



Safeguarding Policy



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1. Key Contacts for Safeguarding and Child Protection

Role / Organisation	Name	Contact Details
Designated safeguarding lead (DSL)	Daniella Hart	daniella@newheartlearning.co.uk
Deputy designated safeguarding lead (DDSL)	Nicola Klimczuk	office@newheartlearning.co.uk
Local authority designated officer (LADO)	Children's LADO Cambridgeshire	01223 727967 LADO@cambridgeshire.gov.uk
Cambridgeshire & Peterborough Safeguarding Children's board	MASH	0345 045 5203 - Children's services
Cambridgeshire Safeguarding Adults Board	Adults MASH	Cambridgeshire: Call 0345 045 5202 (Monday to Friday, 9am to 5pm) Out of Hours call 01733 234724
Counter – Extremism Channel helpline		020 7340 7264 counter.extremism@education.gov.uk
NSPCC helpline		0808 800 5000 Nspcc.org.uk

If you need urgent help, call 999.

2. Summary

Safeguarding and Child Protection Statement

NewHeart Learning is fully committed to safeguarding and promoting the health, safety, and welfare of every child and young person in our care. We recognise our responsibility to provide a secure, nurturing environment where pupils feel safe, valued, and respected, and where their voices are heard.

To ensure appropriate and timely responses to any safeguarding concerns, NewHeart Learning has developed its own Safeguarding and Child Protection Procedures, aligned with the statutory guidance set out in:

- Keeping Children Safe in Education (KCSIE, 2024)
- Working Together to Safeguard Children (2023)
- The Cambridgeshire Local Safeguarding Children Partnership (LSCP) procedures
- National and local guidance for managing allegations against those working with children

3. Legislative Framework and Guidance

This policy is underpinned by the statutory guidance issued by the Department for Education (DfE), particularly:

- Keeping Children Safe in Education (KCSIE, 2024)
- Working Together to Safeguard Children (2023)

NewHeart Learning adheres to these national expectations alongside the procedures outlined by our local safeguarding partners in Cambridgeshire.

This policy also reflects the requirements set out in the following key legislation and guidance:

- The Children Act 1989 and 2004 – Establishes the legal framework for safeguarding and promoting the welfare of children
- The Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015) – Places a statutory duty on teachers to report any known cases of FGM involving a girl under 18 directly to the police
- Statutory Guidance on FGM – Outlines the responsibilities of education settings to safeguard and support girls at risk of or affected by FGM
- The Rehabilitation of Offenders Act 1974 – Sets out when individuals with criminal convictions may work with children
- The Safeguarding Vulnerable Groups Act 2006 (Schedule 4) – Defines what constitutes 'regulated activity' with children and outlines eligibility for working in such roles
- The Counter-Terrorism and Security Act 2015 (Prevent Duty) – Requires schools and alternative provisions to take measures to prevent pupils from being drawn into terrorism or radicalisation
- What to do if you're worried a child is being abused (DfE, 2015) - All staff at NewHeart Learning are trained to recognise signs of abuse and know how to respond swiftly by following safeguarding procedures and contacting the DSL/DDSL.

- Searching, Screening and confiscation (DfE, 2022) -Sets out the powers that alternative provisions have to screen and search pupils, and to confiscate items where necessary, to maintain a safe environment, for further information please see our behaviour policy.
- Sharing Nudes and Semi-Nudes: advice for education settings (UKCIS, 2020) - NewHeart Learning ensures that staff know how to respond appropriately to incidents involving sharing of sexual images, please refer to section 14.
- The Human Rights Act 1998 – Reinforces that harassment, abuse or violence (including sexual violence) can breach an individual's rights under the European Convention on Human Rights (ECHR)
- The Equality Act 2010 – Prohibits discrimination based on protected characteristics, including disability, sex, race, sexual orientation, and gender reassignment. The Act permits positive action to support disadvantaged pupils, such as addressing the disproportionate impact of sexual harassment on girls
- The Public Sector Equality Duty (PSED) – Requires us to have due regard for eliminating discrimination, advancing equality, and fostering good relations. This includes considering how factors like sexual violence, homophobic or transphobic bullying, or racial discrimination may place some pupils at greater risk
- National Standards for Alternative Provision (DfE, 2024 –emerging statutory framework) – Ensures our safeguarding responsibilities are met in line with guidance specific to alternative provision settings
(Available at: Alternative provision – GOV.UK)

NewHeart Learning is committed to fulfilling all its legal duties, promoting equality, and ensuring that every young person is protected from harm and supported to thrive.

Information Sharing

NewHeart Learning recognises the importance of proactive information sharing between professionals, referring schools and local authorities in order to effectively meet pupils' needs and identify any need for early help.

Staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on provisions to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes. Data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing any information, please speak to the DSL or DDSL.

4. Definitions

At NewHeart Learning, we adopt the following definitions in line with statutory guidance from Keeping Children Safe in Education (KCSIE 2024) and Working Together to Safeguard Children (2023).

Safeguarding and Promoting the Welfare of Children

This refers to the wider duties carried out to ensure the safety, health, and wellbeing of all children.

It includes:

- Protecting children from abuse and maltreatment
- Preventing harm to children's mental or physical health or development
- Ensuring that children are raised in environments that offer safe and effective care
- Taking proactive steps to help children achieve the best possible outcomes in life

Child Protection

Child protection is a core element of safeguarding and focuses on actions taken to prevent children from experiencing or being at risk of significant harm, including physical, emotional, sexual abuse, and neglect.

Abuse

Abuse is any form of maltreatment that causes, or risks causing, harm to a child. It can involve the direct infliction of harm or the failure to take action to prevent harm. (See Appendix 1 for more detailed descriptions of the types of abuse.)

Neglect

Neglect is a specific form of abuse involving the persistent failure to meet a child's basic physical and/or emotional needs. It often results in serious damage to a child's health, wellbeing, or development. (More detail is available in Appendix 1.)

Sharing of Nudes and Semi-Nudes

Sometimes referred to as "sexting" or "youth-produced sexual imagery", this includes the sharing of nude or semi-nude photos, videos, or livestreams by children. It also covers computer-generated pseudo-images that appear to depict a real person. These behaviours carry safeguarding and legal implications and are always responded to in line with our safeguarding procedures.

Children

For the purposes of safeguarding, the term "children" applies to any individual under the age of 18, regardless of their ability, background, or circumstances.

Safeguarding Partners

Under the Children Act 2004 (as amended by the Children and Social Work Act 2017), the following three local safeguarding partners are required to work together to promote the welfare of children and respond to their needs:

- The Local Authority (LA)
- The Integrated Care Board (ICB) for the area (formerly known as Clinical Commissioning Groups)
- The Chief Officer of Police for the relevant police area

These partners form the foundation of multi-agency safeguarding arrangements and coordinate responses to child protection concerns in Cambridgeshire and surrounding areas.

Language and Sensitivity Around Abuse

- The term "victim" is commonly used to describe someone who has experienced abuse. However, at NewHeart Learning, we recognise that not every child may identify with this term. We always use language that reflects the preferences and dignity of the child involved.
- Terms like "alleged perpetrator" or "perpetrator" may be used in documentation or formal processes. However, we will always be mindful of the context—especially in the presence of children—and will choose our language with care. We understand that harmful behaviours may also reflect unmet needs or prior trauma experienced by the child displaying them, and we respond accordingly.

5. Equality and Inclusion Statement

At NewHeart Learning, we recognise that some children may be at an increased risk of abuse or neglect both online and offline and that additional barriers may exist which make it more difficult for some pupils to recognise, report, or disclose harm.

We are firmly committed to anti-discriminatory practice and to creating an environment where every child is respected, valued, and safeguarded regardless of their background, identity, or personal circumstances.

We work to ensure that all pupils receive the same high level of protection and support, and we take proactive steps to identify and reduce risks for those who may be more vulnerable.

We give particular attention to children and young people who:

- Have special educational needs and/or disabilities (SEND), or ongoing medical or health needs
- Are young carers, with responsibilities at home
- May face discrimination based on their race, ethnicity, religion, gender identity, or sexual orientation
- Speak English as an additional language
- Live in challenging circumstances, such as temporary accommodation, or are affected by substance misuse, domestic abuse, or other household vulnerabilities
- Are at risk of female genital mutilation (FGM), child sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers or newly arrived in the UK
- Are affected by mental health concerns, either their own or those of a family member
- Are looked after children (LAC) or have previously been in care
- Are frequently absent or missing from education
- Have a parent or carer who has expressed an intention to electively home educate

Our safeguarding practice reflects an inclusive, child-centred approach that acknowledges and responds to each pupil's unique vulnerabilities and needs.

6. Safeguarding is Everyone's Responsibility

At NewHeart Learning, we firmly believe that safeguarding is a shared responsibility. While local and placing authorities hold statutory duties, every member of our team plays a vital role in protecting the welfare of the children and young people in our care.

We are committed to placing pupils at the heart of everything we do, ensuring that all decisions and actions are made in the best interests of the child.

We actively promote a culture of openness, trust, and mutual respect, where students feel safe, valued, and confident to speak up. Listening to and valuing the voice of each child is central to our safeguarding approach.

Our staff adopt a "it could happen here" mindset, remaining vigilant at all times and ensuring that safeguarding concerns are identified, acted upon, and followed up with urgency and care.

7. Local Arrangements for the Provision

Local arrangements for the provision All staff must be aware of the local arrangements for safeguarding, the local arrangements for NewHeart Learning are as follows:

Role / Organisation	Name	Contact Details
Designated safeguarding lead (DSL)	Daniella Hart	daniella@newheartlearning.co.uk
Deputy designated safeguarding lead (DDSL)	Nicola Klimczuk	office@newheartlearning.co.uk
Local authority designated officer (LADO)	Children's LADO Cambridgeshire	01223 727967 LADO@cambridgeshire.gov.uk
Cambridgeshire & Peterborough Safeguarding Children's board	MASH	0345 045 5203 - Children's services
Cambridgeshire Safeguarding Adults Board	Adults MASH	Cambridgeshire: Call 0345 045 5202 (Monday to Friday, 9am to 5pm) Out of Hours call 01733 234724
Channel helpline		020 7340 7264 counter.extremism@education.gov.uk

If there is a concern or allegation against the DSL or Deputy DSL, staff should inform the LADO. All other concerns against a member of staff should be raised with a member of the designated safeguarding team as named above. If you think a child is in immediate danger, phone 999.

Raising a Safeguarding Concern

If you are concerned about the welfare of a child or adult and need to raise a safeguarding concern, you should complete the relevant online Safeguarding Referral Form (child or adult).

