THRIVE LINCS LTD SAFEGUARDING POLICY

Registered No. 14878964

Safeguarding Policy

At Thrive Lincs Ltd the name persons with responsibilities for safeguarding are:

Designated Safeguarding Lead	Poppy Haggis
Deputy Designated Safeguarding Lead	Mark Haggis
Designated LAC	Poppy Haggis

The names personnel with designated responsibility regarding allegations are:

Concern or disclosure (not involving Specialist Staff)	Inform DSL (Poppy Haggis)
Allegation against staff member	Head tutor

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INTRODUCTION

The aims of these procedures are:

- To clarify roles and responsibilities of everyone within our setting in relation to Child Protection and safeguarding.
- To have clear procedures that are followed when a child is identified as needing more than universal services can provide.
- The term "child "or "children" refers to anyone under the age of 18 years.

SECTION 1 SCHOOL COMMITMENT

This policy applies to all adults, including volunteers, working in or on behalf of the Education centre.

We aim to work in partnership with, and have an important role in, inter-agency safeguarding arrangements as set out by *Keeping Children Safe in Education* (2025), Working *Together to Safeguard Children* (2025), Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014. Everyone working in or for our education provider shares an objective to help keep children and young people safe by contributing to:

- providing a safe environment for children and young people to learn and develop in our setting, and.
- identifying children and young people who are suffering or likely to suffer significant harm and taking appropriate action with the aim of making sure they are kept safe both at home and in our setting.

Additional legislation which informs our policy also includes:

- *The Children Act* 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

- Section 5B(11) of the *Female Genital Mutilation Act* 2003, as inserted by section 74 of the *Serious Crime Act* 2015, which places a statutory duty on teachers/tutors to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- *The Rehabilitation of Offenders Act* 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the *Safeguarding Vulnerable Groups Act* 2006, which defines what 'Regulated activity, in relation to children.
- Statutory guidance on the Prevent duty, which explains staff duties under the *Counter Terrorism and Security Act* 2015 with respect to protecting people from the risk of radicalisation and extremism.
- *Online Safety Act* 2023, which sets out duties to protect children online.
- *Domestic Abuse Act* 2021, which strengthens safeguarding for children affected by domestic abuse.
- *Relationships, Sex and Health Education Regulations* 2019, which sets statutory requirements for safeguarding education.
- *Police, Crime, Sentencing and Courts Act* 2022, which establishes the serious violence duty.

Thrive Lincs Ltd is committed to safeguarding and promoting the well-being of all of its students. Each student's welfare is of paramount importance. We recognise that some children may be especially vulnerable to abuse. We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst with us, behaviour may be challenging. We recognise that they may exhibit concerning behaviours, and at times, this may impact on other children either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all of our students. The purpose of the policy is to ensure that:

- The welfare of the child is paramount.
- All children regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection.
- All staff have an equal responsibility to act on suspicion or disclosure that may suggest a child is at risk of harm.
- Students and staff involved in safeguarding issues receive appropriate support.
- Staff adhere to a Code of Conduct and understand what to do if a child discloses any allegations against teaching staff and/or the head tutor: Thus, we are:
- Establishing a safe environment in which children can learn and develop.
- Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children. Raising awareness of safeguarding issues and equipping children and young adults with the skills needed to keep them safe.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting students who have been abused in accordance with his/her agreed Child Protection plan. The procedures contained in this policy apply to all staff, volunteers, students or anyone working on behalf of Thrive Lincs.

Safeguarding Policy

INTRODUCTION AND OVERVIEW

The focus of the law is on "safeguarding and promoting the child's welfare" (*Children Act 1989).* Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best life chances. *Working Together to Safeguard Children DfE 2025*

There is a duty to take action to protect a child if there is cause to believe they are suffering or are likely to suffer "significant harm" and that the harm or likelihood of harm is attributable to a lack of adequate parental care or control. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk.
Tutors/staff are required to safeguard children's welfare and maintain public trust in the teaching profession as part of their professional duties.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Our staff are frequently in a position to identify concerns early and provide help for children, preventing problems from escalating. Our staff need to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.
On occasions, our staff may be called on support a child's/family's social worker.

Child is defined as someone under the age of 18. (S105 of *The Children Act* 1989) (*Keeping Children Safe in Education* (2025)) Staff refers to all those working for or on behalf of Thrive Lincs Ltd in either a paid or voluntary capacity.

Parents refers to birth parents and other adults who are in a parenting role: stepparents, foster parents, carers and adoptive parents.

Child Protection refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
In our setting context, this means:

- keeping children safe from abuse and harassment.
- providing a safe environment in which children can learn.
- Staff acting in the interests of the child, when considering welfare.
- being alert to signs of abuse both in our setting and from outside.
- identifying children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and to take appropriate action, working with other services as needed.
- Staff maintaining an attitude of 'it could happen here'.
- dealing appropriately with every complaint and disclosure.
- designing and promoting procedures which promote these aims and which, so far as possible, ensure that staff and others who are innocent are not subjected to or prejudiced by false accusations.
- Understanding that a child going missing is a potential indicator of abuse or neglect.

• Ensuring that the setting has clear procedures in place for protecting children at risk
of radicalisation. Our setting is firmly committed to implementing the national Prevent strategy and undertakes regular staff training to keeping children safe from the risk of radicalisation.

SECTION 1 STUDENT INFORMATION

2.1 In order to keep children safe and provide appropriate care for them our setting requires accurate and up to date information regarding:

• names, contact details and relationship to the child of any persons with whom the child normally lives.
• names and contact details of all persons with parental responsibility (if different from above).
• emergency contact details (if different from above). Our setting encourages all parents and carers to provide more than one emergency contact, providing our setting with additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern.
• any relevant court orders in place including those which affect any person's access to the child (Residence Order, Contact Order, Care Order, Injunctions, etc.).
• whether the child is or has been subject to a Child Protection plan.
• whether the child is or has been subject to an Early Help Assessment (EHA) or Child in Need (CIN) processes; • whether the child is a Looked After Child (LAC) or previously looked after.
• Name and contact detail of GP.
• any other factors which may impact on the safety and welfare of the child. Our setting will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting data protection and safeguarding requirements.

TRANSFER OF FILES

When a child leaves our setting, the student record, including Child Protection file which is separated from the main student record in a sealed envelope clearly marked as such, is transferred to the new education provider as soon as possible. If this is the case, the file is transferred with an accompanying list of the files, e.g. student file, Child Protection file, by recorded delivery and signed for. The Child Protection file is clearly marked Child Protection, Confidential, for attention of Designated Safeguarding Lead, and a receipt of this transfer will be retained. The receiving education provider should sign a copy of the list to say that they have received the files and return that to the sending education provider for tracking and auditing purposes. This information should be added to a record of transfer which the sending education provider keep until the child reaches their 25th birthday and must contain:

• Name & DOB of child.
• Name & address of receiving education provider.
• Date file(s) transferred with name and role of person who received it.

- Date sending education provider received confirmation of receipt of files from receiving
education provider.
- Summary of case at the time of transfer e.g. Child Protection Plan: Neglect.

In addition to the Child Protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new education provider in advance of a child leaving, for example, information that would allow the new education provider to continue supporting victims of abuse and have that support in place for when the child arrives.

The student record should not be cleared or reduced before transfer to the next education provider unless any records with a short retention period have been placed in the file. It is important to remember that the information, which may seem unnecessary to the person reading the file may be a vital piece of information required at a later stage. Electronic documents that relate to the student file also need to be transferred, or, if duplicated in a master paper file, destroyed. As a sending education provider, we do not need to keep copies of any records in the student record except if there is an ongoing legal action when the student leaves the provision. Custody of and responsibility for the records passes to the education provider the student transfers to. The education provider which the student attended until statutory school leaving age is responsible for retaining the student record until the student reaches the age of 25 years. Our setting retains a copy of the child's chronology and any documents that the education provider created e.g. risk assessment in an archive until the child reaches the age of 25 years, the receipt of the transferred file is kept alongside this archive. Any archived files are stored securely in the same way as an active file. If any records relating to Child Protection issues are placed on the student file, it should be in a sealed envelope and then retained for the same period of time as the student file. (DOB + 25 years).

SECTION 3 ROLES AND RESPONSIBILITIES

3.1 Our head tutor will ensure that:

- The policies and procedures adopted by the Head Tutor are fully implemented and followed by all staff.
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings and contributing to the assessments of children.
- There are arrangements in place for safeguarding supervision for the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead(s).
- All staff feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies. The NSPCC's 'What you can do to report abuse' dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding Child Protection failures internally or have concerns about the way a concern is being handled by their

education provision. Staff can call 0800 028 0285 – line is available from 8.00 am to 8.00 pm Mon-Fri and email: help@nspcc.org.uk.

