external facilitators, integration of learners by gender and SEND, anti-bullying policy and other issues specific to the training provision's profile, community and philosophy. To this end, open source due diligence checks will be undertaken on all external speakers invited to our training provision.

The setting is required to identify a **Prevent Single Point of Contact (SPOC)** who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL. The responsibilities of the SPOC are described in Appendix 2.

The training provision will work with our IT provider to monitor online activity within the training provision to ensure that inappropriate sites are not accessed by learners or staff.

The training provision has a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

14.2 Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Counter Terrorism Policing East Midlands (CTP EM), and it aims to:

- Establish an effective multi-agency referral and intervention process to identify susceptible individuals;
- Safeguard individuals who might be susceptible to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce susceptibility.

Further guidance about duties relating to the risk of radicalisation is available in the Advice for Schools on **The Prevent Duty**.

We are clear that exploitation and radicalisation must be viewed as a safeguarding concern and that protecting learners from the risk of radicalisation from any group (including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements) is part of our training provision's safeguarding duty.

The Prevent Lead (SPOC) for our training provision is:
Tammy Elward, Director of SALT
tammyelward@satrust.com

All staff within our training provision will be alert to changes in a learner's behaviour or attitude which could indicate that they are in need of help or protection.

We will use specialist online monitoring software, which in this training provision is called NetSupport, which is updated at least annually.

Our training provision will make referrals to Channel if we are concerned that an individual might be vulnerable to radicalisation.

Our training provision has a Prevent Risk Assessment and Action Plan that is reviewed at least annually is updated appropriately.

15.0 Learners who are vulnerable to exploitation, trafficking, or so-called 'honour-based' abuse (including female genital mutilation and forced marriage) With effect from October 2015, all schools are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM). When a staff member suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged 18 or under, that staff member has a statutory duty to report it to the Police. Failure to report such cases will result in disciplinary action. The staff member will also discuss the situation with the DSL who will consult the local authority's learners's services before a decision is made as to whether the mandatory reporting duty applies. Further information about FGM and indicators can be found in Appendix 4. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.	*This means that at SALT we ensure:* *Our staff are supported to talk to families and local communities about sensitive concerns in relation to their learners and to find ways to address them together wherever possible.* *All staff are up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation around;* • *Forced marriage* • *FGM* • *Honour based abuse* • *Trafficking* • *Criminal exploitation and gang affiliation* *Our staff will be supported to recognise warning signs and symptoms in relation to each specific issue, and include such issues, in an age appropriate way, in their lesson plans.*

16.0 Learners who are absent from education A young learner going missing and/or patterns of repeated or prolonged authorised, or unauthorised absence, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future. Work around attendance and learners who are absent from education will be coordinated with safeguarding interventions. The training provision must notify the local authority of any student who has been absent without the training provision's permission for a continuous period of 5 days or more after making reasonable enquiries. The training provision must also notify the local authority of any student who is to be deleted from the admission register under any of the prescribed regulations outlined in the Education (Pupil Registration) (England) Regulations 2016 amendments.	*This means that at SALT we will:* *Hold two or more emergency contact numbers/details for each learner wherever possible.* *Ensure all our attendance work liaises closely with the DSL.* *Adapt our attendance monitoring on an individual basis to ensure the safety of each student at our training provision* *Demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of a learner that would be considered 'missing'.* *Work closely with local authority partners who support with school attendance and CME/prolonged or repeated absence, making referrals to the relevant service if a young learner is unaccounted for.*

17.0 Peer on Peer abuse (child on child abuse)

The KCSiE 2023 guidance requires that additional information about peer on peer abuse (or child on child abuse for our younger learners) should be included in the training provision's safeguarding policies. All SAT academies and training providers have a zero-tolerance approach to sexual violence and sexual harassment. It is never passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys".

All SAT academies and training providers recognise that learners are capable of abusing other learners, and that this abuse can include bullying, physical abuse, sharing nudes and semi-nudes, initiation/hazing, upskirting, sexual violence and harassment.

The training provision's values, ethos and behaviour policies provide the platform for staff and learners to clearly recognise that abuse is abuse and it should never be tolerated or diminished in significance. It should be recognised that there is a gendered nature to peer on peer abuse i.e. that it is more likely that girls will be victims and boys' perpetrators.

We recognise the impact of sexual violence and the fact young people can, and sometimes do, abuse other young people in this way. When referring to sexual violence this policy is referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape**: A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.

- **Assault by penetration**: A person (A) commits an offence if: they intentionally penetrates the vagina, anus or mouth of another person (B) with a part of their body or anything else, the penetration is sexual, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.

- **Sexual assault**: A person (A) commits an offence of sexual assault if: they intentionally touches another person (B), the touching is sexual, (B) does not consent to the touching and (A) does not reasonably believe that (B) consents.

- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

This means that at SALT:

All staff receive training on peer on peer abuse.

We adopt the 'whole organisation approach' to tackling sexism.

We fully understand that even if there are no reports of peer on peer abuse at the training provision, it may be happening. As such all our staff and learners are supported to:

- *be alert to peer on peer abuse (including sexual harassment);*
- *understand how the training provision views and responds to peer on peer abuse*
- *stay safe and be confident that reports of such abuse will be taken seriously.*
- *Understand intra-familial harms and that support may be needed for siblings.*

We do not tolerate instances of peer on peer abuse and will not pass it off as "banter", or "part of growing up".

We recognise that peer on peer abuse can occur between and across different age ranges.

We follow both national and local guidance and policies to support any student subject to peer on peer abuse.

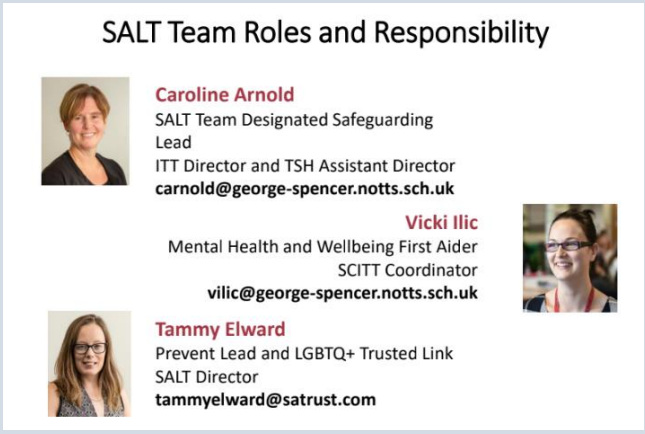
In assessing and responding to harmful sexualised behaviour, we will follow the local good practice guidance to enable provision of effective support to any student affected by this type of abuse.

Where the victim asks the training provision not to tell anyone about the sexual violence or sexual harassment, we recognise there are no easy or definitive answers to this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL will balance the victim's wishes against their duty to protect the victim and other learners.

18.0 Criminal Exploitation Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young learner into sexual or criminal activity. The Training provision recognises that the child sexual exploitation can cause a great deal of harm to a young learner, including physically, emotionally, educationally and socially. Where it exists, it can also cause harm to communities including our Training provision Further indicators of CCE can be found in Appendix 3.	*This means that in our training provision we will:* *Notice and listen to learners showing signs of being drawn in to anti-social or criminal behaviour,* *use the risk assessment screening tool to support our referrals to learners' services for any learners in our training provision we are concerned about.* *Be aware of and work with the Police and local organisations to disrupt as much as possible criminal exploitation activity within our training provision.* *Recognise that prevention is the best position with regard to CSE/CCE. We will support learners to develop confidence and build resilience. We will endeavour to support their age and needs appropriate knowledge and raise awareness and understanding of what CSE/CCE is, to understand the risks of CSE/CCE and to spot the warning signs for themselves and also their friends and peers and by doing so keep safe.*

Part Two: Key procedures

Responding to Concerns about a Learner



CONCERN ABOUT A LEARNER:

Speak to Designated Safeguarding Lead (DSL) if urgent.
If not urgent, record on MyConcern and speak to a DSL before the end of the day.

↓

DSL(s) review concerns and decide next steps

- Consider discussing concerns with parent / carers and seek consent where appropriate.
- Consider completing Early Help Assessment (EHA).

↓

At any point, consider seeking advice:

Trust Director of Inclusion – Sarah McAneny-Vincent
sarahmcaneny@satrust.com

In case of emergency phone police on 999

↓

Universal / Universal+
Continue with early help process using the EHA as appropriate

←

Universal+/Additional
Continue with early help process using the EHA as appropriate. Consider request for support from external agencies.