When completing a referral, please ensure the following:

- Provide accurate and complete information including full names (with correct spelling), dates of birth, addresses, ethnicity, first language, any disabilities, and the details of family members involved.
- Seek consent from the individual or family before sharing information with Social Care, unless doing so would increase the risk of immediate or significant harm, or if it could result in the destruction of evidence or influence a disclosure.
- If there is an immediate risk of serious harm, do not delay the referral process in order to seek consent—make the referral immediately.
- Clearly outline the concerns and explain how they are impacting the child or adult at risk. Include details of any previous support that has been provided and highlight the strengths and resilience within the family or support network.
- Specify what outcomes or actions you believe are needed as a result of the referral, and wherever possible, include the views of the child or adult and their family.
- The more comprehensive the information provided, the more effectively the Multi-Agency Safeguarding Hub (MASH) can determine the best course of action.

How to raise a concern

Professionals should use the secure online referral form to raise safeguarding concerns with Children's Services. This method ensures a more efficient and protected submission process and provides a reference number upon completion.

Thresholds of need

Before submitting the online form, please refer to the Effective Support Document webpage – this provides the relevant part of the Thresholds and Pathways guidance that helps you to identify the child's level of risk and an appropriate level of support.

Once you are sure that a referral is appropriate, you can complete the online referral form.

[Cambridgeshire County Council: Professional reporting of Child Abuse - Cambridgeshire County Council](#)

8. Safeguarding and Child Protection Responsibilities

At NewHeart Learning, safeguarding and child protection are the responsibility of everyone who works or volunteers in our provision. This policy applies to all members of staff and volunteers across the setting.

We take a proactive approach to safeguarding through a strong commitment to preventative education. This is delivered through a whole-setting ethos that prepares students for life in modern Britain and promotes a culture where harmful behaviours such as sexism, misogyny/misandry, homophobia, biphobia, transphobia, and any form of sexual harassment or violence are not tolerated.

This commitment is embedded in:

- Our Behaviour Policy
- A planned programme of Relationships, Sex and Health Education (RSHE) that is inclusive, age-appropriate, and regularly delivered. This programme covers:
 - Respectful and healthy relationships
 - Boundaries and mutual consent

- Challenging stereotypes, prejudice, and promoting equality
- Body image, confidence, and self-esteem
- Recognising abusive and coercive behaviour
- Understanding the law around sexual consent, exploitation, abuse, grooming, domestic abuse, forced marriage, FGM, and honour-based violence — and knowing how to seek support
- Why sexual harassment and violence are unacceptable and how to challenge them

Staff Responsibilities

All staff at NewHeart Learning will:

- Read and understand Part 1 and Annex B of *Keeping Children Safe in Education (KCSIE)*, reviewing it annually
- Sign an annual declaration to confirm they have reviewed and understood the guidance
- Implement safer recruitment practices see NewHeart Learning's Safer Recruitment Policy
- Provide a safe and supportive space where pupils feel heard, respected, and safe to disclose concerns
- Reinforce online safety messages when communicating with families
- Be alert to possible signs of abuse or neglect, especially in children with communication needs or additional vulnerabilities
- Follow internal safeguarding procedures for reporting concerns immediately and appropriately
- Cooperate with multi-agency safeguarding partners and share concerns without delay
- Support pupils in understanding what constitutes healthy relationships and how to recognise unsafe behaviours from adults or peers

Staff are expected to be familiar with:

- Our safeguarding policies and systems, including this policy, our Behaviour Policy, Online Safety Policy, and the Staff Code of Conduct
- The identities and roles of our Designated Safeguarding Lead (DSL) and Deputy DSL
- The Early Help process, including how to identify emerging issues, engage the DSL, and work collaboratively with other professionals
- Referral procedures to children's social care, including their role in potential statutory assessments
- How to respond if a child discloses abuse or neglect, including cases involving FGM or serious violence, and how to maintain appropriate confidentiality
- Signs of abuse and neglect, and specific safeguarding issues such as:
 - Child-on-child abuse
 - Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
 - County lines involvement or risk of serious youth violence
 - Radicalisation and extremism
 - Online harm or inappropriate content
- How to reassure victims that they are being taken seriously and will be supported
- The fact that children can experience harm inside and outside the home, in school, and online
- Awareness that children who identify (or are perceived to identify) as LGBTQ+ may be more at risk
- Indicators that a child may need additional help or protection

Designated Safeguarding Lead (DSL)

Our DSL has lead responsibility for safeguarding and child protection at NewHeart Learning. This includes responsibility for online safety and oversight of digital safeguarding systems.

The DSL will be provided with time, training, and resources to:

- Support and advise staff on safeguarding matters
- Attend or support staff in attending safeguarding strategy meetings
- Contribute to the assessment and planning for vulnerable pupils
- Make or support referrals to:
 - Children's Social Care
 - The Channel Programme
 - The Police
 - Disclosure and Barring Service (DBS)
- Understand and respond to harmful sexual behaviours and be confident in using local services
- Lead implementation of this policy and ensure all staff, students, and parents understand it
- Ensure parents/carers are made aware of this policy when their child joins the provision and that it is accessible on our website

We will not permit any visitor or speaker who promotes extremist views or seeks to influence students or staff with radicalised messaging. Appropriate checks will be made before allowing individuals or organisations to speak or use our facilities.

Safeguarding Culture and Oversight

- The provision's safeguarding procedures are readily accessible to all staff and form the basis for reporting, recording, and responding to concerns or allegations
- Staff understanding is regularly reviewed during induction, supervision, probation reviews, and annual appraisals
- All concerns about a pupil's welfare or behaviour—including low-level concerns—are taken seriously and addressed in line with our policy
- A designated safeguarding lead (DSL) and a deputy DSL (DDSL) are in place and trained to a high standard. At NewHeart Learning, the DSL is Daniella Hart (Head of Alternative Provision) and the DDSL is Nicola Klimczuk (Head of Business Operations)

Response to Allegations and Referrals

- Any concern that a pupil may be at risk of significant harm must be reported immediately to the DSL or DDSL
- The DSL/DDSL will make prompt referrals to:
 - The Local Authority Designated Officer (LADO)
 - Children's Social Care
 - The pupil's placing authority social worker
 - Police, where necessary
- All incidents are recorded in detail using our secure electronic safeguarding system, in accordance with data protection legislation and safeguarding protocols

Managing Visitors and External Professionals

All visitors to NewHeart Learning must:

- Provide identification upon arrival
- Sign in using our visitor system and wear a visitor badge at all times

- Leave personal items (including mobile phones) in a secure place

For professionals (e.g., educational psychologists, LA officers):

- A valid photo ID and DBS certificate will be checked, or
- Confirmation from the sending organisation (e.g., LA) that appropriate safeguarding checks have been completed

All other visitors and guest speakers will be accompanied by a staff member throughout their visit.

Commitment to Child-Centred Practice

At NewHeart Learning, we expect all staff to put the child at the centre of every decision and to act in their best interests at all times. We are committed to a safeguarding culture where every pupil is safe, supported, and empowered to thrive—emotionally, socially, and academically.

9. Confidentiality at NewHeart Learning

At NewHeart Learning, we understand that effective safeguarding depends on timely, appropriate, and responsible information sharing. Everyone involved in supporting and caring for our students has a duty to share accurate and relevant information with the appropriate professionals in a timely manner to help keep children safe.

We follow these key principles:

- Timely and proportionate information sharing is crucial for effective safeguarding.
- Concerns about breaching confidentiality must never prevent action when it is necessary to promote a child's welfare or protect their safety.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent the sharing of information for safeguarding purposes.
- Where 'special category personal data' needs to be shared (such as health, ethnicity, or safeguarding details), the DPA 2018 permits this without consent where:
 - It is not possible to gain consent,
 - Gaining consent cannot be reasonably expected, or
 - Seeking consent would place a child at risk of harm.

Staff must never promise a child that they will keep a disclosure of abuse confidential, as this may conflict with the need to safeguard the child.

Responding to Requests for Anonymity

If a student requests that a disclosure especially of sexual violence or sexual harassment be kept confidential:

- There is no one-size-fits-all answer. Even if a child does not consent to information being shared, staff may still share it if there is a lawful basis to do so under UK GDPR.
- The DSL must carefully balance the child's wishes with the duty to protect the child and others.
- Key considerations include:
 - Parents/carers will usually be informed, unless doing so would put the child at further risk.
 - The fundamental safeguarding principle remains: if a child is at risk, in immediate danger, or has been harmed, a referral must be made to the local authority children's social care.

- Allegations of rape, assault by penetration, or sexual assault are criminal matters and must be referred to the police, regardless of the age of the alleged perpetrator (including under the age of criminal responsibility).

Protecting Anonymity

When managing reports of sexual violence or harassment:

- All staff must be mindful of the need for confidentiality and anonymity, especially where a criminal investigation is underway.
- Staff should:
 - Take all reasonable steps to protect the identity of those involved.
 - Carefully consider who needs to know about the report within the provision.
 - Be alert to the risks posed by social media, which may spread rumours or identify those involved.

Guidance and Support for Staff

- We follow the government's 7 'golden rules' for information sharing, which guide staff on when and how to share information safely and lawfully.
- If any member of staff is unsure about what information to share or how to do so appropriately, they must consult the DSL or Deputy DSL for advice.

Transferring Child Protection Records

When a student leaves NewHeart Learning:

- The DSL will ensure that any child protection records are transferred securely and promptly to the student's new setting:
 - Within 5 working days of an in-year transfer
 - Within the first 5 days of the start of a new term
- These files will be sent separately from the main pupil file, and confirmation of receipt will be obtained to ensure a clear handover of safeguarding responsibility.

10. Recognising Abuse and Taking Action

At NewHeart Learning, all staff and volunteers are expected to be vigilant and proactive in identifying the signs of abuse, neglect, or exploitation. Early identification can be crucial in protecting a child from harm. Staff should be alert to any indicators that a child may need early help, particularly if they:

- Have a disability
- Have special educational needs (SEND), with or without an Education, Health and Care Plan (EHCP)
- Are a young carer
- Have experienced a bereavement
- Are showing signs of involvement in anti-social or criminal behaviour, including gang affiliation, county lines activity, organised crime, or serious violence such as knife crime
- Are frequently missing from school, home, or care settings
- May be at risk of modern slavery, trafficking, or sexual/criminal exploitation
- Are vulnerable to radicalisation or extremist influence
- Are engaging with harmful or inappropriate online content, including exposure to violence or forming unsafe online relationships

- Are living in a home environment where there are challenges such as substance misuse, mental health issues, or domestic abuse
- Are misusing drugs or alcohol
- Are struggling with mental ill health
- Have recently returned home from being in care
- May be at risk of so-called 'honour'-based abuse, such as female genital mutilation (FGM) or forced marriage
- Are in a private fostering arrangement
- Have a parent/carer in custody or are impacted by parental offending
- Are missing education, persistently absent, or not receiving full-time education
- Have been suspended multiple times or are at risk of, or have already been, permanently excluded

What Staff and Volunteers Must Do

Any member of staff or volunteer who notices a concern or suspects that a student is at risk of harm must act immediately, following NewHeart Learning's safeguarding procedures:

- Report concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay.
- Record concerns accurately and clearly, including dates, times, and details of any disclosures or observations.
- Maintain confidentiality but understand that this does not mean keeping secrets safeguarding always takes precedence.
- Take concerns seriously, even if there is no 'proof', and operate from the perspective that "it could happen here."