- There is always adequate cover if the DSL is absent.
- The Designated Safeguarding Lead is supported in providing a contact for the education provision to provide a report and attend Initial Child Protection Case Conferences, Reviews and Looked After Children Reviews out of education term time when needed.
- Allegations regarding staff, or any other adults in our setting, are referred to the Local Authority Designated Officer (LADO), as set out in the Managing Allegations procedure.
- Ensure that staff (including temporary staff) are informed of our systems which support safeguarding, including this policy, as part of their induction; understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins our setting and via Thrive Lincs Ltd website.
- Acting as a 'case manager 'in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Individuals are referred to the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child). This is a legal duty placed upon the school.
- Safeguarding concerns and patterns are reviewed to ensure improvement.

3.2 The Designated Safeguarding Lead in our setting

All Education provisions are required to appoint a 'Designated Safeguarding Lead' to coordinate the Child Protection procedures in the education provision. The DSL is a member of the senior team. The DSL holds a record (and the relevant case notes) of all students who are, or have been, on a Child Protection care plan.

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

- Provide advice and support to other staff on child welfare and Child Protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to
do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's
social care, Channel programme, Disclosure and Barring Service, and/or police), and support
staff who make such referrals directly.

The DSL will also keep the head tutor informed of any issues and liaise with local authority case managers and designated officers for Child Protection concerns as appropriate.

The full responsibilities of the DSL and [deputy] are set out in their job description.

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The DSL and the Deputy Safeguarding Lead take lead responsibility for safeguarding and Child Protection at Thrive Lincs Ltd and work with a team of senior and pastoral staff.

This team comprises: the Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead(s), the head tutor. Whilst the activities of the Designated Safeguarding Lead can be delegated to trained deputies, the ultimate lead responsibility for safeguarding and Child Protection, as set out in this policy, remains with the Designated Safeguarding Lead. This responsibility will not be delegated, except in the case of long-term absence.

During term time, the DSL or deputy will always be available (during school hours) for staff in the setting to discuss any safeguarding concerns. Cover arrangements will be put in place should they need to be released from other duties to fulfil this role.

Out of hours, term time, safeguarding concerns about a child should be raised with social care without delay.
Please contact: For Lincolnshire County Council Children's safeguarding on 01522 782111 in office hours (8.00 am to 6.00 pm) and Emergency Duty Team 01522 782333 outside office hours.
For Cambridgeshire County Council Children's safeguarding on 034500455203 Out of hours 017330234724.
For Norfolk County Council Children's safeguarding on 01603 223473 Out of hours 03448008020

The appointment of a Designated Lead does not diminish the role of all staff members in being alert to signs of abuse and being aware of the procedures to be followed, including those cases where an accusation is made against a member of staff.

When our setting places a student with an alternative provider, the DSL will be responsible for safeguarding that student and will ensure that the provider meets the appropriate standards. Our setting will obtain written confirmation from the alternative provider that all appropriate checks have been carried out on individuals working at the establishment.

Our Designated Safeguarding Lead (DSL) as stated in KCSIE (2025) will ensure that they:
Manage referrals

- refer cases of suspected abuse to the local authority children's social care (Customer Service Centre) and in conjunction with the head tutor, the Lincolnshire Designated Officer (LADO) contactable on 0330 139797 or by email: lado@Lincolnshire.gov.uk or Cambridgeshire Designated Office (LADO) 0345 0455203 or by email: LADO@cambridgeshire.gov.uk for Child Protection concerns (all cases which involve staff/volunteers) or Norfolk County Council (LADO) by email: LADO@norfolk.gov.uk.
- Support staff who make referrals to Customer Service Centre.
- seek advice from Prevent Team regarding radicalisation concerns and refer cases to the Channel programme when necessary.
- Support staff who make referrals to the Channel programme when advised by Prevent team.

- support the head tutor to refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- Disclosure and Barring service (cases where a person is dismissed or left due to risk/harm to a child) and/or refer cases to the police where a crime may have been committed.
- Liaise with the head tutor and safeguarding team to inform them of issues of a safeguarding nature, especially ongoing enquires under section 47 of *the Children Act* 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and to advise on whether to refer to relevant agencies.
- The Designated Safeguarding Lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.
- NPCC- When to call the police should help Designated Safeguarding Leads understand when they should consider calling the police and what to expect when they do.

Work with others

- liaise with the head tutor to inform them of issues especially ongoing enquiries under section 47 of the *Children Act* 1989 and police investigations.
- As required, liaise with the "case manager" and the designated officer (LADO) for Child Protection concerns (all cases which concern a staff member or volunteer).
- liaise with staff on matters of safety and safeguarding, and when deciding whether to make a referral, by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and Child Protection issues that children, including children with a social worker, are experiencing, or have experienced, with tutors and education leadership staff. Their role could include ensuring that the education provision and their staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for this cohort. They help tutoring staff to identify the challenges that children in this group might face and the additional academic support and adjustments that could be made to best support these children.

Supporting the child and partnership with parents

Thrive Lincs Ltd recognises that the child's welfare is paramount, however good child protection and safeguarding practice and outcomes rely on a positive, open and honest working partnership with parents.

Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

We will provide a secure, caring, supportive and protective relationship for the child.

Children will be given a proper explanation (appropriate to age and understanding) of what

action is being taken on their behalf and why.

We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The Designated Safeguarding Lead will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of
supporting and protecting the child.

Undertake training

The DSL (and any deputies) will undertake formal safeguarding training at least every two years, and will receive regular updates at least annually.
They will also undertake Prevent awareness training.
In addition to the formal training, their knowledge and skills will be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role (this will be done by attending the termly LCC DSL Safeguarding Briefings and by attending appropriate Lincolnshire, Norfolk or Cambridgeshire Safeguarding Children Partnership inter-agency training and other relevant training and/or conference opportunities) so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- have a working knowledge of how local authorities conduct a Child Protection case conference and a Child Protection review conference and be able to attend and contribute to these effectively when required to do so.
- ensure all staff, especially new and part time staff, have access to and understand the education provisions Child Protection Policy and procedures.
- are alert to the specific needs of children in need, those with special educational needs and young carers.
- are able to keep detailed, accurate, secure written records of concerns and referrals.
- understand and support the education provision with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- obtain access to resources and attend any relevant or refresher training courses.
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the education provision may put in place to protect them.

Raise Awareness

- ensure that Thrive Lincs Child Protection and Safeguarding policies are known, understood and used appropriately.
- ensure that Thrive Lincs Child Protection and Safeguarding Policy is reviewed annually, the procedures and implementation are updated and reviewed regularly and work with governing bodies or proprietors regarding this.

• ensure the Child Protection and Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of our setting in this.
• link with the Lincolnshire, Norfolk and Cambridgeshire Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding. Availability.
• During term time the Designated Safeguarding Lead (or a deputy) should always be available (during school hours) for staff in the education provision to discuss any safeguarding concerns.
• It is a matter for individual educational providers and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
• If the DSL and Deputy DSL are not available then all safeguarding concerns are to be reported to the head tutor. If this is out of hours / term time then Children's Services are to be contacted and the police, if appropriate.

3.3 All staff and volunteers will:

• read and sign to say that they understand and will fully comply with our setting's policies and procedures.
• read and sign to say that they understand parts 1 and 5 and Annex A of '*Keeping Children Safe in Education '(2025).*
• be aware of the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral including the role they may be expected to play.
• be aware of what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with professionals.
• be aware of the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
• be aware of the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
• identify concerns as early as possible and provide help, to prevent concerns from escalating and identify children who may be in need of extra help or who are suffering or are likely to suffer significant harm.
• attend annual whole education provision safeguarding training and other appropriate training identified.
• provide a safe environment in which children can learn.
• be aware that they may be asked to support a Social Worker to take decisions about individual children.
• inform the Designated Safeguarding Lead of any concerns about a child immediately.
• inform the head tutor of any concerns regarding an adult within the setting at the earliest opportunity.

3.4 Whistleblowing

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Thrive Lincs Ltd is committed to ensuring that all staff feel safe to raise concerns about poor or unsafe practice in relation to safeguarding. We follow the Lincolnshire and Cambridgeshire County Council whistleblowing arrangements. Our setting has tailored the LCC's Whistleblowing arrangements to fit our provisions circumstances.

Concerns should normally be raised with the Head Tutor and DSL. Staff can also escalate concerns directly to the LADO and contact local authority on 0800 0853716 or whistleblowing@Lincolnshire.gov.uk in case a staff member feels they should report to someone outside the school. Alternative education provisions are responsible for agreeing and establishing their own whistleblowing procedures.

All staff and contractors should be aware of the NSPCC Whistleblowing Advice Line for Professionals (0800 028 0285) and the online helpline with is: NSPCC Reporting abuse advice and be aware that they can use this line if:

- The school does not have clear safeguarding procedures to follow.
- They believe their concerns will not be dealt with properly or may be covered up.
- They have raised a concern, but it has not been acted upon.
- They are worried about being treated unfairly.

They should be aware that they can call about an incident that happened in the past, is happening now or they believe may happen in the future.

SECTION 4: CHILD PROTECTION PROCEDURES

4.1 Definitions: ('*Working Together 2025* and '*Keeping Children Safe in Education 2025*)

A child: any person under the age of 18 years.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

Child Protection: is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Harm: means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.

Development: means physical, intellectual, emotional, social or behavioural development.