→

Complex & Significant
Request for Support submitted to MASH for a multi-agency strategy discussion

19.0 Dealing with a disclosure of abuse against a learner

19.1 When a learner tells me about abuse they have suffered, staff should remember:

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the learner. Tell them you are pleased that they are speaking to you.
- Never enter into a pact of secrecy with the learner. Assure them that you will try to help but let the learner know that you will have to tell other people in order to do this. State who this will be and why.
- Tell them that you believe them. Learners very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- Tell the learner that it is not their fault.
- Encourage the learner to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the learner is trying to tell you.
- Praise the learner for telling you. Communicate that they have a right to be safe and protected.
- Do not tell the learner that what they experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the learner may retract what they have told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the learner again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the learner's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- If the disclosure relates to a physical injury do not photograph the injury but record in writing as much detail as possible.

19.2 NB - it is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk. Employees should never attempt to carry out an investigation of suspected abuse by interviewing the learner or any others involved. The only people who should investigate abuse and harm are Social Care, Police or the NSPCC.

19.3 Staff should be aware that not all learners will feel ready to talk about their abuse. However, they should be mindful of the importance of professional curiosity, supportive relationships and speaking to the DSL whenever they have a concern, even when a learner hasn't made a direct disclosure.

19.3 Immediately after a disclosure

19.3.1 You should not deal with this yourself. Clear indications or disclosure of abuse for a young adult must be reported to local authority children's services without delay, by the DSL/DDSL or in exceptional circumstances by the staff member who has raised the concern.

19.3.2 Learners making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a learner who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL.

19.4 Records and Monitoring

19.4.1 A written record of any concerns about a learner will be **made within 24 hours**. All SAT training provision's use for recording and monitoring child protection and other safeguarding issues. Records will comprise a mixture of directly recorded information, uploads of electronic documents and scans of other evidence where appropriate.

19.4.2 All records will provide a factual and evidence-based account with accurate recording of any actions. Records will identify the person making the record, be dated and, where

appropriate, be witnessed. Where an opinion or professional judgement is recorded this should be clearly stated as such.

19.5 At no time should an individual teacher/employee or training provision be asked to or consider taking photographic evidence of any injuries or marks to a learner's person. This type of behaviour could lead to the employee being taken into managing allegations procedures. The body map approach should be used.

19.6 Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MASH or the learner's social worker if already an open case to social care.

19.7 The Training provision will keep records of concerns about learners even where there is no need to refer the matter to MASH/Child's Services (or similar) immediately. Records will be kept up to date and reviewed regularly by the DSL to evidence and support actions taken by employees in discharging their safeguarding arrangements. Original notes will be retained (but clearly identified as such) as this is a contemporaneous account; they may be important in any criminal proceedings arising from current or historical allegations of abuse or neglect.

19.7 Where learners leave the training provision, employees should ensure their concern/child protection file is transferred to the new setting as soon as possible (this should be as soon as possible and no later than 15 working days). This should be transferred separately from the main learner file, ensuring secure transit and confirmation of receipt should be obtained.

20.0 Involving parents/carers

20.1 In general, we will discuss any safeguarding or child protection concerns regarding young leaners with parents/carers before approaching other schools or agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL.

However, there may be occasions when the training provision will contact another school or agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the young learner.

20.2 Parents/carers will be informed about our Safeguarding & Child Protection Policy as part of the onboarding process for our young learners and reinforced through regular communications, such as the newsletter.

21.0 Multi-agency work & Information Sharing

21.1 We work in partnership with other agencies to promote the best interests of our learners and keep them as a top priority in all decisions and actions that affect them. Our training provision will, where necessary, liaise with these agencies to implement or contribute to an Early Help Assessment and make requests for support from the local authority child's services. These requests will be made by the DSL to the MASH. Where the student already has a safeguarding social worker or family support worker, concerns around escalation of risks must be reported immediately to the social/ family support worker, or in their absence, to their team manager.

21.2 When invited, the DSL will participate in a MASH strategy meeting, usually by conference phone, adding training provision-held data and intelligence to the discussion so that the best interests of the student are met.

21.3 We will co-operate with any child protection enquiries conducted child's services: the training provision will ensure representation at appropriate inter-agency meetings such as Learners in Need, Initial and Review Child Protection Conferences, and Core Group meetings.

21.4 We will provide reports as required for these meetings. If the training provision is unable to attend, a written report will be sent and shared with the relevant agency at least 24 hours prior to the meeting.

21.5 Where a student is subject to an inter-agency Child Protection Plan or a multi-agency risk assessment conference (MARAC) meeting, the training provision will contribute to the preparation, implementation and review of the plan as appropriate.

21.6 We recognise that information sharing is vital in identifying and tackling all forms of abuse. Whilst, among other obligations, the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is **not** a barrier to sharing information. The Data Protection Act 2018 and GDPR **do not prevent the sharing of information for the purposes of keeping learners safe**. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner (including where it has not been possible to gain consent). Further guidance can be found **here.**

22.0 Our role in supporting learners

22.1 Our training provision staff will offer appropriate support to individual learners who have experienced abuse, witnessed abuse, who have abused others (peer on peer abuse) or who act as young carers in their home situation.

22.2 Where necessary a Team Around the Learner or Early Help Plan will be devised, implemented and reviewed regularly for these learners. This plan will detail areas of support, who will be involved, and the learner's wishes and feelings. A copy of the plan will be kept on the learner's safeguarding record.

22.3 Learners and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the training provision community through a multi-agency risk assessment. Within our training provision we will ensure that the needs of learners and young people who abuse others will be considered separately from the needs of their victims.

22.4 We will ensure the training provision works in partnership with parents/carers and other agencies as appropriate.

23.0 Responding to an allegation about a member of staff

23.1 This procedure must be used in any case in which it is alleged that a member of staff, governor, contractor, visiting professional or volunteer has:

- Behaved in a way that has harmed a child/young person or may have harmed a child/young person;
- Possibly committed a criminal offence against or related to a child/young person; or
- Behaved in a way that indicates they may not be suitable to work with learners/young people.
- Behaved towards a child or learners in a way that indicated they may pose a risk of harm to learners.
- This applies to anyone working in the training provision who has behaved, or may have behaved, **in a way that indicates they may not be suitable to work with learners**.

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**
  For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.

- **Emotional**
  For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for learners's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual**
  For example, sexualised behaviour towards learners, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault and rape.
- **Neglect**
  For example, failing to act to protect learners/young people, failing to seek medical attention or failure to carry out an appropriate risk assessment.
- **Spiritual Abuse**
  For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

23.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in our training provision to abuse learners. In our training provision we also recognise that concerns may be apparent before an allegation is made.

23.3 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards learners and young people **immediately**.

23.3.1. If a child makes an allegation about a member of staff, governor, visitor or volunteer the SALT Director must be informed immediately. The SALT Director must carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The SALT Director will appoint an appropriate manager to conduct the investigation and will ensure that all investigations including for supply staff are completed appropriately. The SALT Director will liaise with the Local Authority Designated Officer (LADO) Team who will decide on any action required. The SALT Director must also liaise with the Trust HR team. The SALT Director should exercise and be accountable for their professional judgement on the action to be taken as follows:

- If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the SALT Director will notify the Local Authority Designated Officer (LADO) Team. The LADO Team will liaise with the SALT Director and advise about action to be taken and may initiate internal referrals within the local authority to address the needs of learners likely to have been affected.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the student, these should be addressed through the training provision's own internal procedures.
- If the SALT Director decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child's safeguarding file. <u>The allegation should be removed from personnel records.</u>

23.3.2 If the concern relates to the SALT Director or a member of the Trust central team, it must be reported immediately to the Chief Executive Officer (CEO) Paul West, who will liaise with the LADO and they will decide on any action required. The CEO will also liaise with the Chair of the Local Governing Body.

23.3.3 If the safeguarding concern relates to CEO or a Trust Board Member then the concern must be made to the Chair of the Trust Board of Directors, Donna Kinderman, who will liaise directly with the LADO Team who will decide on any action required.

23.4 Before contacting the LADO, the training provision should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Following this, allegations should be reported to the LADO without delay.

23.5 Under guidance on 'transferable risk,' a risk assessment will be carried out where there is reason to believe that an individual has behaved or may have behaved in a way that indicates they may not be suitable to work with learners. This might include an incident outside the training provision which did not involve learners but could have an impact on an individual's suitability to work with learners.

23.6 The SALT Director has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see paragraph 24 below).

24.0 Low level allegations or concerns about a member of staff

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

24.1 Example behaviours include, but are not limited to:

- being over friendly with learners;
- having favourites;
- taking photographs of learners on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

24.2 All staff working within our organisation must report any potential low-level concerns about an individual's behaviour towards learners and young people immediately to the SALT Director. It is recognised that depending on the role of the DSL in the school, the SALT Director may which to consult with the DSL and take a more collaborative decision-making approach.