This proactive and vigilant approach is key to ensuring the safety and well-being of every student at NewHeart Learning.

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

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral. Tell the DSL as soon as possible if you make a referral directly. <https://www.gov.uk/report-child-abuse-to-local-council>.

Responding to a Child's Disclosure

If a child shares a safeguarding concern or makes a disclosure to you:

- Listen attentively and take the disclosure seriously. Allow the child to speak freely without interruption. Avoid asking leading or suggestive questions.
- Remain calm and composed. Do not show shock, distress, or disbelief, as this may discourage the child from continuing.
- Reassure the child that they have done the right thing by speaking up. Avoid saying they should have told someone sooner.
- Be honest about the next steps. Explain that you cannot keep the information confidential and that you have a duty to share it with the appropriate safeguarding staff to help keep them safe.
- Make a written record of the disclosure as soon as possible, using the child's own words where possible. Stick to factual details and avoid adding personal opinions or interpretations.
- Inform the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) immediately.

- If necessary, and especially in cases where the child may be at immediate risk, make a referral to children's social care and/or the police without delay. Ensure the DSL is informed of any direct referral as soon as practically possible.
- Maintain confidentiality. Do not discuss the disclosure with anyone else, except those who are directly involved in safeguarding or investigative processes.

Please be aware that some children may:

- Be unsure how to share what has happened to them;
- Not understand that their experiences are abusive or harmful;
- Feel ashamed, fearful, or embarrassed particularly if they have additional vulnerabilities such as disabilities, language barriers, or issues relating to their gender identity or sexual orientation.

These barriers must not deter staff from exercising professional curiosity and promptly raising concerns with the DSL if they suspect a child may be at risk.

11. Child Absent from Education

Repeated absence from education can be an indicator of various safeguarding concerns, including abuse or neglect (such as sexual abuse, exploitation, or criminal exploitation), mental health issues, substance misuse, radicalisation, female genital mutilation (FGM), or forced marriage.

Certain groups of children are more vulnerable to becoming absent or missing from education, including those who:

- Are at risk of harm or neglect
- Are vulnerable to forced marriage or FGM
- Belong to Gypsy, Roma, or Traveller communities
- Come from military families
- Have gone missing or run away from home or care
- Are under youth justice supervision
- Stop attending school
- Are from newly arrived migrant families

Our procedures address unauthorised absences and repeated absences to identify and reduce risks of abuse, neglect, and sexual exploitation, and to help prevent future missing episodes. This includes notifying the local authority if a child leaves without naming a new school and sharing information with the local authority when removing a child's name from the admission register during non-standard transition periods.

Staff receive training to recognise signs and triggers linked to safeguarding concerns related to absence, including travel to conflict zones, FGM, and forced marriage.

If staff suspect a child is suffering harm or neglect, local child protection procedures will be followed, including making reasonable enquiries. Immediate referrals will be made to children's social care and the police if a child is at risk of harm or in immediate danger.

12. Specific Safeguarding Issues – Child Criminal Exploitation (CCE)

Child criminal exploitation is a form of abuse where an individual or group exploits a power imbalance to coerce, control, manipulate, or deceive a child into engaging in criminal activities. This exploitation may involve an exchange such as providing something the child needs or wants or serve the financial or other interests of the abuser. It may also involve violence or threats of violence.

CCE can be carried out by males or females, adults or children. It can be a single incident or a series of repeated abuses, ranging from opportunistic acts to highly organised criminal activity.

Exploitation can occur even if the child appears to consent, and it does not always involve physical contact. It may also take place online. Examples include forcing children to work in cannabis farms, coercing them to transport drugs or money across regions (“county lines”), compelling them to shoplift or pickpocket, or to threaten other young people.

Possible signs of CCE include:

- Possessing unexplained gifts or new items
- Associating with peers involved in exploitation
- Experiencing changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods or frequently returning late
- Regularly missing school or not engaging in education

If staff suspect a child is being criminally exploited, they must discuss their concerns with the Designated Safeguarding Lead (DSL). The DSL will initiate local safeguarding procedures, which may include referring the case to children’s social care and the police as needed.

13. Specific Safeguarding Issues – Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse in which an individual or group exploits a power imbalance to coerce, manipulate, or deceive a child into sexual activity. This may involve exchanging sexual activity for something the child needs or wants, or for the perpetrator’s financial gain or social status. Violence or threats of violence may, but do not always, accompany the abuse. CSE can be perpetrated by males or females, adults or other children. It may be a one-off incident or occur over a prolonged period, and it can range from opportunistic abuse to highly organised criminal activity.

Exploitation can occur even if the child appears to consent. Many young people do not realise they are being abused, often trusting their abuser or believing they are in a genuine relationship.

CSE can involve physical sexual contact (penetrative or non-penetrative) or non-contact sexual activities, and it can occur online. Examples include persuading or forcing a child to share sexual images, engaging in sexual conversations via text, or participating in sexual acts over webcam. Abuse can also occur without the child’s immediate awareness, such as when sexual images or videos are shared without their knowledge.

Additional indicators of CSE (in addition to those listed for CSE) include:

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

If staff suspect a child is experiencing CSE, they must report their concerns to the Designated Safeguarding Lead (DSL), who will initiate local safeguarding procedures. This may include making referrals to children's social care and the police.

14. Specific Safeguarding Issues – Child on Child

Child-on-child abuse occurs when one child harms another. It can happen inside or outside of school, face-to-face, online, or both.

Our provision does not tolerate sexual violence, sexual harassment, or any form of child-on-child abuse. We recognise that a lack of reports does not mean such abuse is not taking place.

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

- Bullying (including cyberbullying, prejudice-based, or discriminatory bullying)
- Abuse in intimate personal relationships between children ("teenage relationship abuse")
- Physical abuse such as hitting, kicking, shaking, biting, hair-pulling, or any other act causing physical harm (including acts facilitated or encouraged online)
- Sexual violence, such as rape, assault by penetration, and sexual assault (including incidents facilitated or encouraged online)
- Sexual harassment, including sexual comments, jokes, or online harassment, whether in isolation or as part of a wider pattern of abuse
- Coercing someone to engage in sexual activity without consent, such as forcing them to strip, touch themselves sexually, or engage in sexual acts with another person
- Sharing nude or semi-nude images or videos (consensual or non-consensual) sometimes referred to as sexting or youth-produced sexual imagery
- Upskirting, taking a photograph under a person's clothing without permission to view their genitals or buttocks for sexual gratification or to cause humiliation, distress, or alarm
- Initiation or hazing-type violence and rituals activities that involve harassment, abuse, or humiliation as part of being accepted into a group, which may also have an online element

Online child-on-child abuse can include abusive or misogynistic messages, sharing indecent images non-consensually (especially in group chats), or sending pornographic content to someone who does not wish to receive it.

When staff suspect child-on-child abuse, or a child discloses it, they must follow the procedures outlined in this policy.

In cases of harmful sexual behaviour between children, we will take into account their ages and developmental stages. We recognise that children displaying harmful sexual behaviour have often experienced abuse or trauma themselves, and we will ensure they receive appropriate support.

15. Specific Safeguarding Issues – Domestic Abuse

Children who witness domestic abuse or violence between family members at home can be deeply affected. In some cases, children may blame themselves for the abuse or may have been forced to leave the family home as a result.

Domestic abuse can take various forms, including intimate partner violence, abuse by family members, teenage relationship abuse (abuse within intimate relationships between children), and child or adolescent-to-parent violence and abuse. It may be physical, sexual, financial, psychological, or emotional. It can also involve non-physical mistreatment or the experience of witnessing abuse inflicted on others. This is especially important in understanding the impact of all forms of domestic abuse on children who see, hear, or otherwise experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality, or background. Domestic abuse may occur inside or outside the home. Children who witness domestic abuse are also considered victims.

Older children may both experience and perpetrate domestic abuse or violence in their personal relationships, including sexual harassment.

Exposure to domestic abuse can have serious and long-lasting emotional and psychological consequences for children, affecting their health, wellbeing, development, and ability to learn.

When police respond to a domestic abuse incident involving children, and if those children live in the household, they will inform the designated safeguarding lead (DSL) or key adult in the school prior to the child's return the next day. This follows procedures under Operation Encompass, where police forces work with schools to support affected children.

The DSL will provide support tailored to the child's needs and keep records updated on their circumstances.

16. Specific Safeguarding Issues – Homelessness

Being homeless, or at risk of homelessness, poses significant risks to a child's welfare. The DSL and Deputy DSL will maintain knowledge of local housing authority contacts and referral processes to raise concerns as early as possible, following local guidance and procedures. If a child has been harmed or is at risk of harm, the DSL will also refer the case to children's social care.

17. Specific Safeguarding Issues – Sexual Violence and Harassment

Sexual Violence and Sexual Harassment Between Children in Schools

Sexual violence and sexual harassment can occur:

- Between two children of any age and gender
- Involving groups of children sexually assaulting or harassing one child or a group of children
- Both online and face-to-face, including physical and verbal forms

These behaviours exist on a continuum and may overlap.

Children who experience sexual violence or harassment often find it distressing and stressful. Such experiences are likely to negatively impact their education, particularly if the alleged perpetrator attends the same school.

If a child reports an incident, it is crucial that staff:

- Reassure the child they are being taken seriously

- Provide support and ensure the child's safety
- Avoid making the child feel like they are causing a problem by reporting abuse or neglect
- Never shame the child for coming forward

When supporting victims, staff will:

- Remind them that the law around child-on-child abuse exists to protect them, not to criminalise them
- Regularly review decisions and update policies based on lessons learned
- Monitor for any patterns of concerning or inappropriate behaviour, and decide on appropriate actions
- Consider whether school culture contributes to inappropriate behaviour and whether policies or staff training need updating to reduce risk
- Stay alert to the subtle signs of sexual violence and show sensitivity to victims' needs
- Recognise that some groups, such as girls, children with special educational needs and/or disabilities (SEND), and LGBTQ+ children, may be at greater risk

Staff should also:

- Challenge any inappropriate behaviour
- Make it clear that sexual violence and harassment are unacceptable, will never be tolerated, and are not a normal part of growing up
- Act firmly against physical behaviours that may be criminal, such as grabbing, pulling down clothing, flicking bras, or lifting skirts, as tolerating these risks normalising abuse

If staff have concerns or receive a report of sexual violence or harassment, they must follow the safeguarding procedures outlined in this policy without delay.