Health: includes physical and mental health; maltreatment includes sexual abuse and other forms of ill-treatment which are not physical.

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sharing of nudes or semi-nudes: Also known as sexting or youth produced imagery is where children share nude or semi-nude images, videos or live streams.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding Policy

Bullying (physical, name calling, homophobic etc.) Bullying is hurtful or unkind behaviour which is deliberate and repeated. Bullying can be carried out by an individual or a group of people towards another individual or group, where the bully or bullies hold more power than those being bullied. In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once. Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

Cyber bullying: Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter, to harass, threaten or intimidate someone for the same reasons as stated above. It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the *Communications Act 2003*, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use/taking/distribution of indecent images of young people under the age of 18, then this is also, a criminal offence under the Sexual Offences Act 2003. While offering the necessary support young people may require in these instances, the school must ask the police to investigate any such situation.

Initiation/Hazing: Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school or sports team. There is a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Prejudiced Behaviour: The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds,

gender, home life, for example, in relation to issues of care, parental occupation, poverty and social class, or sexual identity.

Teenage relationship abuse: Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

All staff follow the education provision Child Protection procedures which are consistent with *'Working Together to Safeguard Children 2025', Keeping Children Safe in Education (2025)* and the Lincolnshire and Cambridgeshire Safeguarding Children Partnership guidance.
Tutors and other adults in the setting are well placed to observe any physical, emotional or behavioural signs, which indicate that a child may be suffering significant harm. The relationships between staff, students, parents and the public, which foster respect, confidence and trust, can lead to disclosures of abuse, and/or our setting staff being alerted to concerns.
All staff will also have an awareness of specific safeguarding issues, in particular Domestic Abuse, Child Exploitation (CE), Radicalisation and the Prevent Duty, Female Genital Mutilation (FGM), Attendance and Children Missing from Education (CME) and Contextual Safeguarding. Staff will also be aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger.
All staff will also be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff are clear as to the education provisions policy and procedures with regards to child-on-child abuse.
It is not the responsibility of the education provisions staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All members of staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of students will be recorded and discussed with the Designated Safeguarding Lead (or the deputy DSL in the absence of the DSL) prior to any discussion with parents.
If children are placed in any form of Alternative Provision for any part of their day, this setting will seek reassurance that the same Child Protection procedures will be followed and that any concerns will likewise be reported to our Designated Safeguarding Lead and their counterpart within the alternative provision.

4.2 Concerns that staff must act on immediately and report:

- Any suspicion that a child is injured, marked, or bruised in a way that is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours that give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play).
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.

- Any concerns that a child is presenting signs or symptoms of abuse or neglect.
- Any significant changes in a child's presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.
- Any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present).
- Any potential indicators of child exploitation.
- Any potential indicators of FGM.
- Any potential indicators of radicalisation.
- Any potential indicators of living in a household with domestic abuse.

4.3 Responding to discloser

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead in order that they can make an informed decision of what to do next.

The Designated Safeguarding Lead will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Child Protection processes will operate with the best interests of the child at their core.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm.
- allow them to take time to talk and do not ask leading questions.
- try to ensure that the person disclosing does not have to speak to another member our settings staff.
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- explain what will happen next and that you will have to pass the information on. Do not promise to keep it a secret.
- clarify the information.
- try to keep questions to a minimum and of an 'open 'nature e.g. using TED technique –**' T**ell me, **explain** to me, **D**escribe to me….'
- stay calm and do not show signs of shock, horror or surprise.
- Not express feelings or judgements regarding any person alleged to have harmed the child.
- explain sensitively to the person that they have a responsibility to refer the information to the Designated Safeguarding Lead. Children need to know that staff may not be able to uphold confidentiality where they are concerns about their safety or someone else's.
- reassure and support the person as far as possible.
- explain that only those who 'need to know 'will be told.
- explain what will happen next and who will be involved as appropriate.
- record details including date, what the child has said, in the child's words on a 'Record of Concern 'form and pass to DSL and record any visible signs, injuries or bruises on a Body Map.
- record the context and content of their involvement, and will distinguish between fact, opinion and hearsay.

4.4 Action by the Designated Safeguarding Lead (or deputy DSL in their absence)

Following any information raising concern, the Designated Safeguarding Lead will consider:

- Any urgent medical needs of the child.
- Whether the child is subject to a Child Protection plan.
- discussing the matter with other agencies involved with the family.
- consulting with appropriate persons e.g. Duty and Advice Team.
- the child's wishes.

Then decide:

- to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk.
- whether to make a Child Protection referral to Children's Social Care-Duty and Advice Team because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately.

OR

- Not to make a referral at this stage.
- If further monitoring is necessary.
- If it would be appropriate to undertake an assessment (e.g. Early Help Assessment - EHA) and/or make a referral to Children's Social Care- Customer Service Centre. All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to Customer Service Centre will be followed up in writing and these referrals will always be kept on file irrespective of the outcome.

4.5 Action following a Child Protection referral

The Designated Safeguarding Lead or other appropriate member of staff will:

- make regular contact with the social worker involved to stay informed.
- Wherever possible, contribute to the strategy discussion.
- provide a report for, attend and contribute to any subsequent Child Protection conference.
- If the child or children are made the subject of a Child Protection plan, contribute to the Child Protection plan and attend core group meetings and review conferences.
- Where possible, share all reports with parents prior to meetings.
- Where in disagreement with a decision and concerns still remain with the child firstly:
  - o Talk in the first instance to the DSL.
  - o Check the referral included all the relevant information and clearly documented the concerns about the child.
  - o Finally, follow the professional resolution and escalation protocol shown on the LCSB website.
- where a child subject to a Child Protection plan moves from the education provision or goes missing, immediately inform Children's Social Care Customer Service Centre.

4.6 Recording and monitoring

Accurate records will be made as soon as practicable and will clearly distinguish between

observation, fact, opinion and hypothesis. All records will state who is providing the information, the date and time, information will be recorded in the child's words where possible and a note made of the location and description of any injuries seen, if this is a paper record than this should be signed. Photographs of injuries must not be taken.

The DSL ensures that the method for other members of staff or volunteers passing on concerns or information is always adhered to as consistency is paramount in ensuring that nothing gets missed.

All records of concerns are followed up and clearly show what action is being taken as a result of the concern and the outcomes of this action.

All documents will be retained in a 'Child Protection file', separate from the child's education provision file. This will be an electronic file e.g. using CPOMS (Child Protection Online Management System) and be stored securely with appropriate levels of limited access.

4.7 Equality Statement

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

We give special consideration to children who:

- have special educational needs (SEN), disabilities, or health conditions.
- are young carers.
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- have English as an additional language.
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- are asylum seekers.
- are at risk due to either their own or a family member's mental health needs.
- are looked after or previously looked after.
- are missing from education.
- whose parent/carer has expressed an intention to remove them from school to be home educated

SECTION 5 SAFEGUARDING ISSUES

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to behaviours such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

5.1 Children and the Court System

Children are sometimes required to give evidence in criminal courts. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds.

5.2 Children Missing from Education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

- are at risk of harm or neglect.
- are at risk of forced marriage or FGM.
- come from Gypsy, Roma, or Traveller families.
- come from the families of service personnel.
- go missing or run away from home or care.
- are supervised by the youth justice system.
- cease to attend a school.
- come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the education provider without a new education provider being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

The Education and Inspectors Act 2006 places a duty on Local Authorities, schools and education providers to establish the identities of children who are missing from education in their area. If, after 2 or 3 days, a student or their parent cannot be contacted by the education provider, the Deputy DSL will visit the family. If this visit fails to provide any answers, the missing student will be reported to the Child Missing Education Officer via Social Care. Information will be shared with the relevant NCC education key worker – TES or VS as applicable.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and

neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in the future. Staff should be aware of their school's unauthorised absence and children missing from education procedures.

5.3 Children with Family Members in Prison

Our education provider understands that children with a parent(s) in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. They may require specific services and support. Families and children of people in prison will be seen as families first and school will work to ensure their needs are appropriately met. This will include providing support to ensure the voice of the child is considered when seeking contact with a family member in prison. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

5.4 Child Sexual Exploitation (CSE)

Thrive Lincs Ltd is aware that Child Sexual Exploitation (CSE) is a form of child sexual abuse. 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 the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from Child Sexual Exploitation 2017).

Staff have been made aware of some of the key indicators of CSE by training provided by DSL and external agencies. In addition, Thrive Lincs Ltd appreciates that it has a role to play in the prevention of CSE within its safeguarding curriculum e.g. Healthy Relationships, Sex and Relationships Education.

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

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

- having an older boyfriend or girlfriend.
- suffering from sexually transmitted infections or becoming pregnant.

If staff identify children for whom CSE may be a concern, they will apply the usual referral process and Child Protection procedures and pass this information to the Designated

Safeguarding Lead (DSL). The DSL can then refer cases where relevant to Lincolnshire, Norfolk or Cambridgeshire Customer Services Team. Thrive Lincs Ltd also appreciates that they have a role to play in sharing soft intelligence relevant to perpetrators of CSE, and therefore if such information should come to light within the setting, the DSL will share this appropriately with the police on Tel:
101.