24.2.1 If the concern has been raised via a third party, the SALT Director should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

24.2.2 Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

24.3 Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

24.4 Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns (* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible);
- details of the concern;
- context in which the concern arose;
- action taken.

24.5 Records must be kept confidential, held securely and comply with the Data Protection Act 2018. The Training provision will retain such information until the individual leaves their employment.

24.6 Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO (see paragraph 22 above).

24.7 The records' review might identify that there are wider cultural issues within the Training provision that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

24.8 Further support can be found at - https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf

24.9 Low-level allegations about supply staff/contractors should be referred to their employers so that any potential patterns of inappropriate behaviour can be identified. Where there is any doubt about concern meeting the harms threshold, that training provision should consult the LADO.

25.0 Learners with Additional Needs

25.1 Our training provision recognises that all learners have a right to be safe. Some learners may be more vulnerable to abuse, for example those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.

25.2 Learners with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. We understand that additional barriers can exist when recognising abuse and neglect in this group of learners. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners
- the potential for learners with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

25.3 Therefore, any reports of abuse involving learners with SEND will involve close liaison between the DSL and the strand's lead/director.

25.3 When the training provision is considering excluding, either for a fixed term or permanently, a vulnerable learner, we will conduct an holistic multi-agency risk-assessment prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment should be completed prior to convening a meeting of the governing body.

26.0 Private Fostering

26.1 Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of learners's services) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

26.2 The Learners Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.

26.3 Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

26.4 People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Learners/young people who need alternative care because of parental illness;
- Learners/young people whose parents cannot care for them because their work or study involves long or antisocial hours;

- Learners/young people sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee learners/young people;
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- Learners/young people staying with families while attending an training provision away from their home area.

26.5 The Training provision has a mandatory duty to report to the local authority where they are aware or suspect that a young learner is subject to a private fostering arrangement. Although the Training provision has a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the Training provision. However, it should be clear to the Training provision who has parental responsibility.

26.6 Training provision staff should notify the DSL when they become aware of private fostering arrangements.

27.0 Links to additional information about safeguarding issues and forms of abuse

27.1 Staff who work directly with learners/young people, and their leadership team should refer to this information.

27.2 This guide should be used in conjunction with the Spencer Academies Trust local directory of support.

27.3 Guidance on learners in specific circumstances found in Annex A of KCSiE (latest version) and additional resources as listed below:

Issue	Guidance
Abuse/Domestic Abuse	https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-child-sexual-abuse/ https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2 https://www.gov.uk/guidance/domestic-abuse-how-to-get-help https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief https://www.gov.uk/government/collections/disrespect-nobody-campaign https://www.gov.uk/government/publications/tackling-child-sexual-abuse-strategy https://stopabusetogether.campaign.gov.uk/ The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.
Bullying	https://www.gov.uk/government/publications/preventing-and-tackling-bullying
Learners and the Courts/ Family members in prison	https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds https://www.nicco.org.uk/
Child Exploitation	https://www.gov.uk/government/publications/safeguarding-learners-who-may-have-been-trafficked-practice-guidance https://www.gov.uk/government/publications/care-of-unaccompanied-and-trafficked-learners https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit https://www.learnersssociety.org.uk/information/professionals/resources/county-lines-toolkit
Learners Missing from Education, Home or Care	https://www.gov.uk/government/publications/learners-missing-education https://www.gov.uk/government/publications/learners-who-run-away-or-go-missing-from-home-or-care https://www.gov.uk/government/publications/missing-learners-and-adults-strategy
Designated Safeguarding Lead	https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible
Drugs	https://www.gov.uk/government/publications/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives https://www.talktofrank.com/

Issue	Guidance
	https://pshe-association.org.uk/drugeducation
Female Genital Mutilation	https://www.gov.uk/government/collections/female-genital-mutilation https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack
Forced Marriage	https://www.gov.uk/guidance/forced-marriage https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage
Homelessness	https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities
Health & Wellbeing	https://www.pshe-association.org.uk/curriculum-and-resources/resources/rise-above-schools-teaching-resources https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3 https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2 https://www.nhs.uk/mental-health/conditions/fabricated-or-induced-illness/overview/
Online	https://www.childnet.com/resources/cyberbullying-guidance-for-schools http://www.educateagainsthate.com/ https://digisafe.lgfl.net/ https://learning.nspcc.org.uk/research-resources/schools/e-safety-for-schools https://www.saferrecruitmentconsortium.org/ http://www.gov.uk/government/publications/searching-screening-and-confiscation http://www.swgfl.org.uk/ https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation https://www.gov.uk/government/publications/ukcis-online-safety-audit-tool https://www.gov.uk/government/collections/online-safety-guidance-if-you-own-or-manage-an-online-platform https://www.saferinternet.org.uk/advice-centre/parents-and-carers https://www.childline.org.uk/ https://reportharmfulcontent.com/ https://www.ceop.police.uk/safety-centre/ https://www.childnet.com/parents-and-carers/parent-and-carer-toolkit https://parentzone.org.uk/
Private Fostering	https://www.gov.uk/government/publications/learners-act-1989-private-fostering http://privatefostering.org.uk/ https://www.ecpat.org.uk/News/dfe-training-for-foster-carers
Radicalisation	https://www.gov.uk/government/publications/prevent-duty-guidance https://www.gov.uk/government/publications/protecting-learners-from-radicalisation-the-prevent-duty http://educateagainsthate.com/ https://prevent.lgfl.net/
Serious Violence	https://www.gov.uk/government/publications/serious-violence-strategy https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819840/analysis-of-indicators-of-serious-violence-horr110.pdf https://gbr01.safelinks.protection.outlook.com/ https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence https://www.gov.uk/government/publications/tackling-violence-against-women-and-girls-strategy https://www.gov.uk/government/publications/violence-against-women-and-girls-national-statement-of-expectations
Sexual Violence & Harassment Harmful Sexual Behaviour	https://www.barnardos.org.uk/ https://www.lucyfaithfull.org.uk/ https://www.mariecollinsfoundation.org.uk/ https://www.nspcc.org.uk/ https://www.saferinternet.org.uk/ https://rapecrisis.org.uk/ https://www.nice.org.uk/guidance/ng55 https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/ https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework

Issue	Guidance
Support for Victims	https://www.csnetwork.org.uk/en/beyond-referrals-levers-for-addressing-harmful-sexual-behaviour-in-schools https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/ http://www.anti-bullyingalliance.org.uk/ https://www.thesurvivorstrust.org/ https://www.victimsupport.org.uk/ https://www.childline.org.uk/
Sharing Nudes and Semi-nudes	https://sexting.lgfl.net/ https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-learners-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-learners-and-young-people

Part 3: Quality Assurance Commitment

28.0 Quality assurance	*This means that at the SALT provision:*
Quality assurance is about assessing the quality of the work we undertake in safeguarding learners and understanding the impact of this work in terms of its effectiveness in helping learners and young people feel safe. • This Quality Assurance Framework is aimed at: Ensuring that data and quality assurance outputs are regularly reviewed through the SAT audit, the SAT Safeguarding Deep Dive/Inclusion Review, local authority audits and related governance and challenge arrangements. • Ensuring that the safeguarding data our academies generate is of good quality and contributes to a culture and ethos of continuous learning and improvement whereby key learning is embedded into practice, policies and guidance. As a minimum, in order to review safeguarding data, each arm of the training provision will report to governors/strategic boards: • The number of LADO referrals • The number of prevent referrals • The number of FGM referrals • The number of EHA referrals • The number of learners's services referrals • The number of open Child Protection cases • The number of open Child in Need cases • attendance figures • exclusion data The Trust Director of Inclusion will periodically collate and review this information to present to the Board of Directors for review.	*We have an internal half-termly checkpoint to ensure regular dialogue between the SALT Director and DSL and termly checkpoints for the DSL with each strand's lead/director* *We will actively seek learner, staff and where appropriate parent feedback into this process* - taking account of their *opinions and feedback, among all staff (including around workload expectations and statutory guidance, such as that relating to equalities, and established systems) in any measures the training provision may put in place to protect them, including plans for implementing the Prevent Duty* *We will complete the SAT Safeguarding audits on time, implement and review any identified actions by the Director of Inclusion. We will participate fully in Safeguarding Deep Dives and Inclusion Reviews.* *We will report termly to governors/strategic boards, encouraging challenge and review.* *We will participate in activities that demonstrate the strength of partnership working and contribute our data to identify aspects that could have been better.* *Safeguarding leads will quality assure their work through attendance at DSL Network meetings and by asking the following questions:* ***1. How much did we do?*** *(Numbers)* ***2. How well did we do it?*** *(Whole training provision; File and themed audits, partner agency, pupil/parent feedback)* ***3. Are there opportunities to learn and improve?*** *(Could Do Better Still; reflective-learning case studies; local Safeguarding-Practice-Reviews, complaints; inspections)* ***4. Is anyone better off?*** *(Impact)*