18. Specific Safeguarding Issues – Serious Violence

Indicators a child may be at risk of, or involved in, serious violent crime include:

- Increased absence from school
- Changes in friendships or relationships, especially with older individuals or groups
- Significant decline in academic performance
- Signs of self-harm or noticeable changes in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (may indicate involvement with criminal networks or gangs)

Risk factors increasing likelihood of involvement in serious violence include:

- Being male
- Frequent absences or permanent exclusion from school
- History of child maltreatment
- Previous involvement in offences such as theft or robbery

Staff must be vigilant to these signs and report concerns immediately to the Designated Safeguarding Lead (DSL).

19. Specific Safeguarding Issues – Fabricated or Induced Illness (FII)

FII is a form of abuse where a parent or carer deliberately causes or fabricates symptoms of illness in a child to convince others that the child is ill. This can cause:

- Physical harm through unnecessary medical interventions or induced illness (e.g., poisoning, suffocation)
- Disruption to the child's development and daily life, including school absence and social isolation
- Psychological harm, where the child may be confused, anxious, or colluding with the parent/carer

Staff working closely with children should be alert to inconsistencies between what is reported about the child's health and their actual presentation. Concerns should be discussed with the DSL and reported according to safeguarding procedures. Always assess if the child is in immediate danger.

20. Specific Safeguarding Issues – Misuse of Drugs or Alcohol

Children Misusing Drugs or Alcohol

Substance misuse by a child is not automatically a child protection issue, but action will be considered if:

- The misuse makes the child vulnerable to other abuse (e.g., sexual abuse)
- The behaviour is a result of abuse or coercion, particularly by adults
- There is suspected parental substance misuse impacting the child
- The misuse raises urgent health or safeguarding concerns
- The child is at risk due to criminal activity linked to substances

Any concerns should be reported to the DSL for further assessment and action.

Children Living with Substance Misusing Parents/Carers

Parental misuse of drugs and/or alcohol is strongly linked to Significant Harm to children, especially when combined with other risks such as domestic violence.

When the school or provision receives information about substance misuse by parents or carers, it will follow safeguarding procedures to protect the child.

Key risk factors to consider include:

- Family resources diverted to finance the parent's substance dependency, resulting in inadequate food, heating, or clothing for the children
- Children exposed to unsuitable caregivers or visitors, such as drug dealers or customers
- Parental alcohol misuse causing inappropriate sexual or aggressive behaviour in the home
- Chaotic substance use leading to emotional unavailability, irrational behaviour, and reduced parental vigilance
- Disturbed moods in the parent due to withdrawal symptoms or dependency
- Unsafe storage of drugs, alcohol, or injecting equipment accessible to children
- Substance misuse impacting the growth and development of an unborn child

Staff must be alert to these indicators and report concerns to the Designated Safeguarding Lead (DSL) to ensure timely intervention and safeguarding support.

21. Specific Safeguarding Issues - FGM

Female Genital Mutilation (FGM) refers to all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons, as defined in *Keeping Children Safe in Education (KCSIE)*.

FGM is a criminal offence in the UK and is recognised as a form of child abuse with severe and long-lasting physical and emotional consequences. It may also be referred to as ‘female genital cutting’, ‘circumcision’, or ‘initiation’.

The DSL will ensure staff receive appropriate training to recognise and respond to children affected by or at risk of FGM.

Signs that FGM may have already taken place include:

- A pupil confiding in a trusted adult that FGM has occurred
- A mother or family member disclosing that FGM has been performed
- The family or pupil being known to social services for safeguarding concerns
- A girl experiencing one or more of the following:
 - Difficulty walking, sitting, or standing, or appearing uncomfortable
 - Sudden difficulty sitting still for long periods (when this was not previously an issue)
 - Spending unusually long periods in the bathroom or toilet due to painful urination
 - Frequent urinary, menstrual, or stomach problems
 - Avoidance of physical exercise or missing PE lessons
 - Repeated or prolonged absences from school
 - Increased emotional or psychological distress, such as withdrawal or depression, or significant behavioural changes
 - Reluctance to undergo medical examinations
 - Seeking help but not being explicit about the issue
 - Talking about pain or discomfort in the genital area

Potential indicators that a girl may be at risk of FGM include:

- A family history of practicing FGM (the most significant risk factor)
- FGM being known to occur within the girl’s community or country of origin
- Concern expressed by a parent or family member that FGM may be carried out
- Families who do not engage with professionals or who are already known to social care for safeguarding issues
- A girl who:
 - Has a mother, older sibling, or cousin who has undergone FGM
 - Has limited integration within UK society
 - Confides she is due to have a “special procedure” or attend a special occasion to “become a woman”
 - Mentions a long holiday to a country where FGM is prevalent, or parents/carers plan to take her abroad for a prolonged period

- Requests help from a trusted adult because she suspects or knows she is at immediate risk of FGM
- Talks about FGM in conversations, possibly telling other children (context should be considered)
- Is unexpectedly absent from school
- Has gaps in her child health record or attends travel clinics for vaccinations or anti-malarial medication

These indicators are not exhaustive but provide key signs to watch for.

Mandatory Reporting Duty for Teachers

Any member of staff who:

- Is told by a girl under the age of 18 that she has undergone FGM; or
- Observes physical signs indicating that FGM has been carried out on a girl under 18, and has no reason to believe the procedure was necessary for medical reasons (such as childbirth or health care),

must report this to the police immediately by making a direct and personal report. This is a legal obligation under the FGM Act 2003 and Serious Crime Act 2015. Failure to comply with this statutory duty may result in disciplinary action.

Where it is appropriate and not prohibited by the circumstances, the staff member should also consult the Designated Safeguarding Lead (DSL) and make a referral to children's social care in line with local safeguarding procedures.

Where FGM Is Suspected or a Pupil Is at Risk

If a member of staff suspects that a pupil may be at risk of FGM or has concerns that FGM may have been carried out (but no direct disclosure or observable evidence is present), they must not conduct any form of examination. Instead, the concern must be reported immediately to the DSL.

Concerns involving pupils aged 18 or over must still be taken seriously. Any such disclosures or suspicions must also be discussed with the DSL and followed up in accordance with NewHeart Learning's safeguarding procedures and local authority guidance.

So-called 'Honour-Based' Abuse (including FGM and Forced Marriage)

So-called 'honour-based' abuse (HBA) refers to incidents or crimes committed to protect or defend the perceived honour of a family or community. This includes practices such as female genital mutilation (FGM), forced marriage, and breast ironing.

Abuse in the Context of Honour-Based Abuse (HBA)

Abuse linked to HBA often involves wider family or community pressure and may include multiple perpetrators. All forms of HBA are considered abuse and will be treated and escalated accordingly. All staff should remain vigilant to the possibility that a child may be at risk of, or already experiencing, HBA. Any concerns should be raised immediately with the Designated Safeguarding Lead (DSL), who will activate local safeguarding procedures.

If You Have Concerns About a Child

(Where there is no immediate danger or risk of significant harm)

If you are concerned about the wellbeing of a child but do not believe they are in immediate danger or at risk of significant harm, you should, wherever possible, consult with the Designated Safeguarding Lead (DSL) in the first instance to determine the most appropriate course of action.

In exceptional circumstances, where neither the DSL nor Deputy DSL is available, this should not delay action being taken. In such cases, you should seek advice from **Cambridgeshire Children's Social Care** or contact the **NSPCC helpline** on **0808 800 5000**.

If you do take any action independently, including making a referral, you must inform the DSL as soon as possible and ensure all actions are appropriately recorded.

22. Specific Safeguarding Issues – Forced Marriage

Forced marriage is a criminal offence. It occurs when one or both parties do not consent freely to the marriage and coercion, violence, threats, or emotional pressure are used to force the marriage. Physical, emotional, or psychological threats all qualify. It is also illegal to cause anyone under 18 to marry, regardless of consent or coercion.

Staff will receive training on forced marriage and its warning signs. We recognise the importance of the 'one chance' rule—there may be only one opportunity to speak to a potential victim and intervene.

If staff suspect a pupil is at risk of forced marriage, they should talk to the pupil in a private and safe setting and then immediately report their concerns to the DSL.

The DSL will:

- Speak with the pupil privately to understand the concern
- Activate local safeguarding protocols and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit (phone: 020 7008 0151; email: fmu@fco.gov.uk)
- Refer the pupil to appropriate school support such as an education welfare officer, pastoral tutor, learning mentor, or counsellor

23. Specific Safeguarding Issues – Radicalisation

Preventing Radicalisation

Radicalisation is the process by which a person comes to support or engage in terrorist violence. Extremism is the promotion of ideologies based on violence, hatred, or intolerance that seek to:

- Undermine or destroy the fundamental rights and freedoms of others
- Overturn or replace the UK's system of liberal parliamentary democracy and democratic rights
- Create a permissive environment for the above aims

Terrorism involves actions that:

- Endanger or cause serious violence to people
- Cause serious damage to property
- Seriously disrupt electronic systems

Terrorism is carried out to influence the government or intimidate the public for political, religious, or ideological reasons.

Schools have a legal duty to prevent children from being drawn into terrorism. The DSL will complete Prevent awareness training and ensure staff have access to suitable training to identify children at risk.

We will assess the risk of radicalisation among our pupils based on local intelligence, working closely with safeguarding partners and the police.

Appropriate internet filtering will be in place, and students will be supported to stay safe online both at school and home.

No single profile identifies a child vulnerable to radicalisation; it can happen quickly or gradually. Staff will stay alert for changes in behaviour.

Signs a pupil may be radicalised include:

- Refusing to engage or becoming hostile towards peers who are different
- Becoming drawn to conspiracy theories or feeling persecuted
- Changing friendship groups or appearance
- Rejecting activities they previously enjoyed
- Converting to a new religion suddenly
- Isolating themselves from family and friends
- Speaking as if delivering a scripted message
- Unwillingness or inability to discuss their views
- Displaying disrespectful or angry attitudes towards others
- Increasing secretiveness, especially online
- Expressing sympathy for extremist ideas or groups, or justifying their actions
- Accessing extremist content online or possessing extremist literature
- Contact with extremist recruiters or trying to join extremist groups

Children vulnerable to radicalisation may have low self-esteem or be victims of bullying or discrimination. Many signs can overlap with normal adolescent behaviour. Staff should trust their instincts and seek advice if concerned. **Staff must always act if worried.**

Concerns Related to Extremism and Radicalisation

If you suspect that a child may be at risk of radicalisation or being drawn into extremist ideologies, but there is no immediate risk of harm, you should first speak to the DSL to determine the most appropriate course of action.