Signs to look out for:

- going missing for periods of time or regularly coming home late.
- Regularly missing education or not taking part in education.
- appearing with unexplained gifts or new possessions.
- associating with other young people involved in exploitation.
- having older boyfriends or girlfriends.
- suffering from sexually transmitted infections.
- Mood swings or changes in emotional wellbeing.
- Drug and alcohol misuse.
- displaying inappropriate sexualised behaviour. It is important to note that some young people who are being sexually exploited do not exhibit external signs of this abuse.

This work is delivered in line with the Relationships, Sex and Health Education (England) Regulations 2019.

5.5 Child Criminal Exploitation (CCE):
Child criminal exploitation (CCE) is 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.

CCE is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.

- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

COUNTY LINES

Thrive Lincs Ltd recognise that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Thrive Lincs Ltd will consider whether a referral to the National Referral Mechanism (NRM) should be undertaken in order to safeguard that child and/or other children.

5.6 Domestic Abuse and Operation Encompass

This section reflects the Domestic Abuse Act 2021, which recognises children as victims of domestic abuse in their own right. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Thrive Lincs Ltd understands that the cross-government definition of domestic violence and abuse is:

- any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.
- The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.
- controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. If staff identify children for whom Domestic Abuse may be a concern, they should apply the usual referral process and Child Protection procedures and pass this information to the Designated Safeguarding Lead (DSL). The DSL can then refer cases where relevant to Lincolnshire or Cambridgeshire Customer Services. Where DV Notifications are
received from the Multi-Agency Risk Assessment Conference (MARAC), this information will be added to a child's chronology and Child Protection record to ensure that appropriate support can be provided where necessary. A coding system will be in place.
Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in
confidence, 24 hours a day on 0808 2000 247.

5.7 Homelessness

Being homeless or at risk of homeless presents a real risk to a child's welfare. The DSL (and

deputy) should be aware of contact details and referral routes into the Lincolnshire or Cambridgeshire Housing Authority so they can raise /progress concerns at the earliest opportunity. Homeless Reduction Act Factsheets summarise the new duties that focus on early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. If homelessness occurs for 16 and 17 year olds and is not family based, the DSL will use the referrals process to children's services as outlined in this document.

5.8 'Honour-based' abuse (including Female Genital Mutilation and Forced Marriage)
So called honour-based abuse (HBA) is a term used to describe violence committed within the context of the extended family which are motivated by a perceived need to restore standing within the community, which is presumed to have been lost through the behaviour of the victim. Most victims of HBA are women or girls, although men may also be at risk. These crimes could be committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Women and girls may lose honour through expressions of autonomy, particularly if this autonomy occurs within the area of sexuality. Men may be targeted either by the family of a woman who they are believed to have 'dishonoured', in which case both parties may be at risk, or by their own family if they are believed to be homosexual.

There are several common triggers for HBA: refusing an arranged marriage; having a relationship outside the approved group; loss of virginity; pregnancy; spending time without the supervision of a family member. However, as some families may resolve to abuse or kill a member on what would appear to be very trivial grounds, it is important to take fears of HBA seriously, even when it seems unlikely. Victims of HBA are more likely to underestimate the risks to their safety than overstate them and even if the 'offence 'seems trivial to you, this does not mean it is trivial to their family.

As HBA is a collective crime, the potential assailants and their networking capacity multiply the risk. It is not unknown for the family to pay a hit man or agency to deal with a fugitive from the family. Families that are widely spread across the country may make many areas unsafe for people at risk of HBA. Families may deploy their professional networks to locate an individual by, for example, circulating photographs within a taxi service, or finding a relative with access to official records to gain confidential information. Make the DSL aware immediately, if you suspect a young person may be at risk of HBA.

If staff are concerned regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead or deputy.

5.9 Female Genital Mutilation/FGM
Thrive Lincs Ltd understands that Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Staff know that FGM is illegal in the UK and a form of child abuse with long lasting harmful consequences.

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

organs".

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

Any Tutor who either:

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

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

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

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

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

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

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

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

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/student already being known to social services in relation to other safeguarding issues.
- A girl:
  - having difficulty walking, sitting or standing, or looking uncomfortable.
  - finding it hard to sit still for long periods of time (where this was not a problem previously).
  - spending longer than normal in the bathroom or toilet due to difficulties urinating.
  - having frequent urinary, menstrual or stomach problems.

- avoiding physical exercise or missing PE.
- being repeatedly absent from education, or absent for a prolonged period.
- demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- being reluctant to undergo any medical examinations.
- asking for help, but not being explicit about the problem.

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- a family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
    - having a mother, older sibling or cousin who has undergone FGM.
    - having limited level of integration within UK society.
    - confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
    - talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
    - requesting help from a tutor or another adult because she is aware or suspects that she is at immediate risk of FGM.
    - talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
    - being unexpectedly absent from education.
    - having sections missing from her 'red book '(child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

FGM MANDATORY REPORTING DUTY FOR TEACHERS

Thrive Lincs Ltd is aware that Section 5B of the *Female Genital Mutilation Act 2003* (as inserted by section 74 of the *Serious Crime Act 2015*), places a statutory duty upon teachers (and those employed or engaged to carry out teaching work) to report to the police where they discover that FGM appears to have been carried out on a girl under 18 years of age. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers/tutors to see visual evidence, and they should not be examining students or students. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers/tutors must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher/tutor has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's

social care as appropriate. The duty does not apply in relation to at risk or suspected cases. In these cases, teachers/tutors should follow usual safeguarding procedures reporting to DSL.

5.10 Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

Forcing a person into marriage is a crime. 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.

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

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

The DSL will:

- speak to the student about the concerns in a secure and private place.
- activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk. Refer the student to a Deputy DSL, pastoral tutor, learning mentor as appropriate. Staff at Thrive Lincs Ltd understand that likewise this is a potential Safeguarding issue and thus they would pass on concerns by applying the usual referral process and Child Protection procedures and pass this information to the Designated Safeguarding Lead (DSL). The Forced Marriage Unit may be contacted on Tel; 020 7008 0151 for advice or information.

5.11 Preventing Radicalisation, The Prevent Duty and Channel

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- endangers or causes serious violence to a person/people.
- causes serious damage to property.

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

Education providers have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our setting being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in students 'behaviour. The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

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

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

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

If a child is not suffering or likely to suffer from harm, or in immediate danger, where

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to.

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

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

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist-related Children are vulnerable to extremist, terrorism, ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection and report concerns to the DSL.
- Under section 26 of the *Counter-Terrorism and Security Act 2015*, Thrive Lincs Ltd is aware that we must have due regard to the need to prevent people from being drawn into terrorism, and that this is known as the Prevent Duty.
- In order to fulfil the Prevent Duty, staff have received information/training to help them to identify children who may be vulnerable to radicalisation, and the setting is committed to accessing further training to ensure that all staff are up to date and aware of this duty. If staff identify children for whom this may be a concern, they should apply the usual referral process and Child Protection procedures and pass this information to the Designated Safeguarding Lead (DSL).
- Prevent duty guidance: for England and Wales – see page 57-76 which contains specific information for education providers.
- The Designated Safeguarding Lead will contact the Prevent Coordinator should there be concerns about a child or family linked to potential radicalisation or extremism. The Prevent Coordinator will then assist the DSL regarding whether a referral is appropriate and whether this child or family will need to be referred to the Channel Panel Channel guidance.
- Thrive Lincs Ltd will also incorporate the promotion of fundamental British Values into the Safeguarding Curriculum and/or PSHE in order to help build students' resilience and enable them to challenge extremist views. Our setting will provide a safe space in which children and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- Radicalisation will also be considered within current Online Safety policies, procedures and curriculum in terms of having suitable filtering and monitoring in

place and also raising awareness with staff, parents and children about the increased risk of online radicalisation, through the use of the internet, social media and gaming.

• For more information about Prevent in Lincolnshire or Cambridgeshire, including referral forms and project
examples, please read the Prevent Duty Guidance for Lincolnshire for Schools and registered childcare providers September 2018, available within the Safeguarding folder on Perspective light and at Lincolnshire Safeguarding Children Partnership.

5.12 Child on Child Abuse

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

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

Most cases of students hurting other students will be dealt with under our settings behaviour policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put students in the setting at risk.
- Is violent.
- Involves students being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, 'upskirting 'or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of our setting and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi nudes images and/or

videos (also known as, sexting or youth produced sexual imagery).

‘ •Upskirting’, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

• Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element) If a student makes an allegation of abuse against another student:

• You must record the allegation and tell the DSL, but do not investigate it.

• The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

• The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

• The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they
will follow the procedures set out in section 7 of this policy, as appropriate.

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

To achieve this, we will:

• challenge any form of derogatory or sexualised language or inappropriate behaviour
between peers, including requesting or sending sexual images.

• be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.

• ensure our curriculum helps to educate students about appropriate behaviour and consent.

• ensure students are able to easily and confidently report abuse using our reporting systems.

• ensure staff reassure victims that they are being taken seriously.