Appendices

Appendix 1

Definitions and indicators of abuse

1. Neglect

Neglect is the persistent failure to meet a child/young learner's basic physical and/or psychological needs, likely to result in the serious impairment of the child/young learner's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate 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.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor attendance or often late
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child/young learner is regularly not collected or received from the training provision
- The child/young learner is left at home alone or with inappropriate carers

2. Physical abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted

- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

3. Sexual abuse

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling
- Frequent or openly masturbating, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in the genital area

4. Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse that can happen to any young person. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

(a) In exchange for something the victim needs or wants, and/or
(b) For financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Some learners will be particularly vulnerable to being exploited, for example if they have had a chaotic upbringing or if they are in care or go missing, involved in gangs or being bullied. We recognise however that any child/young learner can become a target for exploitation, particularly where the internet and social media are involved. This is because the normal life events that go with being a child or teenager in today's age can be a challenge and make them susceptible to being groomed and exploited. The presence of any significant indicator for sexual exploitation should trigger a referral to local authority learners's services. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)

- Entering and/or leaving vehicles driven by unknown adults
- Possessing unexplained amounts of money, expensive clothes or other items
- Frequenting areas known for risky activities
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.
- Missing for periods of time (CSE and county lines)

5. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and persistent adverse effects on the child/young person's emotional development. It may involve conveying to learners/young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child/young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on learners. These may include interactions that are beyond the child/young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing learners/young people frequently to feel frightened or in danger, or the exploitation or corruption of learners/young people. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes themselves in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B: Some situations where learners stop communicating suddenly (known as "traumatic mutism") can indicate maltreatment.

6. Domestic Abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a) physical or sexual abuse;

(b) violent or threatening behaviour;

(c) controlling or coercive behaviour;

(d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an

intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to learners if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. Witnessing the domestic abuse of another person is a key indicator of abuse.

(The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted)

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

Where staff have a concern about a child being a victim of domestic abuse, it is the responsibility of DSLs (and deputies) to provide support. It is the responsibility of all staff to refer concerns about domestic abuse to the DSL. Our Training provision will work with external agencies and Early Help teams to ensure that learners are supported to manage their experiences of domestic abuse.

7. Responses from parents/carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to their age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home; or
- Violence between adults in the household
- Evidence of coercion and control.

8. Special Education Needs & Disabled learners or certain health conditions

When working with learners with disabilities or certain health conditions, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

All academies will be mindful that learners with SEND may require extra support to access preventative work in the curriculum to help safeguard them. Such learners are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse.

We know that additional barriers can exist when recognising abuse and neglect in this group of learners which include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners;
- the potential for learners with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying - without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.
- being more prone to peer group isolation than other learners;

Because of these vulnerabilities, we will consider on a case by case basis, the level of pastoral support needed for learners with SEN and disabilities, along with ensuring any appropriate support for communication is in place.

The DSL and SALT Director will work closely together to ensure all staff are supported to understand the additional vulnerabilities of SEND learners, including issues of cognitive understanding.

9. Extra-familial harm

All staff, but especially the DSL (and deputies) will consider whether learners are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

The abuse can be perpetrated by individuals or groups, males or females, and learners or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Appendix 2

Indicators of susceptibility to radicalisation

1. Radicalisation is defined in KCSiE 2022 as:
   The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

2. Extremism is defined by the government in the Prevent Strategy as:
   Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:
   The demonstration of unacceptable behaviour by using any means or medium to express views which:

   - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
   - Seek to provoke others to terrorist acts;
   - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
   - Foster hatred which might lead to inter-community violence in the UK.

4. KCSiE 2022 describes terrorism as 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.

   There is no such thing as a "typical extremist". Those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Learners may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that training provision staff are able to recognise those vulnerabilities and susceptibilities.

6. Indicators of susceptibility include:

   - **Identity crisis -** the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society
   - **Personal crisis -** the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
   - **Personal circumstances -** migration; local community tensions; and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
   - **Unmet aspirations -** the student may have perceptions of injustice; a feeling of failure; rejection of civic life
   - **Experiences of criminality -** which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration
   - **Special educational need -** learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. This list is not exhaustive, nor does it mean that all learners/young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

    - Being in contact with extremist recruiters
    - Family members convicted of a terrorism act or subject to a Channel intervention
    - Accessing violent extremist websites, especially those with a social networking element
    - Possessing or accessing violent extremist literature
    - Using extremist narratives and a global ideology to explain personal disadvantage
    - Justifying the use of violence to solve societal issues
    - Joining or seeking to join extremist organisations
    - Significant changes to appearance and/or behaviour; and
    - Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Preventing violent extremism - Roles and responsibilities of the Single Point of Contact (SPOC)

The SPOC for SALT is **Tammy Elward, Director of SALT**, who is responsible for:

- Ensuring that staff of the training provision are aware that you are the SPOC in relation to protecting learners from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing learners from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of the SALT provision in relation to protecting learners from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the training provision's personal development curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the training provision about the safeguarding processes relating to protecting learners from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the training provision for case discussions relating to learners who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of susceptible learners into the Channel[1] process;
- Attending Channel meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel co-ordinator; and sharing any relevant additional information in a timely manner.

[1] Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Counter Terrorism Policing East Midlands, and it aims to

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be susceptible to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce susceptibility.

Appendix 3

Child Criminal Exploitation (CCE)

The Training provision adheres to the local safeguarding partnership procedure in relation to CCE.

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

(a) in exchange for something the victim needs or wants, and/or
(b) for the financial or other advantage of the perpetrator or facilitator and/or
(c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- learners who appear with unexplained gifts or new possessions;
- learners who associate with other young people involved in exploitation;
- learners who suffer from changes in emotional well-being;
- learners who misuse drugs and alcohol;
- learners who go missing for periods of time or regularly come home late; and
- learners who regularly miss school or education or do not take part in education.

As an Training provision we recognise that prevention is the best position with regard to CCE. We seek to support learners to develop confidence and build resilience. We will endeavour to support their age appropriate knowledge and raise awareness and understanding of what CCE is, to understand the risks of CCE and to spot the warning signs for themselves and also their friends and peers and by doing so keep safe. Much of this work will be through out RSE and Personal Development curriculum.

If prevention is not possible we aim to identify learners who are at risk of, or are being exploited very early, intervention is key to effectively working with the child to prevent or reduce the level of risk. Once they have been groomed some learners will find it difficult to withdraw from their abusers and we need to contribute to helping to protect them. Some learners feel that they are in a relationship with these people. We commit to working with our inter-agency partners to safeguard and protect learners.

An important part of educating our learners is focussing on what is a healthy relationship and issues of consent. This will also target potential abusers at an early age with the intention of helping to shape their attitudes to others. We want to have a culture where the welfare of learners is actively promoted and employees and learners are vigilant. As part of this learners will feel listened to and safe.

Appendix 4

Female Genital Mutilation

FGM is a procedure that includes the partial or total removal of the external female genital organs for non-medical reasons. It is illegal in the UK to subject a child/young learner to female genital mutilation (FGM); to assist or facilitate the practice; or to take a child abroad to undergo the procedure – Female Genital Mutilation Act 2003. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The majority of girls have the procedure between the ages of 5-8 years. It is estimated that 24,000 girls in the UK are at risk and 66,000 women living with the physical and psychological consequences.

Employees and governors need to have an awareness of the signs that a girl may have undergone FGM or be at risk of the practice. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In our Training provision, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and learners's social care. The duty does not apply in relation to at risk or suspected cases. The duty only applies in cases where the victim discloses. If someone else, such as a parent or guardian, discloses that a girl under 18 has had FGM, a report to the police is not mandatory. However, in these circumstances' disclosures should still be handled in line with wider safeguarding responsibilities.

The 'cutting season' during the summer months is often the riskiest time for girls as the healing time required following the procedure, often necessitates it being carried out during the long summer holiday. The main indicators and risk factors are highlighted below but all employees and the nominated governor for safeguarding will need to have undergone at least basic awareness raising training to ensure they can identify when a girl may be at risk.

Training provision employees should be alert to the following indicators:

- The family comes from a community that is known to practise FGM or is less integrated within the community.
- A child/young learner may talk about a long holiday to a country where the practice is prevalent.
- Parents who wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays).
- A child/young learner may talk about 'special female visitors' or 'elder' who are staying with the family, especially during the 'cutting season'
- A child/young learner may confide that she is to have a 'special procedure' or to attend a special occasion or celebration to become a woman
- A child/young learner may request help, directly or indirectly, from a teacher or another adult
- Any female child/young learner born to a woman or has a sister who has been subjected to FGM must be considered to be potentially at risk, as must other female learners in the extended family
- A girl is withdrawn from PSHE/SRE without any specific reason being given
- Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absence, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girls return.

- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs.

Where it is suspected that a girl may have undergone or is likely to undergo FGM, employees must share concerns with the DSL who in turn should consult the MASH.

Where you suspect that FGM has occurred:

- Be sensitive to the child/young learner, and family, be gender sensitive, make no assumptions, be non-judgemental, use simple language, record clearly
- You have a duty to protect, safeguard and share information
- Refer to Learners's Social Care for coordination of careful assessment (not necessarily with consent)
- There will be potential enquiries under Section 47
- Potential police enquiries
- Possible use of police protection or legal orders such as FGM PO, prohibitive steps but not necessarily the removal of the child/young learner.

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers.** If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Appendix 5
Serious Violence

All staff must be aware of indicators which may signal that learners are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the training provision
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault of unexplained injuries.

Unexplained gifts or new possessions could also indicate that young learners have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see Appendix 3).

All staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child/young learner maltreatment and having been involved in offending, such as theft or robbery.

Further advice is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of learners and vulnerable adults: county lines guidance.

Appendix 6
Online Safety

Our training provision ensures that learners are able to use the internet and related communications technologies appropriately and safely and this is part of our wider duty of care. We recognise that the use of technology can be a significant component of many safeguarding issues including child sexual exploitation; radicalisation and sexual predation.

Our learners and young people are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum through our Personal Development approach. Learners are taught to recognise when they are at risk and how to get help when they need it.

Online safety covers the safety issues associated with all information systems and electronic communications as a whole. This encompasses not only the internet but all wireless electronic communications including mobile phones, games consoles, cameras and webcams. It also needs to consider the increasing mobility of access to digital technology through the range of mobile devices.

We recognise that many learners have unlimited and unrestricted access to the internet via mobile phone networks (ie 3G, 4G and 5G). Technology often provides a platform to facilitate harm. However, it important to remember that the issue at hand is not the technology but the behaviour around how it is used; the use of new technologies in education brings more benefits than risks.

We will ensure that we meet our statutory obligations to ensure that learners and young people are safe and are protected from potential harm, both within and outside our training provision. This also forms part of our training provision's protection from legal challenge, relating to the use of digital technologies.

There are additional duties under the Counter Terrorism and Securities Act 2015 which requires our Training provision to ensure that learners are safe from terrorist and extremist material on the internet.

Our training provision will ensure that there are filters and monitoring systems in place to limit exposure to risks when learners are using the Training provision's IT systems and technology that can be used online, and these will be regularly reviewed in line with the appropriate ICT standards and guidance. In our Training provision the filtering software we use is NetSupport and it is regularly reviewed for effectiveness and updated. However, many learners are able to access the internet using their own data plan. To minimise inappropriate use, as an Training provision we require all learners to complete a ICT Acceptable Use (**see here**) declaration on an annual basis**.** In general, we also recommend all learners follow their school's guidance on mobile phone use whilst situated on site with learners.

Our training provision recognises that whilst we have appropriate filters and monitoring systems in place, we also do not "over block" so that we do not restrict this teaching opportunity to teach learners about keeping safe online.

We observe our responsibilities under the relevant Data Protection Act and DfE Guidance Document Teaching Online Safety in Schools (2019) https://www.gov.uk/government/publications/teaching-online-safety-in-schools.

Coronavirus (COVID-19): keeping learners safe online – the SALT provision continues to consider the safety of learners when they are asked to work online. The starting point for online teaching is that the same principles as set out in the Trust code of conduct should be followed. This policy, amongst other things, includes acceptable use of technologies, staff/student relationships and communication including the use of social media. The policy applies equally to any existing or new online and distance learning arrangements which are introduced.

We will continue to ensure any use of online learning tools and systems is in line with privacy and data protection requirements.

Appendix 7
Sharing Nudes/Semi-nudes

The SALT provision recognises that the sharing of nude/semi-nude images is a form of sexual abuse and can be part of peer on peer interaction. The sharing of nude/semi-nude images can expose learners to risks, particularly if the imagery is shared further. It can lead to embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing images of under-18's is illegal.

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by learners and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of sexual abuse and must be referred to the police as a matter of urgency.

This guidance is based on the UKCCIS Sexting in Schools and Colleges guidance 2020. This guidance covers:

- A person under the age of 18 who creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 who shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 who is in possession of sexual imagery created by another person under the age of 18

It does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes sexual abuse and academies should always inform the police and CSC.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

The term '**youth produced sexual imagery'** (previously referred to as sexting) has been adopted to provide some clarity and to distinguish it from imagery where there are adults involved in some manner.

The purpose of this guidance is to make expectations clear to young learners and their parents and carers as well as to be clear to employees about the training provision's policy and procedure in responding to incidents.

The police accept that the law which criminalised indecent images of learners was created before the technological advances of today and it originally sought to protect learners from adults. It was not intended to criminalise learners. Despite this, learners who share sexual imagery of themselves or peers are breaking the law and therefore we will seek to manage this type of case appropriately. All professionals including the National Police Chiefs Council agree that incidents involving youth produced imagery should primarily be treated as a safeguarding issue.

The Training provision is therefore empowered to deal with the majority of these incidents without involving the police.

Handling Incidents

All incidents will be followed in line with our safeguarding and child protection policy. Where an incident comes to our attention staff will:

- **report it the DSL (or deputy) immediately;**
- **Never** view, copy, print, share, store or save the image, or ask a child/young learner to share or download – **this is illegal**;
- report to the DSL if they have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), and seek support;
- **not** delete the image or ask the young person to delete it;
- **not** ask the learners or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL;
- **not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers;
- **not** say or do anything to blame or shame any young people involved;
- explain to the child/young learner that the incident needs to be reported and reassure them that they will receive support and help from the DSL.

Further to this:

- the incident should be referred to the DSL (or equivalent) as soon as possible
- the DSL (or equivalent) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- there should be subsequent interviews with the learners or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral should be made to learners' social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

An immediate referral to learners' social care and/or the police should be made if at the initial stage:

- The incident involves an adult
- The child/young learner has been coerced, blackmailed or groomed or if there are concerns about capacity to consent
- If the sexual acts are unusual for the developmental age or violent
- Learners under 13 years are involved
- The child/young learner is at immediate risk e.g. suicidal or self-harming

Where the above do not apply then the Training provision will generally deal with this matter without involving the police or learners' social care although this will be subject to review.

This issue will be taught as part of a wider RSE/Personal Development curriculum and through IT curriculum work to underpin our preventative work on e-safety.

Appendix 8

Role of the Appropriate Adult - Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for learners to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned[2] before questioned about an offence[3], or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child/young learner:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
    a. a police officer;
    b. employed by the police;
    c. under the direction or control of the chief officer of a police force; or
    d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