In situations where neither the DSL nor Deputy DSL is available, do not delay. You may:

- Seek guidance from Children's Social Care.
- Make a direct referral if deemed necessary.
- Inform the DSL of any action taken as soon as possible and ensure a written record is made.

The DSL will assess the level of risk and determine whether a referral should be made to:

- **The police,**
- **Children's Social Care,** or
- **Channel** – the government's programme for identifying and supporting individuals at risk of radicalisation or involvement in terrorism.

For non-urgent concerns, you may also contact the **Department for Education's counter-extremism helpline** on **020 7340 7264**, or email **counter.extremism@education.gov.uk**.

In an emergency, contact 999 or the Anti-Terrorist Hotline on 0800 789 321 if you:

- Believe someone is in immediate danger;
- Suspect someone is planning to travel to join an extremist group;
- See or hear something that may be related to terrorist activity.

24. Bullying, Peer Abuse and Gang Association

NewHeart Learning recognises that bullying, peer-on-peer abuse and gang association are safeguarding matters and will be treated as such. In line with Department for Education statutory guidance *Keeping Children Safe in Education (KCSIE)*, we understand that harmful behaviours between children can be both online and offline and may include intimidation, coercion, physical aggression, emotional harm, discriminatory behaviour, sexual harassment, exploitation or pressure linked to gang involvement.

We acknowledge that pupils with SEMH needs and those experiencing emotionally based school avoidance may be particularly vulnerable to peer influence, exploitation or targeting. All concerns relating to bullying, suspected gang association, child criminal exploitation (including county lines), or coercive group behaviour will be recorded and responded to in accordance with our Safeguarding procedures and risk assessment processes. Where appropriate, external agencies will be consulted to ensure early intervention and protection.

NewHeart Learning maintains a clear and robust Anti-Bullying Policy which outlines preventative education, reporting mechanisms, restorative approaches and graduated sanctions. The Anti-Bullying Policy should be read alongside this Safeguarding Policy. Any incident that indicates risk of significant harm, exploitation or ongoing coercion will be escalated to the Designated Safeguarding Lead (DSL) immediately and managed under child protection procedures rather than solely behaviour systems.

25. Early Help Assessment

Where concerns do not meet the threshold for immediate safeguarding intervention but indicate that a child or family would benefit from additional support, an Early Help Assessment may be initiated.

The DSL will typically take the lead in coordinating with other relevant agencies and arranging an inter-agency assessment. However, members of staff may also be required to support, or in some cases act as, the lead practitioner for the Early Help process.

NewHeart Learning Ltd will work in collaboration with statutory safeguarding partners to determine the appropriate level of support, in line with local thresholds and the Cambridgeshire and Peterborough Safeguarding Children Partnership guidance.

All cases will be regularly reviewed by the DSL. If concerns persist or escalate, the school will consider making a formal referral to Children's Social Care. The DSL will monitor the timeliness and impact of interventions, ensuring that children and families receive the support they need without delay.

26. Referrals

Referrals to Children's Social Care or the Police

If it is determined that a case meets the threshold for referral to Children's Social Care or the police, the Designated Safeguarding Lead (DSL) will either make the referral directly or support the referring staff member to do so.

In the event that a staff member makes a referral independently, they must:

- Inform the DSL at the earliest opportunity.
- Accurately record the concern, actions taken, and any communication with external agencies.

Once the referral is submitted, the local authority must respond within one working day and provide feedback on the outcome and next steps. The DSL, or the staff member who made the referral, is responsible for following up with the local authority if this information is not received and for ensuring that all outcomes are appropriately documented.

If the situation for the child does not appear to be improving, the DSL or referrer must follow local escalation procedures to ensure that the concern is addressed, and the child's welfare is prioritised.

27. Mental Health and Safeguarding

Mental health difficulties may, in some instances, be an indicator that a child has experienced or is at risk of abuse, neglect, or exploitation.

Staff must remain vigilant to changes in a child's behaviour that may signal underlying mental health concerns or vulnerabilities.

- Where a mental health concern is linked to a safeguarding issue, staff must follow the procedures outlined in the safeguarding policy and raise the concern immediately with the DSL.
- Where the concern is not related to safeguarding, the DSL should still be informed to decide the appropriate response or support required.

NewHeart Learning Ltd follows the guidance outlined in the Department for Education's guidance on mental health and behaviour in schools, and works closely with parents, carers, and external professionals to support the wellbeing of all pupils.

28. Concerns and Allegations

Concerns About a Member of Staff, Supply Teacher, Volunteer, or Contractor

If you have a concern about the behaviour of a member of staff, including a supply teacher, volunteer, or contractor, or if an allegation is made that any adult working with children may pose a risk of harm, you must report this to the Designated Safeguarding Lead (DSL) immediately.

If the concern involves the DSL or the Deputy DSL, the matter must be reported directly to the Local Authority Designated Officer (LADO) without delay.

All concerns must be taken seriously, handled sensitively, and referred in accordance with statutory guidance and local authority procedures. The confidentiality of all parties must be respected throughout the process, and detailed records must be kept.

Allegations of Abuse Made Against Other Students

NewHeart Learning Ltd recognises that children can abuse other children, and such behaviour will never be tolerated or dismissed as “banter,” “part of growing up,” or “just having a laugh.”

We are aware that child-on-child abuse can be gendered in nature, but all forms of abuse between students—regardless of gender or background—are taken seriously. We are committed to creating a safe and respectful environment for every pupil.

This policy applies where alleged behaviour:

- Is serious and may constitute a criminal offence;
- Could place other students at risk;
- Involves violence or threats of violence;
- Includes coercion, particularly involving drugs or alcohol;
- Involves sexual harassment, sexual abuse, indecent exposure, upskirting, or the non-consensual sharing of sexualised images (including “nudes” or “semi-nudes”).

Responding to Allegations of Child-on-Child Abuse

If a pupil discloses abuse by another pupil:

- Do not investigate the allegation yourself.
- Record the disclosure factually and report it to the DSL immediately.
- The DSL will refer the matter to Children’s Social Care and, where necessary, to the police.
- A risk assessment and support plan will be put in place for all students involved—both alleged victim(s) and alleged perpetrator(s)—to ensure safety and appropriate support.
- If necessary, the DSL will liaise with CAMHS or other relevant mental health professionals to support the wellbeing of those affected.

Where the incident constitutes a criminal offence and police involvement causes delay, the DSL will continue to act in the best interest of the students, including implementing appropriate protective and disciplinary measures, and will maintain open communication with the police and other agencies as needed.

All concerns must be recorded in writing before staff leave the site at the end of the school day.

29. Creating a Supportive Environment and Minimising the Risk of Child-on-Child Abuse

At NewHeart Learning, we are committed to fostering a culture of respect, openness, and safety, where all students feel secure and confident in reporting concerns. We take a proactive approach to preventing child-on-child abuse and recognise the importance of a supportive environment that empowers victims to speak out.

To promote this environment and reduce risk, we will:

- Challenge all inappropriate behaviour between students, including the use of derogatory or sexualised language and the requesting or sharing of sexual images.

- Remain alert to gender-specific risks, such as unwanted or aggressive physical contact directed at female students, and initiation or hazing behaviours that may affect boys.
- Embed education on respectful behaviour and consent within our curriculum, ensuring students understand appropriate boundaries in relationships.
- Provide accessible and well-promoted reporting systems, so that all students can report abuse or concerns safely and with confidence.
- Reassure victims that they will be taken seriously and treated with dignity and sensitivity at all times.
- Monitor for patterns or repeated reports of sexual harassment or violence, and where necessary, address systemic or environmental issues by reviewing relevant policies, procedures, and the curriculum.
- Support all children affected by incidents, including those who have witnessed sexual violence. We will take steps to prevent any bullying or intimidation of victims, alleged perpetrators, or witnesses.
- Consider the impact of intra-familial abuse and offer appropriate support to siblings or other affected family members.

Staff Training and Responsibilities

All staff at NewHeart Learning receive safeguarding training in line with statutory guidance from the Department for Education and are required to **read, understand and adhere to** this Safeguarding & Child Protection Policy, the Staff Code of Conduct, and associated safeguarding procedures at all times. Compliance with this policy forms part of all staff members' professional duties and contractual responsibilities.

All staff will be trained to understand:

- How to identify the signs and indicators of child-on-child abuse and respond appropriately.
- That even in the absence of specific disclosures, abuse may still be occurring staff are expected to maintain a "it could happen here" mindset.
- That children may indirectly communicate distress, and staff should respond to signs such as changes in behaviour, overheard conversations, or concerns raised by peers.
- That vulnerable pupils including those with disabilities, those from minority backgrounds, or those with diverse sexual or gender identities may face additional barriers to reporting abuse.
- That children who harm their peers may themselves be experiencing abuse, and such behaviour falls within the scope of this policy.
- Their responsibility to act immediately on concerns rather than waiting for a formal disclosure.
- That social media can amplify the impact of incidents and may be used to harass or contact involved parties after an incident has occurred.
- The importance of reporting all concerns to the Designated Safeguarding Lead (DSL) without delay.

Responding to Incidents and Taking Disciplinary Action

The DSL will lead on decisions regarding disciplinary action against alleged perpetrators. Support will be provided to all students involved throughout this process, regardless of any external investigations.

Disciplinary action may proceed concurrently with investigations conducted by the police or other agencies, provided this does not compromise those investigations. The provision is not bound by the

outcome of external investigations and may reach its own conclusions about incidents for the purpose of safeguarding and maintaining a safe environment.

Each case will be considered individually, taking into account:

- Whether proceeding with internal disciplinary action could prejudice an external investigation or prosecution—decisions will be made in consultation with the police and/or local authority children's social care.
- Whether there are exceptional circumstances that make it unreasonable or impractical for the provision to determine its own conclusions while another investigation is ongoing.

30. Sharing of Nudes and Semi-Nudes ('Sexting')

Guidance informed by the UK Council for Internet Safety (UKCIS)

NewHeart Learning Ltd takes incidents involving the consensual or non-consensual sharing of nude or semi-nude images and videos (also referred to as 'sexting' or 'youth-produced sexual imagery') extremely seriously. This includes any imagery that appears to be photographic or video content, even if computer-generated (pseudo-images).