• ensure staff are trained to understand.

  o how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.

  o that even if there are no reports of child-on-child abuse in setting, it does not
  mean it is not happening – staff should maintain an attitude of “it could happen here”.

  o that if they have any concerns about a child’s welfare, they should act on

them immediately rather than wait to be told, and that victims may not always
make a direct report.

For example:

- Children can show signs or act in ways they hope adults will notice and react to.
- A friend may make a report.
- A member of staff may overhear a conversation.
- A child's behaviour might indicate that something is wrong.
    - that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
    - that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
    - the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
    - that they should speak to the DSL if they have any concerns.

At Thrive Lincs Ltd, we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and well-being. Allegations of child-on-child abuse will be investigated and dealt with in accordance with this policy and all other relevant policies.

Children and young people may harm one another in a number of ways which would be classified as child-on-child abuse. The purpose of this policy is to explore the many forms of child-on-child abuse and include a planned and supportive response to the issues. At Thrive Lincs Ltd, we have the following policies in place that should be read in conjunction with this policy:

- Anti-bullying policy.
- Code of Conduct.
- Learning Policy.

All staff should be clear as to the school's policy and procedures to child-on-child abuse.

5.13 Serious Violence

This policy reflects the Serious Violence Duty under the Police, Crime, Sentencing and Courts Act 2022. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from education, 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, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal network or gangs.

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

- increased absence from education.
- change in friendships or relationships with older individuals or groups; • significant decline in performance
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)) Risk factors which increase the likelihood of involvement in serious violence include:
- being male.
- having been frequently absent or permanently excluded from education.
- having experienced child maltreatment.
- having been involved in offending, such as theft or robbery.

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

It is also important that we are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence in this policy,
we do so in the context of child-on-child sexual violence. For the purpose of this policy, when referring to sexual violence we are referring to sexual offences under the *Sexual Offences Act 2003* as described below:

Rape: A person (A) commits an offence of rape if he intentionally penetrates 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 s/he intentionally penetrates the
vagina or anus of another person (B) with a part of her/his 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 s/he 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.

What is consent? Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. All staff should be aware of the associated risks and understand the measures in place to manage

these.

5.14 Sexual Violence and Sexual Harassment

Victims and alleged perpetrators
There are many different ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. It is important that we recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or world want to be described in this way.

For the purpose of this policy, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature 'that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual "jokes" or taunting; • physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature.
- Online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It is important that we consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Staff are aware of sexual violence and sexual harassment and that children can, and sometimes do, abuse their peers in this way. Sexual violence refers to Rape, Assault by Penetration and Sexual Assault as described in the *Sexual Offences Act 2003*. Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Staff understand that when we reference sexual harassment we do so in a context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. '*Keeping Children Safe in Education 2025* section 5 'has guidance.

Neither is acceptable nor will not be tolerated by the setting. Education providers take all such reports seriously and they will receive the same high standard of care that any other safeguarding concern receives. A multi-agency approach will be undertaken when

responding to all such complaints; however, the setting will always take immediate action to protect children regardless of the actions of any other agency. These actions may include an immediate risk assessment in respect of the needs of the child victim and will address any risks identified to any child in respect to an alleged perpetrator of sexual violence or sexual harassment to ensure children are protected from harm. Any risk assessment will be fluid and may change to reflect any developments during the management of the case. All such reports will be managed by the Designated Safeguarding Lead. There are a number of options the setting may consider in respect of the management of a report of sexual violence or sexual harassment between children and each case will receive an appropriate bespoke response once all the facts are known. Irrespective of any potential criminal outcome, the setting has a duty to safeguard all children and may deal with any such report on a balance of probability basis when considering the outcomes for children involved. Should an outcome involve a move to an alternative provision for any child then full information sharing of the case will be undertaken with the Designated Safeguarding Lead professional in that setting.

Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs. and communication barriers and difficulties overcoming these barriers.
- Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

HARMFUL SEXUAL BEHAVIOURS

Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected too inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviours". Advice on signs, indicators and effects of harmful sexual behaviours is available here: NSPCC: Harmful sexual behaviour: signs-indicators-effects. The term has been widely adopted in Child Protection and is used in this policy. Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two. Harmful sexual behaviours should be considered in a Child Protection context.

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years 'difference in age or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Detailed advice on harmful sexual behaviours is available from the specialist sexual violence

sector: contact Rape Crisis or the Survivors Trust for details of the nearest centre. Also, see NSPCC: Harmful sexual behaviour, and NICE guidance for advice on, amongst other things, developing interventions; working with families and carers and multi-agency working.

Children displaying harmful sexual behaviours have often experienced their own abuse and trauma. It is important that they are offered appropriate support. As an education provider we have a statutory duty to safeguard and promote the welfare of the children in this setting. As part of this duty, we are required to have regard to guidance issued by the Secretary of State.

If at any time a member of staff has concerns regarding any such behaviours, they should report them to the DSL immediately (see section 5).

5.15 'Upskirting'

The Voyeurism (Offences) Act, which is commonly known as the *Upskirting Act*, came into force on 12 April 2019. 'Upskirting' typically involves taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Anyone of any gender, can be a victim. Staff should always act in the best interests of a child.

5.16 Youth Produced Sexual Imagery

Where there is a disclosure or the school becomes aware that a child may have been involved in sending 'youth produced sexual imagery 'which is sometimes referred to as ' sexting 'it will refer to the guidance in the document 'Sharing nudes and semi-nudes: advice for educational settings working with children and young people' published by the *UK Council for Child Internet Safety (2024)*. Staff understand that when an incident involving youth produced sexual
imagery comes to their attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate provision staff.
- There should be subsequent interviews with the young people involved (if appropriate).
- parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- at any point in the process if there is a concern a young person has been harmed or
is at risk of harm a referral should be made to children's social care and/or the police immediately. We will also refer to: The DfE Searching, Screening and Confiscation Guidance 2022.

5.17 Contextual Safeguarding

Thrive Lincs Ltd recognises that safeguarding incidents and/or behaviours can be associated with factors outside the setting and/or can occur between children outside the setting. All staff, but especially the Designated Safeguarding Lead will consider the context within which such incidents and/or behaviours occur. This is known as contextual

safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. The setting will provide as much information as possible to children's social care as part of any referral undertaken.

5.18 Carrying Knives/offensive weapons and gang culture

Bringing and carrying a knife/offensive weapon into our setting is a criminal offence and immediate action will be taken by calling the police and informing the parents. If a member of staff suspects a student/student being involved in gang culture, this is a safeguarding concern and will require a discussion with the Designated Safeguarding Lead who will seek advice from agencies and professionals including reference to the safeguarding procedures as outlined by the local authority. The student may be an exploited child and victim to which the setting will offer support.

5.19 Children who may require Early Help

Early Help is the term used to describe arrangements and services that identify the need for help for children and families as soon as the problems start to emerge, or when there is a strong likelihood that problems will emerge in the future. *Working Together to Safeguard Children (2025)* identifies the critical features of effective Early Help as:

A multi-disciplinary approach that brings a range of:

- Practice that empowers families and helps them to develop the capacity to resolve their own professional skills and expertise through a "Team around the Child" approach.
- A relationship with a trusted lead professional who can engage with the child and their family and coordinate the support needed from other agencies.
- A holistic approach that addresses the children's needs in the wider family context.
- Simple, streamlined referral and assessment process.
- Early Help in Lincolnshire includes both the TAC and ESCO process. Signs of Safety is embedded throughout. ESCO is similar to the TAC process but specifically supports the care coordination of Children with Disabilities (CWD) Further information can be seen at www.Lincolnshire.gov.uk/ All forms and guidance for Early Help including Signs of Safety, TAC Handbook, TAC Consultants contact details etc.

All Staff (and volunteers) working within the setting are aware safeguarding is not just about protecting children from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- Children's health and safety and well-being, including their mental health.
- meeting the needs of children who have special educational needs and/or disabilities.
- The use of reasonable force.
- meeting the needs of children with medical conditions.
- providing first aid.
- Educational visits.
- Intimate care and emotional well-being.
- Online safety and associated issues.

- Appropriate arrangements to ensure children's security taking into account the local context.
- Young carers.
- Privately fostered children.
- Children who have returned home to their family from care.
- Children showing signs of engaging in anti-social or criminal behaviour.
- Family circumstances presenting challenges for the child, such as substance abuse, adult mental health, domestic violence.
- Early signs of abuse and/or neglect.
- Signs of displaying behaviour or views that are considered to be extreme.
- Children misusing drugs or alcohol themselves.
- Not attending school or are at risk of exclusion from school.
- Frequently going missing/goes missing from care or from home.
- is at risk of modern slavery, trafficking, exploitation, radicalised.
- Not in education, training or employment after the age of 16 (NEET).
- Unborn babies – LSCP pre-birth protocol.

When using reasonable force, this is in line with national guidelines and takes into account individual student needs and risk management/care plans, and in particular with regard to SEND, Lincolnshire SEND offer.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

WHAT IS TEAM AROUND THE CHILD (TAC)?