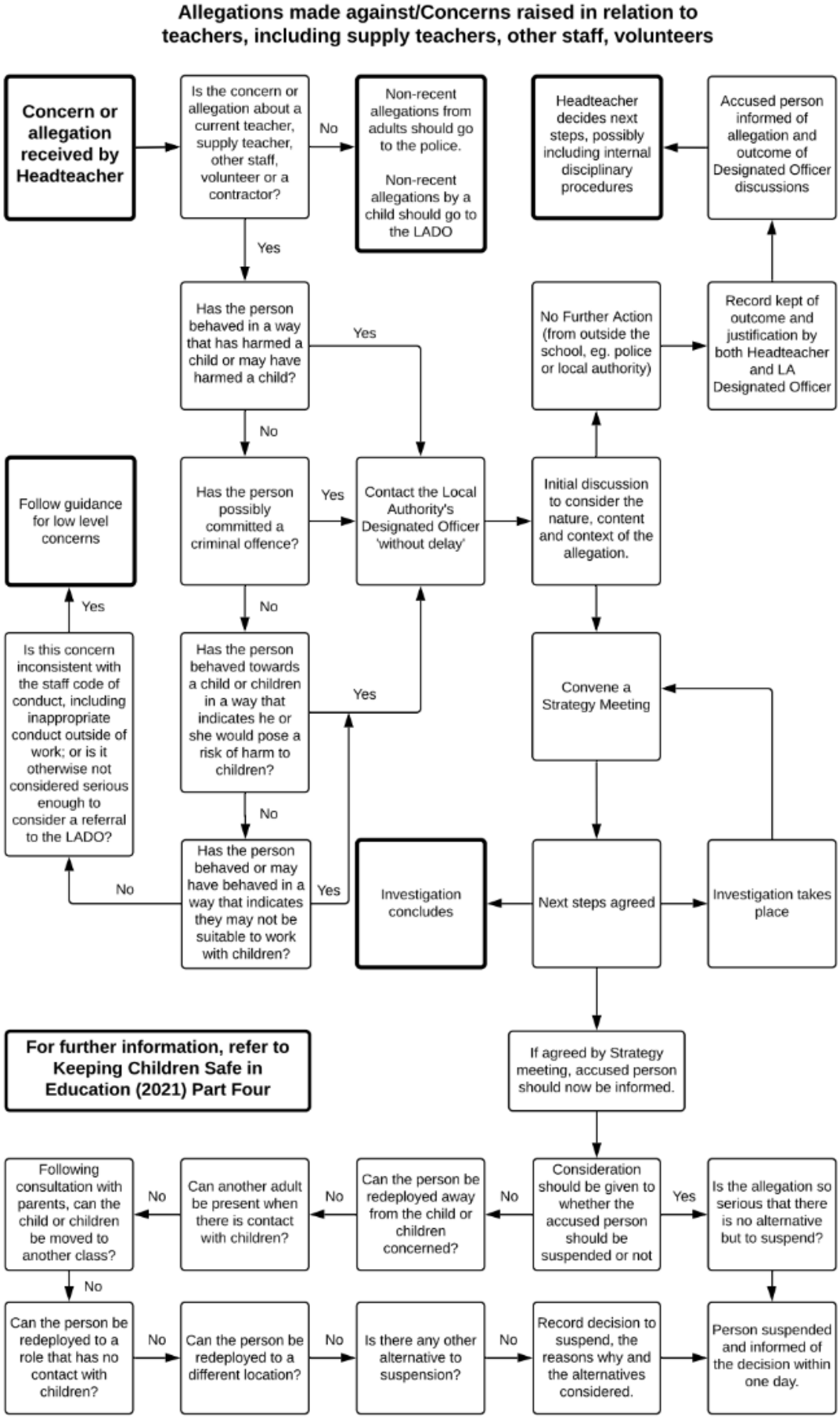
https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

[2] The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

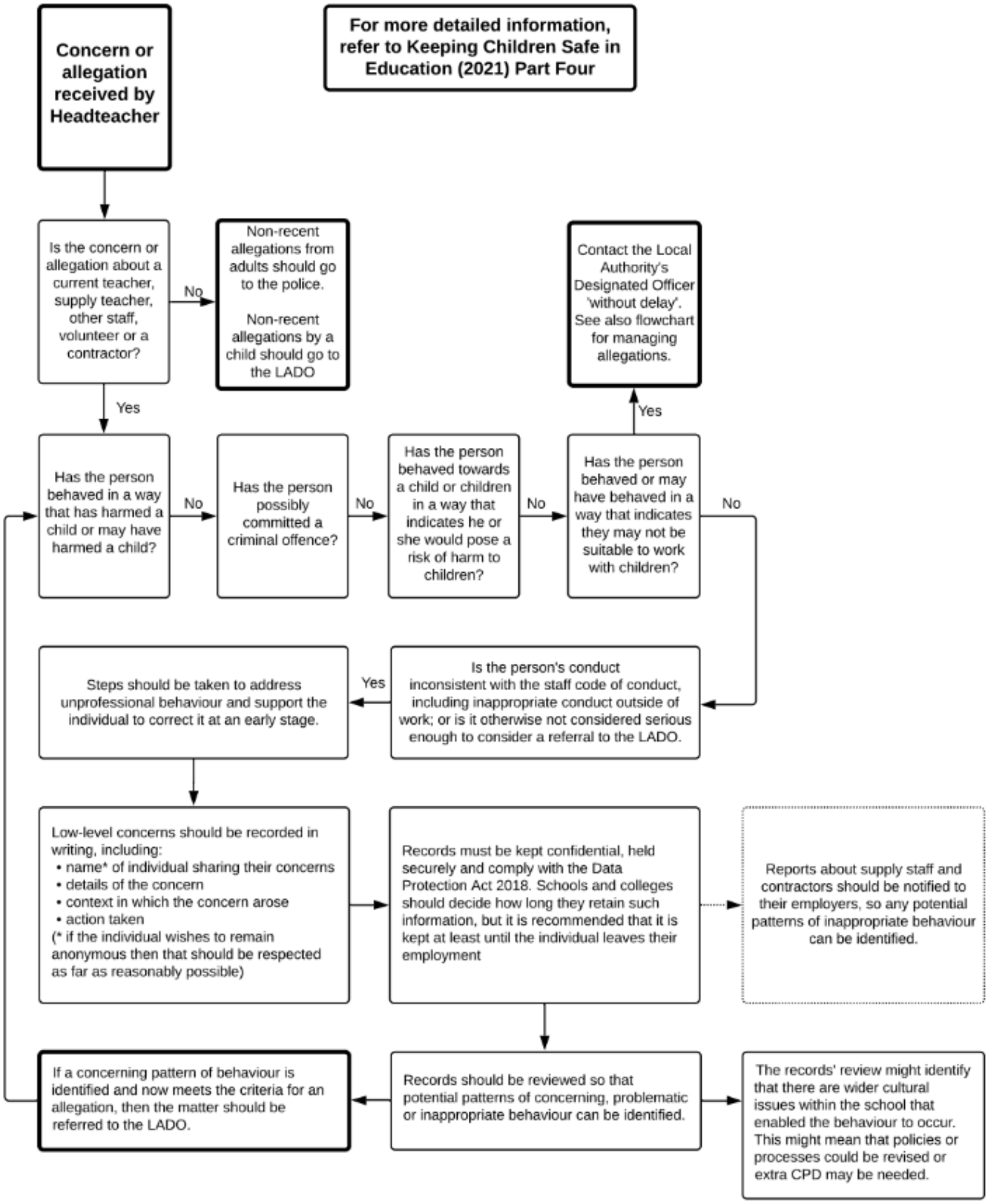
[3] A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

Appendix 9

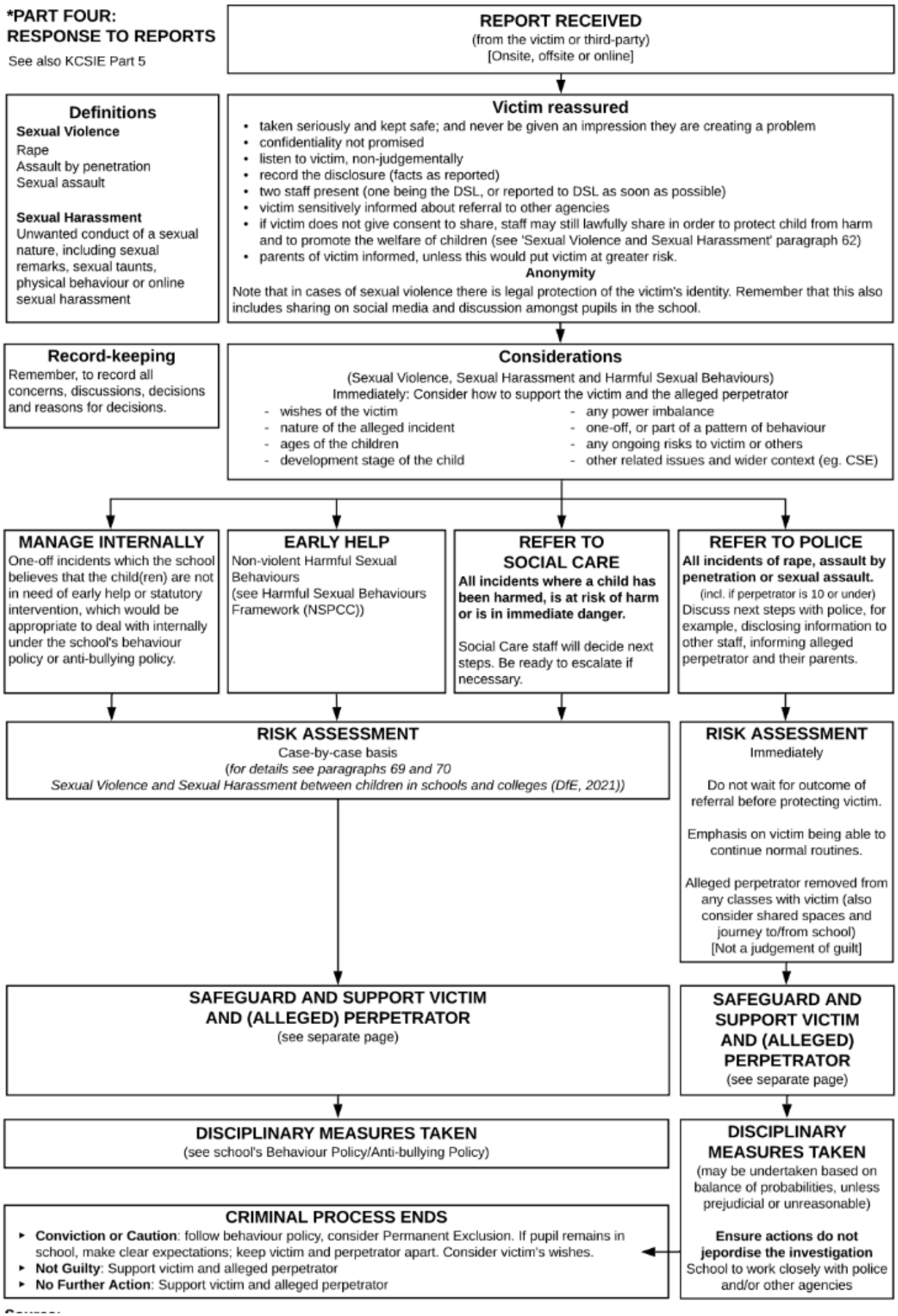
Flowcharts



Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



Managing Reports of Sexual Violence/Sexual Harassment



Appendix 10

The Role of the DSL

Spencer Alliance for Leadership and Teaching:

Safeguarding: The Role of the DSL 2022-23

Drawing from the advice and guidance in the September 2022 KCSIE (see appendix 1), the SALT Team have developed a role descriptor for our Designated Safeguarding Lead, linking to the statutory requirements for our arms of work:

- ITE Ofsted Requirements (appendix 2) and ITT Criteria and Supporting Advice (appendix 3)
- FE Ofsted Requirements (appendix 4) and
- Prevent Duty Requirements (appendix 5)
- Ofsted Research and Analysis: Review of Sexual Abuse in Schools and Colleges (appendix 6)
- NPQ and ECF Ofsted Requirements (appendix 7).

Definitions

The term 'learners' is used here to cover apprentices, SCITT trainees and participants on programmes and engaging with our AB Services as part of the Teaching School Hub. This reflects the broad scope of our engagement with young and adult learners

Purpose

Within these arms, the core themes that impact on the role of the DSL include:

- Cultivating a culture of safeguarding at all levels of the organisation
- Ensuring effective safeguarding arrangements, including e-safety, including where arrangements are age-appropriate, taking account of the age and vulnerability of the learners involved
- Promoting equality and diversity
- Eliminating discrimination
- Supporting the Prevent Duty in reducing the risk of radicalisation of learners

The Designated Safeguarding Lead

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the training provision's **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding, child protection and learner safeguarding (including online safety). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the training provision to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on learner welfare and safeguarding, including vulnerable learners protection, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of learners.

Deputy Designated Safeguarding Leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Due to the size of the team, the SALT Team have made the decision to not appoint a deputy DSL, but have a designated Prevent Lead and in-team Mental Health First Aider.

SALT Team Roles and Responsibility

Caroline Arnold
SALT Team Designated Safeguarding Lead
ITT Director and TSH Assistant Director
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Vicki Ilic
Mental Health and Wellbeing First Aider
SCITT Coordinator
vilic@george-spencer.notts.sch.uk

Tammy Elward
Prevent Lead and LGBTQ+ Trusted Link
SALT Director
tammyelward@satrust.com

Safeguarding is everyone's responsibility

Availability

During term time the designated safeguarding lead should always be available (during training provision hours) for staff in the training provision to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead would be expected to be available in person, it is a matter for individual schools, colleges and training providers, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage Referrals

The designated safeguarding lead within the SALT Team is expected to report and monitor incidents of

- discrimination and/or harassment,
- Prevent Duty related concerns,
- sexual harassment and violence and
- online sexual abuse.

They are also expect to manage ongoing compliance and allegations about adults who may be a risk to children and vulnerable adults.

Where thresholds have been met, they will also refer cases:
• to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
• where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
• where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Where there is a concern about pupils, our DSL will work with that school's Safeguarding team, reporting concerns directly of suspected abuse and neglect, where in-school procedures take precedence.

Managing Safer Recruitment Practices within the Provision

The designated safeguarding lead within the SALT Team is expected to ensure safe recruitment where both the SCITT and Apprenticeship team:
• apply appropriate pre-selection checks
• consider Disclosure and Barring Service (DBS) criminal records checks and children's barred list information.
• confirm in writing to schools that a non-salaried trainee's criminal record check, including a check of the children's barred list, has been completed and that the individual has been judged by the provider to be suitable to work with children.
• check that a trainee has not previously been removed from a programme because they have behaved in a way that indicates they may not be suitable to work with children, or if the previous provider would have removed the trainee had they not left.

• may recommend to applicants that are checked early in the recruitment cycle that they register with the DBS update service.

Working with Others

The designated safeguarding lead is expected to:

• act as a source of support, advice and expertise for **all staff**;
• act as a **point of contact with the safeguarding partners**;
• **liaise with the Director of SALT** to inform him or her of issues- especially ongoing enquiries and police investigations. This should include being aware of the requirement for 'juveniles' (young adults below 18) or vulnerable adults to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019 (see 1.7)
• **liaise with staff** (especially directors of each arm of work, facilitators, the Prevent Lead, the Mental Health First Aider and Trust Safeguarding Lead) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that learners' needs are considered holistically;
• **work with the Prevent Lead** protect learners from the dangers of radicalisation and extremism in accordance with the 'Prevent' duty guidance, monitoring the Risk Register and Action Plan
• **liaise with the Mental Health First Aider and Trust Safeguarding Lead**, where safeguarding concerns are linked to mental health;
• **Ensure that partnership agreements** for both the SCITT and Apprenticeship Provision specify the different roles within the partnership including: the promotion of equality of opportunity; and the safeguarding of children and young people
• promote supportive engagement with **parents and/or carers** in safeguarding and promoting the welfare of young adults and vulnerable adults, including where families may be facing challenging circumstances;
• work with the SALT Director and relevant strategic leads, taking lead responsibility for **promoting educational outcomes** by knowing the welfare, safeguarding and protection issues that learners, especially vulnerable learners and young learners, are experiencing, or have experienced, and identifying the impact that these issues might be having on learners' attendance, engagement and achievement at training provision[4]. This includes:

- **o** ensure that the training provision knows who its cohort of learners who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- **o** support coordination and facilitation staff to provide additional academic support or reasonable adjustments to help learners who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on learners' educational outcomes.

Information Sharing and Managing the Concerns and Safeguarding Reporting Forms

The designated safeguarding lead is responsible for ensuring that learner concerns files on My Concern are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate file for each learner.

Records should include:

• a clear and comprehensive summary of the concern;
• details of how the concern was followed up and resolved;
• a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where learners leave the training provision, the designated safeguarding lead should work with the Trust Safeguarding Lead, other appropriate agencies working with the learner, and the learner themselves to assess whether any information is passed onto the new training provision.

Where learners are below the age of 18, this should be completed as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving colleges and training providers should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Raising Awareness

The designated safeguarding lead should:

[4] We recognise that in some settings there may be a different strategic lead for promoting the educational outcomes of children who have or have had a social worker, particularly in larger schools or colleges. Where this is the case, it is important that the DSL works closely with the lead to provide strategic oversight for the outcomes of these children and young people.

Pupil and Learner Safeguarding

• ensure each member of staff and learners have access to, and understands, the key principles of safeguarding, signposting individual schools' child protection policy and procedures;
• ensure trainees and apprentices are taught how to promote pupils' safety and welfare, that they understand their statutory safeguarding duties (including the 'Prevent' duty) and responsibilities.
• ensure vulnerable and young leaners have additional support and learners identified as LAC continue to receive additional support and monitoring up to 21
• ensure schools, at the start of each school placement, provide all trainee teachers with:
  - the child protection policy
  - the staff behaviour policy (sometimes called a code of conduct)
  - information about the role of the designated safeguarding lead
  - a copy of Keeping Children Safe in Education
• ensure that ECTs and NPQ participants understand the importance of promoting inclusion, equality and diversity and safeguarding, including the 'Prevent' duty.