Staff Responsibilities in Responding to an Incident

If a member of staff becomes aware of an incident involving the sharing of nudes or semi-nudes, they must immediately report it to the Designated Safeguarding Lead (DSL).

Staff must not:

- View, copy, print, save, store, or share the image or video in any way, or ask a student to share or download it.

(If an image is viewed accidentally, it must be reported to the DSL immediately.)

- Delete the image or instruct the student to delete it.
- Ask the student(s) involved to disclose information about the content—this is the responsibility of the DSL.
- Discuss the incident with other students, staff, or parents/carers unless authorised to do so.
- Shame, blame, or make any student feel guilty or responsible.

Staff should explain to the pupil(s) that the incident must be reported and that they will receive appropriate support.

Initial Review by the DSL

Upon receiving a report, the DSL will hold an initial review meeting with appropriate staff (such as the person who reported the incident and/or the safeguarding team). This meeting will consider:

- Whether any pupil is at immediate risk.
- Whether a referral to the police or children's social care is necessary.
- Whether it is essential to view the image in order to safeguard a child *(in most cases, this is not required or recommended)*.
- How widely the image may have been shared and via which platforms.
- What additional information may be required to determine the appropriate course of action.
- Whether the image(s) or video(s) can or should be removed from devices or online platforms.
- Any key contextual information about the pupils involved that may influence risk assessment.
- Whether another school, setting, or individual needs to be contacted.

- Whether and when to inform the pupils' parents or carers (*in most cases, parents/carers will be informed*).

When to Refer Immediately to the Police and/or Children's Social Care

A referral must be made immediately if:

- An adult appears to be involved (e.g. posing as a child to groom or exploit a young person).
- There is reason to believe coercion, blackmail, grooming, or lack of consent is involved—particularly for students with Special Educational Needs (SEN).
- The imagery includes violent or developmentally inappropriate sexual content.
- The imagery features sexual activity involving anyone under the age of 13.
- A child is at immediate risk of harm (e.g. experiencing suicidal thoughts or self-harm related to the incident).

If none of the above apply, the DSL may decide it is appropriate to manage the incident internally, in line with safeguarding procedures. The decision must be clearly recorded.

Further DSL Review

Where no external referral is made at the initial stage, the DSL will carry out a further risk assessment. This may involve speaking with the students involved (if appropriate) to gather more information.

If, at any point, there is concern that a child has been harmed or is at risk of harm, the DSL will make an immediate referral to the appropriate external agency.

Parental Involvement

Parents or carers will usually be informed at the earliest possible stage and kept involved throughout, unless doing so would put the student at further risk.

Police Involvement

Where a referral to the police is required, this will be done by dialling **101**, and a record of the conversation and outcome will be maintained by the DSL.

Recording Incidents

All incidents involving the sharing of nudes or semi-nudes, along with decisions taken and actions implemented, must be thoroughly and accurately recorded.

Curriculum Education and Prevention

As part of our PSHE curriculum, students are taught about:

- What constitutes nude and semi-nude imagery and how it may be encountered.
- The legal and personal consequences of creating, forwarding, or possessing such content.
- How sharing this content may be considered abusive or classed as online sexual harassment.
- The impact such behaviour can have on feelings, relationships, and reputations.
- Strategies for resisting pressure to send or share such content and how to respond if they receive it.

This policy is shared with students, ensuring they are aware of what will happen if an incident occurs and feel confident in seeking help.

Teaching Best Practice

Our educational approach ensures:

- Safeguarding remains the priority.

- Content is delivered with a child-centred perspective.
- Lessons promote open discussion and critical thinking.
- Students are empowered with knowledge and confidence to make safe decisions.
- Victim-blaming attitudes are actively challenged.
- Content is never frightening, shaming, or demoralising in nature.

31. Reporting Systems for Students

At NewHeart Learning, we take every safeguarding concern seriously and will always consider the child's wishes and feelings when deciding what action to take and what support to provide. Clear information on how students can raise a concern is included in the Student Handbook, which each pupil receives during induction. The handbook is reviewed and updated annually, then reissued to all students.

We understand how important it is for students to feel safe, listened to, and confident in coming forward with any worries, concerns, or allegations. To support this, we will:

- Provide clear, accessible systems for students to report abuse or concerns.
- Ensure these systems are well-promoted, easy to understand, and easy to use.
- Make it clear to students that all concerns will be taken seriously.
- Provide reassurance that they can express their views freely, be listened to, and give feedback without fear.

The Designated Safeguarding Lead (DSL) and Deputy DSL are committed to ensuring that students feel safe and supported in sharing their concerns. Students will always have the opportunity to speak in a private, confidential space, and will receive reassurance and guidance following any disclosure.

32. Online Safety and the Use of Mobile Technology

At NewHeart Learning, we recognise the importance of protecting children from harmful and inappropriate online material. We understand that technology plays a significant role in many safeguarding and wellbeing issues, and we are committed to creating a safe online environment for our students, staff, and volunteers.

Our aims are to:

- Maintain robust filtering and monitoring systems to ensure the online safety of all within our provision.
- Promote the safe and responsible use of technology, including mobile and smart devices (referred to as 'mobile phones').
- Set clear, consistent guidelines for mobile phone use across the school community.
- Have clear procedures for identifying, responding to, and escalating online safety incidents or concerns.

The Four Key Categories of Online Risk

Our approach to online safety addresses the following risk areas:

- **Content** – Exposure to illegal, inappropriate, or harmful material (e.g. pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism).
- **Contact** – Harmful online interactions, such as peer pressure, targeted advertising, or adults posing as children to groom or exploit.

- **Conduct** – Online behaviour that increases the risk of harm, including creating or sharing explicit images, online bullying, or other unsafe activity.
- **Commerce** – Risks including online gambling, inappropriate advertising, phishing, and financial scams.

How We Address These Risks

We will:

- Educate students through the curriculum on topics such as safe social media use, keeping personal information private, recognising unacceptable online behaviour, and how to report cyberbullying (including when they are a witness).
- Train staff during induction and at least annually on online safety issues, including cyberbullying, radicalisation risks, and the use of filtering and monitoring systems.
- Work with parents/carers by sharing guidance on our website, in communications, and during meetings, including how they can raise concerns about online safety.
- Set clear rules for staff mobile phone use:
 - Personal phones may be brought to work but used only during non-contact times.
 - Staff must not take photos or videos of students on personal devices.
- Require all students, parents/carers, staff, and volunteers to sign our Acceptable Use Agreement for internet and mobile phone use.
- Explain sanctions for breaches of our Acceptable Use policy.
- Make clear that staff have the authority to search student devices in line with DfE guidance on searching, screening, and confiscation.
- Review filtering and monitoring systems annually to ensure ongoing protection from the four key risk areas.
- Provide regular safeguarding updates for staff, including online safety, at least once per year.
- Review our safeguarding and child protection policy annually to ensure our online safety approach remains up to date and effective.

33. Notifying Parents or Carers

Where it is appropriate to do so, concerns about a child will be discussed with their parents or carers. In most cases, this will be done by the Designated Safeguarding Lead (DSL) following a suspicion or disclosure.

Other staff members will only speak to parents or carers about safeguarding concerns after consulting with the DSL.

If we believe that informing a parent or carer may increase the risk to the child, the DSL will seek advice from the local authority children's social care team before making contact.

In cases where allegations of abuse are made against another child, we will usually notify the parents or carers of all children involved. We will carefully consider what information is shared about the other child and the timing of this communication, working closely with the police and/or children's social care to ensure our approach is appropriate and consistent.

The DSL, in consultation with any relevant agencies (decided on a case-by-case basis), will:

- Meet with the victim's parents or carers, alongside the victim, to explain safeguarding measures being put in place, understand the child's wishes regarding support, and clarify how the report will be handled.
- Meet with the alleged perpetrator's parents or carers to outline what support is available for them, explain any changes or restrictions affecting their child (e.g. timetable adjustments or separation from the victim), and provide the reasons for these decisions.

34. Students with Special Educational Needs, Disabilities, or Health Issues

At NewHeart Learning, we recognise that pupils with SEND or certain health conditions may face additional safeguarding challenges. Research shows that children with disabilities are at greater risk of abuse than their peers, and we remain vigilant to these vulnerabilities.

We understand that additional barriers may exist when identifying abuse, exploitation, or neglect in this group, including:

- Making assumptions that changes in behaviour, mood, or physical presentation are solely related to the child's condition without further investigation.
- A higher risk of peer isolation or bullying, including prejudice-based bullying.
- Disproportionate impact from negative behaviours such as bullying, even when there are no obvious outward signs.
- Communication barriers, making it more difficult for students to express concerns or seek help.
- Challenges with cognitive understanding — for example, difficulty distinguishing between fact and fiction in online content, or understanding the consequences of certain behaviours.

Any safeguarding concerns involving a student with SEND will be managed in close liaison between the DSL (or Deputy DSL) and the SENDCo to ensure that both safeguarding and individual learning needs are fully considered.

All staff will be familiar with the needs of the students they work with and will have access to the student's Education, Health and Care Plan (EHCP) where applicable.

35. Looked-After and Previously Looked-After Children

At NewHeart Learning, we are committed to ensuring that all staff have the knowledge, skills, and understanding needed to safeguard looked-after and previously looked-after children effectively. We will make sure that:

- Relevant staff are aware of a child's legal care status, their contact arrangements with birth parents or those with parental responsibility, and their current care arrangements.
- The Designated Safeguarding Lead (DSL) holds up-to-date details for the child's social worker and the relevant School Head.
- We work closely with School Heads to support and promote the educational achievement, progress, and wellbeing of looked-after and previously looked-after children.

36. Students with a social worker

Some students may have a social worker due to safeguarding or welfare concerns. At NewHeart Learning, we understand that experiences of adversity or trauma can increase a child's vulnerability to further harm and may also create barriers to regular attendance, learning, positive behaviour, and good mental health.

The DSL and all staff will work proactively with social workers to help safeguard and support vulnerable pupils.

Where we know a pupil has a social worker, the DSL will always take this into account when making decisions, ensuring that the child's safety, wellbeing, and educational outcomes remain the priority. This may influence decisions such as:

- How we respond to unauthorised absences or episodes of missing education when safeguarding risks are known.
- What type and level of pastoral and/or academic support we provide.

37. Complaints and Concerns about Safeguarding Policies

Complaints Against Staff

Any complaint against a staff member that may require a child protection investigation will be managed in line with our procedures for dealing with allegations of abuse against staff (see Appendix 3).

Other Complaints

NewHeart Learning takes all complaints seriously and investigates each matter individually. Any complaint relating to students or premises should be reported directly to the Director and the DSL. If the complaint involves the DSL, it should be reported to the Local Authority Designated Officer (LADO).