TAC is a shared assessment and planning framework which is in use by a variety of agencies across the county and is employed in similar format throughout the country. It aims to help with the early identification of additional needs of children and young people and promote a coordinated multi agency response to meet them. TAC can be used to support children and young people between 0– 19 years, including unborn babies and can also be used with consent up to the age of 24 where a young person has a learning difficulty or disability. There are four main stages in setting up a TAC:

1. Early identification of needs.
2. Assessing strengths and needs in a consistent and methodical framework.
3. Developing and delivering an integrated service.
4. Reviewing and refining the support arrangements.

Early Help Consultants provide support, advice and guidance to lead professionals on existing TAC Cases. They will use Signs of Safety methodology to map and/or quality assure cases in order to secure improved outcomes for children, young people and their families. Contact via your local TAC Coordinator in your locality.

TAC Administrators provide administrative support, maintain records, monitor processes, and can signpost professionals to local services.

Further Support for Schools and Academies In addition to the support outlined above, and academies can request case supervision for all TAC cases where the Lead Professional is employed in an educational setting. For these cases administrative support can also be requested in the form of arranging meetings and typing of assessments and plans.

The Designated Safeguarding Lead acts as the focal point for all matters concerning child protection and safeguarding children and young people. One of the primary tasks is to act as the contact between education provider, the family and other agencies. Incidents of possible child abuse obviously need to be handled with sensitivity and confidentiality consistent with the multi-disciplinary approach. If there is any cause for concern whatsoever it is vital that information is passed to the Designated Safeguarding Lead immediately. In the event, following statutory investigation, of concerns proving to be unfounded, staff should not reproach themselves for having raised the issue. In cases of this nature, it is always better to be safe than sorry.

INFORMATION SHARING

Working with the latest available guidance (currently, *Keeping Children Safe in Education 2025*), the setting will share all necessary intelligence with other agencies in order to safeguard those missing or likely to go missing from educational settings, including other schools and other local authorities.

In cases where mid-year transfers involve students with a Child Protection background, the Designated Safeguarding Lead will consider whether it is appropriate to share information with the new education provider, thus providing continued support for all vulnerable students regardless of placement.

5.20 Children with Special Educational Needs and/or Disabilities

Lincolnshire SEND offer is available for every child and family in Lincolnshire. Special consideration
should be given to safeguarding and protecting children who may have additional vulnerabilities:

- additional barriers can exist to the recognition of abuse and neglect which can include assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Vulnerable children can disproportionately be impacted by things like bullying and abuse, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.
- seeing a disability first and abuse second.

These additional challenges are addressed through a high level of pastoral care and us communication and interaction with our young people. These communication tools may include Makaton, communication in print and Colourful Semantics to ensure the child's voice is heard despite their additional needs.

5.21 Looked After Children

At Thrive Lincs Ltd, designated safeguarding lead is responsible for looked after children. This group is extremely vulnerable. The most common reason for children to become looked after is as a result of abuse and/or neglect and the school is aware of the need to monitor

the welfare and ensure the support of children in this category.

The designated safeguarding lead has details of the legal status of each individual looked after child's care arrangements and the nature of the contact arrangements with birth parents or those with parental responsibility. The designated safeguarding lead will also know the levels of authority delegated to the carer by the authority looking after him/her.

All staff recognise that looked after children and care leavers are more vulnerable than other children, often having poorer educational outcomes; therefore, ensuring their wellbeing, safety and welfare, helping them to reach their potential which includes the looked after child who is moving on. The setting will also ensure that care leavers are supported with pathways including liaison with the local authority where a personal advisor will be appointed and a full working relationship is maintained.

5.22 Online Safety

IT POLICIES Thrive Lincs Ltd will ensure that children are safe from online terrorist and extremist material, typically via appropriate levels of filtering.

Thrive Lincs require students and staff to abide by acceptable user policies which make clear that accessing such sites is unacceptable. Using our settings equipment to send terrorist publications to others would be a criminal offence.

ONLINE SAFETY AND SAFEGUARDING EDUCATION

The setting ensures that appropriate filters are put in place to secure our students 'safety whilst they are in our setting or using our facilities. As increasingly students work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. Our designated safeguarding lead ensures appropriate filters and monitoring systems are in place. Additional information on this area is provided in Annex C of *Keeping Children Safe in Education (2025).*

Our curriculum ensures that online safety is included in relevant lessons. Students are taught about safeguarding: online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This includes covering relevant issues through personal, social, health and economic education (PSHE), tutorials and sex and relationship education.

Although appropriate blocking and filtering is essential, it relies on settings staff to ensure that "over blocking" does not lead to unreasonable restrictions.

This policy operates in line with the Online Safety Act 2023 and Keeping Children Safe in Education 2025.

5.23 Pre-Birth Protocol

Section 11 of the *Children Act 2004* requires agencies to have in place mechanisms to ensure that they are able to safeguard and promote the welfare of children. All practitioners whether adult or children services, have a responsibility to protect and safeguard children and work collaboratively with Children's Services and other childcare professionals in

contributing to assessments and interventions. Therefore, the professional who is first made aware of the pregnancy should initiate the prebirth protocol and complete an Early Help Assessment or make a referral for unborn to Social Care. A young person of statutory education age is entitled to 18 weeks of maternity leave. Either side of this period there is an expectation that the young person continues to attend school or alternative provision. The educational establishment is required to make all reasonable adjustments to allow the young person to have appropriate access to the curriculum whilst they attend the establishment including timetable and learning environment adjustments. It is important that the provision participates in the Team Around the Child (see Team Around the Child Supporting Documentation) in order for them to fully support the continued education of the young parent. Education establishments should have a clear strategy for engaging with the young person while they are away from the provision so as to limit the disruption to their education and make appropriate arrangements that work for the young person and educational establishment. Where there is robust medical evidence that indicates that the young person is unfit to attend, the educational establishment can make a referral to the pupil reintegration team.

WIDER ISSUES TO CONSIDER

These are some further areas to consider in implementing the prevent agenda:

- Settings are required to promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.
- Curriculum including a balanced Religious Education, Personal Social and Health Education etc. EMTET is the Ethnic Minority and Traveller Education Team who can support settings by working with individuals who are victims of racism or are perpetrators of racism or have racist views. In addition, they can signpost settings to other organisations which will be able to support with other similar issues.

Staff are aware of, and follow, the DfE guidance Teaching online safety in school 2019 to ensure our students understand how to stay safe and behave online as part of existing curriculum requirements. We also make use of UKCIS Education for a connected world framework. Staff are aware that safeguarding also relates to broader aspects of care and education including children's health and safety and well-being, including their mental health.

5.24 Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their Child Protection Policy and speaking to the Designated Safeguarding Lead or a deputy.

5.25 Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk. Staff should be aware of the importance of:

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

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

SECTION 6: PROVIDING A SAFE AND SUPPORTIVE ENVIRONMENT

6.1 Safer Recruitment and Selection (please download guidance on DBS, Vetting and Barring – see links in *Keeping Children Safe in Education 2025*)

The setting pays full regard to DfE guidance *'Keeping Children Safe in Education 2025'.*

Safeguarding Policy

We ensure that all appropriate measures are applied in relation to everyone who works in our setting who is likely to be perceived by the children as a safe and trustworthy adult including volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity academic and vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and all relevant safer recruitment checks, e.g.

Disclosure and Barring Service and right to work in the UK checks etc. In line with statutory changes, underpinned by regulations, our setting will maintain a Single Central Record (SCR).
This document will cover all staff (including supply staff, and teacher trainees on salaried routes) who work at our setting.

The information that must be recorded in respect of all staff members mentioned above is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained apply:

- An identity check.
- A barred list check.
- An enhanced Disclosure and Barring Service (DBS) check.
- A prohibition from teaching check.
- A section 128 check (for management positions as set out in paragraph 99 for independent schools, including free schools and academies).
- Further checks on people who have lived or worked outside the UK: this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions.
- A check of professional qualifications.
- A check to establish the person's right to work in the United Kingdom.

For supply staff, our setting will include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received. Where checks are carried out on volunteers, our setting will record this on the single central record. Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity with a child.

6.2 Home-stays (Exchange Visits)

Where children from overseas are staying with UK parents as part of an exchange organised by our setting, those parents will be deemed to be in 'Regulated Activity 'for the duration of the stay and as such will require to submit an enhanced DBS check including barring check. As a volunteer, all checks will be processed free of charge by the DBS. Where additional people in the host family are aged over 16 (i.e. elder siblings), our setting will consider on a case by case risk assessment basis whether such checks are necessary.

6.3 Safe Working Practice

Safeguarding Policy

Our setting will comply with the current Guidance for Safer Working Practice for Adults who work with children and young people in education settings. Our setting pays full regard to DfE guidance *Keeping Children Safe in Education 2025* and with reference to the 'Position of Trust 'offence (Sexual Offences Act 2003). We ensure that all appropriate measures are applied in relation to everyone who works in our setting who is likely to be perceived by the children as a safe and trustworthy adult. We do this by means of the following:

1. Operating safer recruitment practices including appropriate Enhanced Disclosure and Barring Service (DBS) and reference checks, verifying identity academic and vocational qualifications, obtaining professional references, checking previous employment history (including any additional checks thought appropriate for staff who have lived or worked outside the UK) and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checking the Children's List and the existence of any teacher/tutor prohibition orders (checked via the 'Teacher Services' system) and the right to work in England checks in accordance with DBS and Department for Education procedures. Individuals who have lived or worked outside the UK must undergo the same checks as all other staff our setting.