Learner Safeguarding

a) Safeguarding and Whistleblowing

• ensure each member of staff has access to, and understands, the SALT Team's safeguarding policy and procedures, especially new and part-time staff;
• ensure the SALT Team's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
• ensure all staff, facilitators, mentors, coaches and learners are aware how they can raise concerns about safeguarding or equalities
• ensure routine record keeping, monitoring and analysis, including of incidents of discrimination harassment, Prevent concerns, sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse – where applicable inform staff professional development and improvement of processes and procedures
• ensure all staff are aware of the Whistleblowing Policy; and where appropriate handle safeguarding allegations about staff members
• ensure the safeguarding policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the training provision in this;
• link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
• help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

b) Personal Development

• ensure each member of staff has access to, and understands, the SALT Team's Personal Development Curriculum Entitlement, especially new and part-time staff;
• promote curriculum adaption within each strand to ensure that training and professional development programmes promote (through a carefully sequenced curriculum offer) personal development themes including
  - high standards for personal and professional conduct (and awareness of policies where appropriate);
  - fundamental British values, supporting them in becoming responsible, respectful and active citizens
  - learner character, developing learners' confidence, resilience and knowledge so that they can keep themselves mentally healthy, including strategies for managing workload
  - maintaining an active lifestyle and physical health
  - how to access welfare support, from within the SALT Team and other institutions, so that learners, e.g. ECTs and NPQ participants and mentors, receive appropriate and timely professional and pastoral support

c) Diversity

• ensure each member of staff has access to, and understands, the SALT Team's equality and diversity policy, especially new and part-time staff;
• ensure the SALT Team's equality and diversity policy is reviewed annually (as a minimum) and work with governing bodies or proprietors regarding this;
• promote curriculum adaption within each strand to ensure that training and professional development programmes promote knowledge and application of:
  - fundamental British values;
  - understanding and appreciation of diversity celebrating what we have in common;
  - promoting respect for the different protected characteristics set out in the Equality Act 2010.

d) Prevent

• **work with the Prevent Lead** to protect learners from the dangers of radicalisation and extremism in accordance with the 'Prevent' duty guidance, ensuring all staff are aware of the Risk Register and Action Plan
• work with the Prevent Lead to share information across the relevant curriculum areas within the training provision, with a single point of contact for operational delivery of Prevent-related activity
• ensure active engagement from governors, boards, directors, leadership team members, with other partners including police and BIS regional higher and further education Prevent co-ordinators

e) IT and Online Safety

• work with the IT Provider to ensure staff are aware of IT policies in place, including filtering as a means of restricting access to harmful content, and ensure learners are aware pf policies relating to the acceptable use of their IT equipment
• ensure learners know how to keep themselves safe online and where they can share their concerns for themselves and other learners

Managing Event and Site Safety

The designated safeguarding lead within the SALT Team is expected to ensure the safety of its training provision by:
• ensuring staff are compliant with the trust protocols for the physical security of the estate and the **Trust Visitor's Policy** (including appropriate DBS checks of facilitators and DBS Letters of Assurance for Participants)
• ensuring sufficient onboarding procedures for guest facilitators and pre-event checks for materials, so as to not provide a platform for offences relating to the Prevent Duty to be committed.

Training, Knowledge and Skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of learners, as well as specific harms that can put learners at risk, and the processes, procedures and responsibilities of other agencies, particularly social care, so they:
• identify children and learners who may need early help, and who are at risk of harm or have been harmed. This can include, but is not limited to, neglect, abuse (including by their peers), grooming or exploitation secure the help that children and learners need and, if required, refer concerns in a timely way to those who have the expertise to help
• **understand the assessment process** for providing early help and statutory intervention, including local criteria for action and local authority social care referral arrangements;[5]
• understand the importance of the role the designated safeguarding lead has in **providing information and support to social care** in order to safeguard and promote the welfare of vulnerable learners;
• understand the lasting impact that adversity and trauma can have, including on learners' behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
• are alert to the **specific needs of vulnerable learners**, those with special educational needs and disabilities (SEND), those with relevant health conditions and (young) carers;[6]
• understand the **importance of information sharing**, both within the training provision, and with the safeguarding partners, other agencies, organisations and practitioners;
• understand and support the training provision with regards to the requirements of the **Prevent duty** (actively engaging with training provided through the network of Prevent co-ordinators)and are able to provide advice and support to staff on protecting learners from the risk of radicalisation;
• are able to understand the unique risks associated with **online safety** and be confident that they have the relevant knowledge and up to date capability required to keep learners safe whilst they are online at training provision;
• can recognise the additional risks that learners **with special educational needs and disabilities (SEND) face online**, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
• obtain access to resources and attend any relevant or refresher training courses; and,
• encourage a culture of actively engaging **learner voice and stakeholder engagement** and taking account of their opinions and feedback.

In addition to the formal training set out above, **their knowledge and skills should be refreshed** (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding

[5] Full details in Chapter one of Working Together to Safeguard Children.
[6] Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing Support to Staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

• ensure staff understand the factors that make people vulnerable and develop awareness of the indicators:
  - recognise indicators for concerns, including mental health and wellbeing;
  - understand the definitions of sexual harassment and sexual violence, including online sexual abuse;
  - identify early signs of peer-on-peer sexual abuse;
  - recognise indicators for learners being drawn into terrorism and to challenge extremist ideas
• ensure that staff are supported during the referrals processes; and
• support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
• ensure relevant training for governors

Understanding the Views of Learners

It is important that learners feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

• encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, and in any measures the training provision may put in place to protect them; and,
• understand the difficulties that learners may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

• encourage a culture of actively engaging **learner voice and stakeholder engagement** and taking account of their opinions and feedback, among all staff (including around workload expectations and statutory guidance, such as that relating to equalities, and established systems) in any measures the training provision may put in place to protect them, including plans for implementing the Prevent Duty.

Holding and Sharing Information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE 2022, and therefore the designated safeguarding lead should be equipped to:

• understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
• understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
• be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Appendix 11

Education Development Trust – ECF & NPQ Safeguarding Statement

June 2023

Safeguarding Statement Update:

It is our legal and moral duty to ensure the protection of our beneficiaries – both children and adults, and all those who come into contact with us through the course of our work. Our robust safeguarding policies encompass our UK and international work, and we are committed to ensuring that all our beneficiaries receive the same level of protection and care by our vigilant and dedicated people.

Everyone is responsible for safeguarding, irrespective of their level of contact with programme participants, and must remain alert to issues, reporting concerns and disclosures.
As a reminder, as stated in the Delivery Partner subcontract, Delivery Partners are required by Education Development Trust to:

- undertake at their own expense any suitability, safeguarding or other compliance or monitoring checks, including where appropriate a Disclosure and Barring Service (DBS) check, or at Education Development Trust's discretion provide Education Development Trust with such information and/or documentation as may be required in order to comply with such checks. Education Development Trust will reserve the right to terminate the contract if the results of any such check are unsatisfactory to Education Development Trust or the Client.
- Escalate issues of concern, particularly in relation to safeguarding, retention or programme quality to the EDT Partnership and Recruitment Manager.

Disclosures by programme participants
Whilst the majority of, if not all, ECPDP & NPQ programme participants do not fall under the definition of an adult at risk (also referred to as a vulnerable adult), as a programme participant they are a direct beneficiary of EDT, and we therefore have a duty of care towards them. If a programme participant discloses to an EDT employee that they are suffering abuse in some way, the following advice must be adhered to:

The employee must not provide any advice but should:

- Listen and stay calm
- Not rush the person to speak
- Not investigate or ask leading questions
- Not express their own judgements or feelings

The employee must not provide any advice but should suggest that the individual speaks to:

- Someone they trust in their life
- The principal/headteacher/manager at their school or setting
- A GP

If the individual states that they are at immediate risk of harm, they must be advised to call 999.

Safeguarding allegations and concerns about a programme participant
If an employee has a concern about a programme participant's ability to keep children safe through the course of their work, they should discuss this with their line manager and make a report to the Designated Safeguarding

Lead, Marisa Sefton - MSefton@edt.org, who will make a report to the relevant school's principal/headteacher/manager.

Within schools and nurseries, all staff safeguarding allegations and concerns must be reported to the principal/headteacher/manager and not the school or setting's DSL.

The principal/headteacher/manager will lead on actions in managing staff safeguarding allegations and concerns reported to them, and EDT will liaise with them and any statutory authorities that may become involved in managing the matter.

The DSL will upload a report to MyConcern and will ensure that there is a confirmed outcome by the school prior to closing the case on the portal.

Safeguarding allegations and concerns during a Delivery Partner or Education Development led session

Any safeguarding concerns relating to Delivery Partners and their staff must be promptly reported to the UKES DSL who, with advice from corporate safeguarding, will submit a report to the Delivery Partner lead and will liaise with them or their safeguarding lead, to ensure that concerns are fully addressed and all relevant escalations to statutory authorities are completed.

UKES DSL/Deputy DSL and corporate safeguarding contact details:

	Name	**Email**	**Telephone No.**
Designated Safeguarding Lead	Marisa Sefton	MSefton@edt.org	07468 474773
Deputy Designated Safeguarding Lead	Richard Warenisca	RWarenisca@edt.org	