Full details are outlined in our Complaints Policy.

Whistleblowing

Safeguarding is everyone's responsibility. We recognise that staff may not always feel comfortable raising safeguarding concerns with someone within their immediate working environment. We also understand that if staff feel unable to speak up, students may also feel silenced.

All staff have a primary duty to safeguard the students in our care. Any concern—no matter how small it may seem—must be reported. The DSL is responsible for fostering an environment where staff feel safe to voice concerns, confident they will be listened to, and supported if concerns are raised about them.

Our Whistleblowing Policy sets out the duty of all staff to raise concerns about child protection, safeguarding, or misuse of power. Staff who raise concerns in good faith will not be penalised, and any attempt to victimise them for doing so will be treated as a disciplinary matter.

If staff do not feel able to raise concerns internally, they can contact the NSPCC Whistleblowing Advice Line for free advice and support:

- **Telephone:** 0808 800 5000
- **Email:** help@nspcc.org.uk
- **Website:** NSPCC Whistleblowing Advice Line

38. Record-Keeping

NewHeart Learning maintains safeguarding records in line with our Records Retention Schedule. All safeguarding concerns, related discussions, decisions, and the rationale for those decisions must be recorded in writing. This includes situations where a referral was made to an external agency (e.g. local authority children's social care, the Prevent programme) as well as instances where a referral was not made. If there is any uncertainty about whether to record an issue, staff should seek guidance from the DSL.

Each safeguarding record will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- Notes of any actions taken, decisions made, and outcomes reached.

Storage and access

- All safeguarding concerns and referrals will be kept in a separate child protection file for each pupil.
- Non-confidential records will be accessible as needed.
- Confidential information will be stored securely and only accessed by those with a legal or professional right to see it.
- All safeguarding records for students are stored electronically.

Retention and transfer

- Safeguarding records relating to individual pupils will be retained for a reasonable period after they leave NewHeart Learning, in line with our Data Retention Policy.
- If a pupil with current or historic safeguarding concerns transfers to another school, the DSL will securely forward their child protection file—separately from the main pupil file—within:
 - 5 school days for an in-year transfer.
 - Within the first 5 school days of the new term for a standard transition.
- Where concerns are significant or complex, and/or children's social care is involved, the DSL will also contact the DSL at the receiving school to share relevant information and ensure they are prepared to meet the pupil's needs from the point of arrival.

For further information:

- Appendix 2 sets out our record-keeping policy for recruitment and pre-appointment checks.
- Appendix 3 details our record-keeping procedures for allegations of abuse against staff.

39. Training

All staff will complete safeguarding and child protection training as part of their induction. This will include training on whistleblowing procedures and online safety, ensuring staff understand

NewHeart Learning's safeguarding systems, their responsibilities, and how to identify signs of abuse, exploitation, or neglect.

This training will be regularly updated and will:

- Be integrated into our whole-setting safeguarding approach, linked to wider staff training and curriculum planning.
- Follow guidance from the three safeguarding partners.
- Cover online safety, including staff roles and responsibilities around filtering and monitoring.
- Reflect the Teachers' Standards, supporting the expectation that all teachers:
 - Manage behaviour effectively to maintain a safe learning environment.
 - Have a clear understanding of the needs of all pupils.

All staff will also complete training on the government's Prevent strategy to identify children at risk of radicalisation or extremism and to challenge extremist views.

Safeguarding and child protection updates, including online safety, will be provided to staff as required and at least annually, through methods such as emails, briefings, or staff meetings.

Volunteers will receive appropriate safeguarding training where applicable.

Designated Safeguarding Lead (DSL) and Deputy DSL

The DSL and Deputy DSL will complete child protection and safeguarding training at least every two years. They will also update their knowledge and skills at least annually, for example through e-bulletins, networking with other DSLs, and keeping up to date with safeguarding developments. The DSL, Deputy DSL, or any designated Prevent Lead will complete in-depth Prevent awareness training, including extremist and terrorist ideologies.

Recruitment – Interview Panels

At least one member of any interview panel will have completed safer recruitment training. This training will cover, as a minimum, the requirements of *Keeping Children Safe in Education* and align with local safeguarding procedures. (See Appendix 2 for full safer recruitment procedures.)

40. Safeguarding Students Aged 18 or Over

At NewHeart Learning, our safeguarding principles apply to all students—whether they are under 18 and legally defined as children, or aged 18 and over.

For students aged 18 and above, UK legislation and safeguarding processes differ, with a stronger focus on the individual's capacity to make decisions and, in some cases, their ability to give consent to referrals.

Staff should be aware of the Mental Capacity Act and how it guides decision-making for adults who may lack capacity. Further guidance can be found here: *Mental Capacity Act: making decisions* – GOV.UK.

If a staff member has concerns about the welfare of a student aged 18 or over, they must follow the same initial procedure as for younger students and report the concern to the DSL. The DSL will then seek advice from the relevant Adult Safeguarding Board or Hub for the area where the student lives or is registered as residing.

Where there is an immediate risk of significant harm or danger to a student aged 18 or over, staff must contact the police without delay.

41. Students Who Are Lesbian, Gay, Bisexual or Gender Questioning

At NewHeart Learning, we recognise that pupils who are, or are perceived to be, lesbian, gay, bisexual, transgender, or gender questioning (LGBTQ+) may be at greater risk of being targeted by their peers and may also face a higher likelihood of experiencing poor mental health.

All safeguarding concerns relating to LGBTQ+ pupils must be reported to the DSL.

When parents/carers are making decisions about support for gender questioning pupils, they will be encouraged to seek professional clinical advice and guidance, ideally at the earliest stage—particularly when supporting pre-pubertal children.

In supporting a gender questioning pupil, we will adopt a careful and considered approach. We recognise that there are still unknowns around the long-term impact of social transition, and that some pupils may have additional vulnerabilities such as complex mental health needs, psychosocial challenges, or neurodevelopmental conditions (including autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD)).

Support will always be tailored to the individual, working in partnership with parents/carers wherever possible (except in rare cases where involving them would place the pupil at significant risk of harm). We will also take into account any clinical advice available and address wider safeguarding risks, such as the potential for bullying.

We understand that risks are heightened when pupils lack trusted adults with whom they can speak openly. Therefore, we are committed to creating an inclusive, respectful, and supportive culture where all pupils feel safe to express themselves, raise concerns, and seek help.

42. Links with other policies and procedures

This policy links to the following policies and procedures:

Attendance Policy
Behaviour Policy
Complaints Policy
Data Protection Policy
Health and Safety Policy
Online Safety Policy
Offsite Policy
Whistleblowing Policy

43. Monitoring arrangements

This policy will be reviewed annually by Daniella Hart, DSL and Head of Provision for NewHeart Learning Limited.

Date of last review:	20 February 2026
Date to review:	21 February 2027
Author:	Daniella Hart Head of Provision
Signed:	<i>Daniella Hart</i>

Appendix 1:

Types of Abuse

Abuse, including neglect, rarely happens as a single, isolated incident. In many cases, different forms of abuse overlap and occur together.

Physical Abuse

Physical abuse is any act that causes physical harm to a child. This can include hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating. It can also happen when a parent or carer deliberately causes a child to become ill or fabricates symptoms.

Emotional Abuse

Emotional abuse is the persistent maltreatment of a child that has a severe and harmful impact on their emotional development. While all forms of abuse can include an element of emotional harm, it can also happen on its own.

It may involve:

- Making a child feel worthless, unloved, or valued only when meeting someone else's needs
- Preventing a child from expressing their views or deliberately mocking how they communicate
- Imposing expectations that are not appropriate for a child's age or development, such as overprotection or limiting their ability to explore and learn
- Exposing a child to the mistreatment of others
- Serious bullying (including online), exploitation, or corruption that causes a child to feel frightened or unsafe

Sexual Abuse

Sexual abuse involves forcing or persuading a child or young person to take part in sexual activities, whether or not they understand what is happening, and whether or not violence is used.

This can include:

- Physical contact, such as rape, oral sex, sexual touching, or assault by penetration
 - Non-contact activities, such as showing sexual images to a child, making them watch sexual acts, encouraging them to behave in a sexual way, or grooming them (including online)
- Sexual abuse can be carried out by adults or other children, and can be committed by males or females.

Neglect

Neglect is the ongoing failure to meet a child's basic physical and/or emotional needs, leading to serious harm to their health or development. Neglect can start before birth, for example due to maternal substance misuse.

After birth, neglect can involve failing to:

- Provide enough food, clothing, or shelter (including excluding a child from the home or abandoning them)
- Protect a child from harm or danger
- Supervise a child adequately (including using unsuitable caregivers)



- Ensure the child receives necessary medical care or treatment
Neglect can also mean failing to respond to a child's emotional needs.

Appendix 2:

Safer Recruitment and DBS Checks – Policy and Procedures

1. Safer Recruitment Policy

Our recruitment practices follow *Part 3 of Keeping Children Safe in Education (KCSIE) 2024* to ensure we only appoint suitable individuals to work with children.

Anyone involved in recruitment will complete annual safer recruitment training.

2. Recruitment and Selection Process

Advertising Roles

Job adverts will clearly state:

- Our commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding responsibilities and level of contact with children for the role.
- Whether the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order (1975, 2013, 2020), with clarification on *protected* spent convictions/cautions.

Application Forms

All application forms will:

- State it is an offence to apply for the role if barred from engaging in regulated activity with children (where relevant).
- Include our Safeguarding Policy and Employment of Ex-offenders Policy (or a link to them).

Shortlisting

- At least two members of staff, one of whom has completed Safer Recruitment Training, will be involved in the shortlisting process.
- We will check for inconsistencies, gaps in employment, and unexplained changes of job/location.
- Shortlisted candidates will:
 - Complete a self-declaration of any criminal record, barred list status, teaching prohibition, or relevant overseas offences.
 - Sign to confirm accuracy of the information.
- We may conduct online searches as part of due diligence, informing candidates in advance.

References

Before making an offer, we will:

- Obtain at least two professional references, including one from the current or most recent employer and one from working with children.
- Verify references directly with the referee.
- Refuse open (“to whom it may concern”) references.
- Check consistency with the application and resolve any discrepancies before confirming an appointment.

Interview & Selection

Interviews will:

- A panel of at least two members will conduct interviews.

- Safeguarding-related questions will be included to assess the candidate's suitability to work with children.
- Gaps in employment will be explored and clarified.
- Any frequent changes of employment will be discussed.
- Explore potential areas of concern to determine the candidates suitability.

3. Pre-Appointment Vetting Checks

We will record all pre-employment checks on the Single Central Record (SCR). Documents will be retained according to legal guidance.