   In February 2015, the DfE issued additional guidance about disqualification by association 'Disqualification Under the *Childcare Act 2006*' which applies to those staff employed and/or provide childcare in either the early years (birth until end of reception age) or later years (children under the age of 8). Education providers will need to ask those staff in scope to complete a disqualification declaration. Upon return the setting should contact their HR adviser and LADO where a positive declaration has been made.
2. Ensuring that staff and volunteers adhere to a published code of conduct and other professional standards at all times. Staff are aware of social media/ on-line conduct.
3. Ensuring any disciplinary proceedings against staff related to Child Protection matters are concluded in full in accordance with Government guidance *Keeping Children Safe in Education 2025*, LADO procedures and guidance.
4. Ensuring that all staff and other adults on site are aware of the need for maintaining appropriate and professional boundaries in their relationship with students and parents, following the Code of Conduct.
5. Establishing adequate risk assessments are in place including for extended provisions, volunteer and holiday activities.
6. Supporting staff confidence to report misconduct.

At least one member of every recruitment panel has completed Safer Recruitment training within the last 5 years.

Safe working practice ensures that students are safe and that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Work in an open and transparent way.
- work with other colleagues where possible in situations open to question.
- discuss and/or take advice from our settings management over any incident which

may give rise to concern; • record any incidents or decisions made.
• apply the same professional standards regardless of gender, sexuality or disability.
• comply and are aware of the confidentiality policy.
• are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them. Thrive Lincs Ltd staff having concerns about another member of staff.
• Staff members having concerns about another member of staff will report these to the head tutor.
• Where staff members have concerns about the head tutor, these will be reported to the designated safeguarding lead as appropriate. Where the head tutor is the proprietor then the concern should be reported to the Local Authority Designated Officer (LADO).

School staff having concerns about safeguarding practices:

• All staff and volunteers should feel able to challenge and raise concerns about poor or unsafe practice and potential failures in our settings safeguarding regime or concerns about other agencies by using the LSCP Professional Resolution and Escalation Protocol. Any such concerns will be taken seriously by the designated safeguarding lead and others involved.

6.4 Risk Assessments

Risk assessments are taken seriously and used to good effect to promote safety. Risk assessments are available for all aspects of our settings work, (such as premises and equipment, activities, off-site activities, venues used, transport). Where relevant, risk assessments are carried out for individual students, and supported by action plans identifying how potential risks would be managed.

Individual risk assessments are also used when deciding a response to a child demonstrating potentially harmful behaviour such as sexually harmful behaviour or when identifying whether a child who may be particularly vulnerable, such as a child at risk of Child Sexual Exploitation.

6.5 Safeguarding Information for students

All students in our setting are reminded regularly that they can approach any member of staff. Our setting is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students know that we have a senior member of staff (DSL) with responsibility for Child Protection and safeguarding and know who this is. We inform students of whom they might talk to, both in and out of the setting, their right to be listened to and heard and what steps can be taken to protect them from harm. PSHME and online safety awareness materials we use to help students learn how to keep safe are ChildLine, NSPCC Speak Out Stay Safe, Police, Stranger Danger, and Anti-bullying.

Our setting will ensure that students are made aware that information can be found at the following helplines such as NSPCC and CEOP. Our settings arrangements for consulting with and listening to students are through our pastoral support, DSL and Deputy DSL as well as referrals for counselling, Healthy Minds and other relevant agencies. We make students aware of these arrangements by communicating this in our setting via tutor time, posters,

leaflets, tutor meetings as well as other forms of media.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

6.6 Partnership with Parents

Thrive Lincs Ltd shares a purpose with parents to educate and keep children safe from harm.

Thrive Lincs Ltd takes steps to ensure all parents/carers understand their Child Protection and Safeguarding Policy. The policy is available through Thrive Lincs Ltd's website and parents receive updates on reviews and changes through communication. Parents can raise a concern about their child's safety or about general safeguarding concerns in our setting immediately by contacting our designated safeguarding lead on 07532799831 if there is risk of harm to a child or raising the concern through our complaint's procedure complaints procedure.

Parents are regularly informed of information that they may need to be aware of to help them to protect their children from harm inside and outside our settings environment. Where our setting has concerns for the safety of a child, parents are made aware of these concerns, and their consent is sought in line with local safeguarding procedures unless doing so would increase the risk of harm to the child.

The Designated Safeguarding Lead will have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, child arrangement orders or children that were adopted from state care outside England and Wales. This will be achieved by working with the child in question, the family, relevant outside agencies and the appropriate staff in school. Furthermore, the Designated Safeguarding Lead will contact the local authority/personal advisor as necessary.
We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents 'rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to protect a child. We make safeguarding information available in a variety of formats, e.g. for families with English as an additional language (EAL) etc.

Thrive Lincs Ltd will share with parents any concerns we may have about their child unless to do so might place a child at risk of harm. We encourage parents to discuss any concerns they may have with the DSL and Deputy DSL. Our settings Child Protection Policy is available by accessing Thrive Lincs Ltd website or a written copy will be provided on request.

Thrive Lincs Ltd is committed to ensuring the welfare and safety of all children our

setting. All Lincolnshire education provisions, including Thrive Lincs Ltd, follow the Lincolnshire
Safeguarding Children Partnership procedures. Our setting will, in most circumstances, endeavour to discuss all concerns with parents about their children. However, there may be exceptional circumstances when our setting will discuss concerns with the Children's Services Customer Service Centre and/or the Police without parental knowledge (in accordance with Lincolnshire Safeguarding Children Partnership Procedures). Our setting will, of
course, always aim to maintain a positive relationship with all parents.

6.7 Partnerships with others

Our setting recognises that it is essential to establish positive and effective working relationships with other agencies who are partners in Lincolnshire Safeguarding Children Board. –
E.g. LA, Barnardo's, Police, Health, NSPCC Speak out Stay Safe Project, National Youth Advocacy Service, etc. There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all children.

6.8 School Training and Staff Induction

Thrive Lincs Designated Safeguarding Lead (DSL) with responsibility for child protection, undertakes appropriate child safeguarding training and inter–agency working training (provided by the Lincolnshire Safeguarding Children Partnership).

The DSL and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The DSL and any deputies will undertake formal safeguarding training at least every two years and will receive regular updates at least annually.

In addition to their formal training, their knowledge and skills will be updated (for example, via the weekly safeguarding bulletin uploaded on Perspective Light, meeting other DSLs, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role. DSL's or their deputy will attend at least 2 out of the 3 safeguarding briefings per academic year.

The head tutor and all other staff, including non-teaching staff, will receive appropriate safeguarding and Child Protection training, which is regularly updated. In addition, all staff members will receive safeguarding and Child Protection updates (for example, via e-mail, ebulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Our setting accesses training from LCC Safeguarding in School's Training. All staff (including temporary staff and volunteers) are provided with our setting's child safeguarding policy and informed of our setting's Child Protection arrangements on induction.

6.9 Support, Advice and Guidance for Staff

Staff will be supported by the provision, the Local Authority and professional associations. The Designated Safeguarding Lead for Child Protection will be supported by head tutor and

Deputy DSL. Thrive Lincs Ltd seek advice about safeguarding concerns from Lincolnshire social
care direct on 0345 603 7630.

6.10 Alternative Provision

Thrive Lincs Ltd is committed to safeguarding our children even if they are placed in alternative provision for a period of time within the school day/week. We therefore seek written reassurance that any Alternative Provision provider has acceptable safeguarding practices in place including their response to concerns about a child; safer recruitment processes; attendance and child missing education procedures and appropriate information sharing procedures. Our setting will also obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff. When organising work placements, our setting will ensure that the placement provider has policies and procedures in place to safeguard students. Norfolk County Council will be informed if a child's provision is sub contracted out to enable full NCC checks to be undertaken.

6.11 Checking the identity and suitability of visitors

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

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

Visitors are expected to sign the visitors 'book and wear a visitor's badge. Visitors to our setting who are visiting for a professional purpose, such as educational psychologist, will be asked to show photo ID and:

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out. All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into our setting any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using our facilities is not seeking to disseminate extremist views or radicalise students or staff.

6.12 Pupils with special educational needs, disabilities or health issues

We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Students being more prone to peer group isolation or bullying (including prejudice based bullying) than other students.
- the potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly

showing any signs.

• Communication barriers and difficulties in managing or reporting these challenges. We offer extra pastoral support for these pupils.

6.13 Students with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes.

For example, it will inform decisions about:

• Responding to unauthorised absence or missing education where there are known safeguarding risks.

• The provision of pastoral and/or academic support.

6.14 Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

• appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility,
and care arrangements.

• The DSL has details of children's social workers and relevant virtual school heads.

We have appointed a designated tutor, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated tutor is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role, the designated tutor will:

• work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

• work with virtual school heads to promote the educational achievement of looked after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

6.15 Online Safety Leadership and Oversight

The DSL has strategic responsibility for online safety, working in partnership with the Head Tutor.

Filtering and monitoring systems are in place and are reviewed at least annually to ensure they remain effective. Any online safety incidents or concerns are recorded and managed in line with this safeguarding policy.

Staff receive training on online safety risks, and students are supported to develop safe and responsible online behaviours.

SECTION 7: ALLEGATIONS REGARDING PERSON(S) WORKING IN OR ON BEHALF OF SCHOOL (INCLUDING VOLUNTEERS AND SUPPLY TEACHERS)

7.1 Allegation against a member of staff or someone working at the school

Where an allegation is made against any person working in or on behalf of our setting that he or she has:

- behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This is to take account of situations where a person's behaviour outside our setting may suggest 'transferable risk'. For example, where a member of staff or volunteer is involved in an incident outside of our setting which did not involve children but could have an impact on their suitability to work with children'.

We will apply the same principles as in the rest of this document and we will always follow the Lincolnshire Safeguarding Children Partnership Procedures that can be accessed at Lincolnshire Safeguarding Children Partnership. Detailed records will be made to include decisions, actions taken, and reasons for these. All records will be retained securely in the safe room in our setting.

Whilst we acknowledge such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

Initial action to be taken:

- The person who has received an allegation or witnessed an event will immediately inform the head tutor and make a record.
- In the event that an allegation is made against the head tutor the matter will be reported to the Designated Safeguarding Lead who will act as the head tutor.
- The Head tutor will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs.
- the member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children.
- The Head tutor may need to clarify any information regarding the allegation. No person will be interviewed at this stage.
- the Head tutor (or DSL if the allegation is about the Headtutor) will consult with the

Local Authority Designated Officer via the LADO referral form immediately, in order to determine if it is appropriate for the allegation to be dealt with by Thrive Lincs Ltd or whether there needs to be a multi-agency response to the matter.

• The needs of the child/children will remain at the centre of all action taken. With this in mind, any referral to the Local Authority Designated Officer should also be accompanied by consultation with Lincolnshire Customer Service Centre when appropriate.

This is to establish from the outset whether the concerns identified meet the threshold for a Section 47 Child Protection investigation and/or the police in respect of any criminal investigation.

• Consideration will be given throughout to the support and information needs of students, parents, staff and the employee the subject of the allegation.

• The head tutor will inform the DSL of any allegation against a member of staff. If consideration needs to be given to the individual's employment and immediate management of risk, advice will be sought from either Lincolnshire County Council HR.

LADO contact details

Lincolnshire LADO contact details: 01522 554674
Out of hours 01522 782333 or email LSCP_LADO@lincolnshire.gov.uk.

Lincolnshire LADO Referral form.

Cambridgeshire LADO contact details: 01223 727967 or 0345 0455203
Out of hours 017330234724 or email LADO@cambridgeshire.gov.uk.

Cambridgeshire LADO Referral form.

Norfolk LADO contact details: 01603 223473
Out of hours 03448008020 or email LADO@norfolk.gov.uk.

LADO Referral & Consultation Form.

Additional services

Lincolnshire Children's Services 01522 782111 or Out of hours 01522 782333.

Lincolnshire County Council Child Protection form.

Lincolnshire County Council Children's Services form.

Lincolnshire Police 015220532222 or 999 in the case of an emergency.

Cambridgeshire Children's Social Care 034500455203 Out of hours 017330234724.

Cambridgeshire County Council Child Protection form.

Cambridgeshire County Council Children's Services form.

Cambridgeshire Police 01223 358966 or 999 in the case of an emergency.

Norfolk Children's Advice and Duty Service 03448008021 or Out of hours 03448008020.

Norfolk Police 01953 424455 or 999 in the case of an emergency.

7.2 Complaints and concerns about school safeguarding policies

Complaints against staff that are likely to require a Child Protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 2). For more information on allegations against staff is found in the Allegations against staff policy.

7.3 Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome. Concerns and referrals will be kept in a separate Child Protection file for each child. Any nonconfidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period after they have left our setting.

Safeguarding records which contain information about allegations of sexual abuse will be retained in line with statutory safeguarding retention guidance and local authority procedures.

If a child for whom our setting has, or has had, safeguarding concerns moves to another education provider, the DSL will ensure that their Child Protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving education provider and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

7.4 Low-Level concerns

A low-level concern is any concern about an adult's conduct that does not meet the harm threshold but is inconsistent with the staff code of conduct or professional boundaries.

All low-level concerns must be reported to the Head Tutor and DSL and recorded securely. The Head Tutor and DSL will review concerns to identify patterns, ensure appropriate action is taken, and determine whether escalation is required.

APPENDIX 1: SAFER RECRUITMENT AND DBS CHECKS – POLICY AND PROCEDURES

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of *Keeping Children Safe in Education.*

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

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

Advertising When advertising roles, we will make clear:

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

Application forms Our application forms will:

- include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).
- include a copy of, or link to, our Child Protection Policy and our policy on the employment of ex-offenders.

Shortlisting

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

- consider any inconsistencies and look for gaps in employment and reasons given for them.
- explore all potential concerns.

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - o if they have a criminal history; o whether they are included on the barred list.

o whether they are prohibited from teaching.
o information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
o any relevant overseas information.

- Sign a declaration confirming the information they have provided is true.

Seeking references and checking employment history

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

When seeking references, we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- verify their identity.
- obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition

below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service of Online Direct. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.

• obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.

• verify their mental and physical fitness to carry out their work responsibilities.

• verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.

• verify their professional qualifications, as appropriate.

• ensure they are not subject to a prohibition order if they are employed to be a teacher.

• carry out further additional checks, as appropriate, on candidates who have lived or
worked outside of the UK. Where available, these will include:

o For all staff, including teaching positions: criminal records check for overseas applicants.

o For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.

o Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary
of state.

Management positions are most likely to include, but are not limited to, headteachers, head tutors, principals and deputy/assistant headteachers. Regulated activity means a person who will be:

• Responsible, on a regular basis in our setting, for teaching, training, instructing, caring for or supervising children.

• carrying out paid, or unsupervised unpaid, work regularly in our setting where that work provides an opportunity for contact with children.

• engaging in intimate or personal care or overnight activity, even if this happens only
once and regardless of whether they are supervised or not.

Existing staff

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

• There are concerns about an existing member of staff's suitability to work with children.

• An individual moves from a post that is not regulated activity to one that is.

• There has been a break in service of 12 weeks or more. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

• We believe the individual has engaged in relevant conduct.

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

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

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

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

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

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

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

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers
Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.

- carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where our setting makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where our school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner education provider abroad to ensure that similar assurances are undertaken prior to the visit.

APPENDIX 2: ALLEGATIONS OF ABUSE MADE AGAINST STAFF

Section 1: Allegations that may meet the harms threshold

Section applies to all cases in which it is alleged that a current member of staff, including a tutor, supply teacher, volunteer or contractor has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of our setting.

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

A ‘case manager ’will lead any investigation. This will be nominated by the Designated Safeguarding Lead where the head tutor is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within our setting so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in our setting so that they do not have unsupervised access to children.
- Moving the child or children to rooms where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted. If in doubt, the case manager will seek views from the provision's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or

children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at our setting is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at our setting and their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern. To record this decision and the justification for it and agree with the designated officer what information should be put in writing. What action should follow, in respect of both the individual and those who made the initial allegation?
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in our setting and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If our setting is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching/tutoring, pending the findings of the investigation by the Teaching Regulation Agency.

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

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by our setting, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The head tutor will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of our setting, while our setting carries out the investigation.
- We will involve the agency fully, but our setting will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary) When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Timescales We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:
- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days However; these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services. Conclusion of a case where the allegation is substantiated If the allegation is substantiated and the individual is dismissed, or our setting ceases to use their services, or the individual resigns or otherwise ceases to provide their services, our school will make a referral to the

DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching/tutoring staff, our setting will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching. Individuals returning to work after suspension If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

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

Unsubstantiated, unfounded, false or malicious reports
If a report is:

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

Confidentiality and information sharing
Our setting will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises Record-keeping The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

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

the records to be retained on the file).

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

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference in these cases, our setting will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will retain these in line with statutory safeguarding retention guidance and local authority procedures. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether
there are any improvements that we can make to our setting's procedures or practice to help prevent similar events in the future.
This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion.
- Complaint.
- Disclosure made by a child, parent or other adult within or outside our setting.
- Pre-employment vetting checks We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work,

and

- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating or offensive language.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others. • Empowering staff to share any low-level concerns as per section 7.7 of this policy.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in our setting's safeguarding system.

Safeguarding Policy

Responding to low-level concerns

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

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

The head tutor will use the information collected to categorise the type of behaviour and determine any further action, in line with our setting's Code of Conduct.

Record keeping

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

Records will be:

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

References

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

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