For all new staff, we will:

- Enhanced DBS check (with children's barred list information, where applicable).
- Identity verification (e.g. original passport, driving licence).
- Right to work in the UK check.
- References (at least two, one from the most recent employer, verified by phone).
- Employment history reviewed with any gaps explained.
- Medical fitness to work declaration.
- Overseas checks where applicants have lived or worked outside the UK.
- Prohibition from teaching and/or management checks (where applicable).
- Radicalisation checks.

Definition – Regulated Activity:

Work that involves regular teaching, training, instructing, caring for, or supervising children; frequent unsupervised work with children; or intimate/personal care, even if only once.

4. Existing Staff

We may repeat all relevant checks if:

- Concerns arise about suitability to work with children.
- The individual moves into regulated activity.
- There is a break in service of 12+ weeks.

We will refer to the DBS anyone who:

- Has harmed or poses a risk of harm to a child/vulnerable adult.
- Has engaged in relevant conduct or received a conviction/caution for a barring offence.
- Meets the "harm test" and has been removed from regulated activity (or would have been if still in post).

5. Agency, Contractors, and Volunteers

Agency & Third-Party Staff

- We will require written confirmation that all required checks have been completed.
- We will verify the identity of the person presenting for work.

Contractors

- Contractors and their employees will not work unsupervised with children unless all checks are completed.
- Identity will be checked on arrival.

Volunteers

- Unchecked volunteers will never be left unsupervised or allowed to carry out regulated activity.
- Enhanced DBS with barred list check is required for all new volunteers in regulated activity.
- For other volunteers, we will risk assess whether an enhanced DBS without barred list information is necessary, and keep a record of the assessment.

Appendix 3:

Allegations of Abuse Made Against Staff

(Including Low-Level Concerns)

1. Scope

This policy applies to all staff, supply teachers, volunteers, and contractors. It covers:

- Allegations meeting the harm threshold under *KCSIE 2024, Part 4*.
- Low-level concerns that do not meet the harm threshold.

2. Allegations Meeting the Harm Threshold

An allegation meets the harm threshold if a staff member has:

1. Harmed a child or may have harmed a child.
2. Possibly committed a criminal offence against or related to a child.
3. Behaved towards a child in a way that indicates they may pose a risk of harm.
4. Behaved in a way (inside or outside work) that suggests they may be unsuitable to work with children.

If unsure, we will consult the Local Authority Designated Officer (LADO).

We will handle all allegations quickly, fairly, and consistently to protect children while supporting the staff member involved.

3. Suspension

Suspension is not automatic and will only be used where:

- A child is at risk of harm.
- The case is so serious that dismissal may be a possible outcome.
- No reasonable alternative exists.

Alternatives to suspension may include:

- Redeployment away from the child(ren) concerned.
- Adding a supervising assistant during contact with children.
- Assigning alternative duties with no unsupervised child contact.
- Moving the child(ren) to other classes (with parental consultation).

Decisions will be made in consultation with the LADO, police, and/or children's social care.

4. Outcomes of Investigations

- **Substantiated** – Sufficient evidence to prove the allegation.
- **Malicious** – Sufficient evidence to disprove and evidence of deliberate harm/deception.
- **False** – Sufficient evidence to disprove the allegation.
- **Unsubstantiated** – Insufficient evidence to prove or disprove (no guilt implied).
- **Unfounded** – No evidence or proper basis for the allegation.

5. Procedure for Managing Allegations

When an allegation is made, the Head of Provision will:

1. **Initial Enquiries** – Conduct basic fact-finding in line with local procedures.
2. **Consult the LADO** – Agree the next steps, including whether to involve police and/or children's social care.
3. **Inform the Accused** – Share concerns and likely next steps (information shared only as agreed with LADO/police/children's social care).

4. **Risk Assessment** – Decide on suspension or alternatives in consultation with relevant agencies.
5. **Wider Welfare Concerns** – If other children may be at risk (including the individual's own family), the DSL will assess and refer to children's social care if needed.
6. **Document Decisions** – Record all decisions, alternatives considered, and justifications.
7. **No Further Action** – If agreed, record the decision, notify the individual, and agree next steps.
8. **Further Action** – Implement agreed measures with LADO/police/social care.
9. **Support for Staff** – Appoint a named contact to keep the accused informed and offer appropriate support.
10. **Inform Parents/Carers** – Notify parents of the child(ren) involved as soon as appropriate, following consultation with relevant agencies. Maintain confidentiality as required by law.
11. **Ongoing Updates** – Keep parents informed about the progress of the case (in relation to their child only).
12. **Referral to DBS** – If the individual has harmed or may harm a child, or poses a risk of harm, make a referral to the DBS.
13. **Teaching Prohibition** – If an interim prohibition order is issued, suspend the individual from teaching pending a Teaching Regulation Agency investigation.
14. **Evidence Sharing** – Where police are involved, request at the outset that statements/evidence can be shared for internal disciplinary use if needed.

Additional Considerations – Supply Teachers and Contracted Staff

When concerns or allegations involve someone not directly employed by the provision (e.g., supply staff or contractors from an agency), we will follow our standard allegations procedure with these additional steps:

- Fact-finding first – We will not stop using the individual's services solely on the basis of an allegation without establishing the facts and consulting the Local Authority Designated Officer (LADO).
- Agency liaison – The Director will discuss with the agency whether to suspend the individual or redeploy them while the investigation is ongoing.
- Lead responsibility – The school will take the lead in gathering the required information and sharing it with the LADO, while fully involving the agency.
- Information sharing – We will ensure any relevant history or previous concerns known to the agency are considered, either during the allegations management meeting or by direct liaison.
- Agency awareness – We will make sure agencies understand our allegations procedure, keep them updated on relevant policy changes, and invite their HR lead (or equivalent) to meetings where appropriate.

Timescales

We aim to deal with allegations promptly and effectively:

- Unsubstantiated or malicious – resolved within 1 week.
- No formal disciplinary action required – appropriate action within 3 working days.
- Disciplinary hearing required (no further investigation needed) – held within 15 working days.

These timescales are targets, not limits. Where not met, we will act as soon as practicable.

Specific Actions

After a Criminal Investigation or Prosecution

The Director will consult the LADO to agree any further action, including potential disciplinary measures, based on information from the police or children's social care.

When an Allegation is Substantiated

If substantiated and the individual is:

- Dismissed or their services are ended,
- Resigns, or
- Otherwise ceases to work with us,

...we will refer to the Disclosure and Barring Service (DBS) to consider barring.

If the person is teaching staff, we will also consider referral to the Teaching Regulation Agency (TRA).

Returning to Work

Where a suspended staff member returns, the Director will plan the reintegration process and manage any contact with the child(ren) who made the allegation.

Unsubstantiated, Unfounded, False or Malicious Allegations

If an allegation is found to be:

- Unsubstantiated, unfounded, false or malicious. The DSL/LADO and Director will decide next steps, which may include a referral to children's social care if the allegation was a possible cry for help.
- Deliberately invented or malicious. We will consider disciplinary action against the person who made it.

Confidentiality and Information Sharing

We will make every effort to maintain confidentiality during investigations. The Director will agree with the LADO, police, and/or children's social care:

- Who needs to know and what can be shared.
- How to prevent or manage speculation, leaks, or gossip.
- Whether to provide any information to the wider community.
- How to handle press interest.

Record-Keeping

- All allegations meeting the criteria will be recorded and stored in the individual's confidential personnel file for the duration of the case.
- If an allegation is proven **malicious or false**, records will be deleted unless the individual consents to retention.
- For all other allegations, we will retain:
 - A clear summary of the allegation.
 - Details of how it was investigated and resolved.
 - Notes of actions, decisions, and the outcome.
 - A statement on whether the matter will be referenced in future employment references.
- Records will be kept until normal pension age or 10 years from the allegation date (whichever is longer).
- A copy will be shared with the individual, subject to police or children's social care agreement.

References

When providing references, we will:

- **Not** include allegations found to be false, unfounded, unsubstantiated, or malicious (including repeated allegations of the same nature with those outcomes).
- Include substantiated allegations only if the information is factual and free from opinion.

Learning Lessons

For substantiated allegations, the Director will review the case with the LADO to identify improvements in policy or practice. This may include:

- Reviewing the justification and duration of any suspension.
- Considering alternatives to suspension in similar future cases.

For all other cases, the case manager will review the facts to identify possible improvements.

Non-Recent Allegations

- Allegations from a child, regardless of when the incident occurred, will be reported to the LADO in line with local procedures.
- Adults reporting abuse they suffered as a child will be advised to contact the police.

Section 2: Concerns Below the Harm Threshold

This section is based on *Part 4, Section 2 of Keeping Children Safe in Education* and applies to all concerns or allegations about staff, including supply teachers, volunteers, and contractors, which **do not** meet the harm threshold described in Section 1.

Concerns may arise from:

- Suspicion or complaint
- A safeguarding concern or allegation raised by another member of staff
- A disclosure from a child, parent, or another adult inside or outside the provision
- Pre-employment vetting checks

We are committed to responding to such concerns promptly to protect the welfare of children.

What is a Low-Level Concern?

A low-level concern is any concern—no matter how small—that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including behaviour outside of work, and
- Does not meet the harm threshold or require referral to the Local Authority Designated Officer (LADO)

Examples include (but are not limited to):

- Being overly familiar with pupils
- Showing favouritism
- Taking photos of pupils on a personal device
- Meeting alone with a pupil in a secluded or closed space
- Humiliating pupils

Encouraging Reporting of Low-Level Concerns

We promote a culture of openness, trust, and transparency, where staff feel confident to raise low-level concerns so they can be addressed early. We do this by:

- Making sure staff understand what constitutes appropriate behaviour

- Encouraging staff to speak up about concerns in themselves or others
- Supporting self-referrals where appropriate
- Addressing unprofessional conduct early to prevent escalation
- Handling all concerns in a sensitive, proportionate way
- Using information from low-level concerns to identify any weaknesses in safeguarding practice

All staff must report low-level concerns to the DSL or Deputy DSL by the end of the working day, and the concern must be recorded.

Responding to Low-Level Concerns

Where a concern is raised by a third party, the DSL will gather any necessary evidence by speaking:

- Directly to the person who raised the concern (unless anonymous)
- To the individual involved, and any relevant witnesses

The DSL will decide on the categorisation of the behaviour and any next steps, in line with the Staff Code of Conduct. The DSL has the final decision on low-level concerns.

Recording Low-Level Concerns

Records will include:

- Details of the concern
- The context in which it arose
- Any action taken and the rationale for decisions made

Records will be:

- Kept confidential, stored securely, and compliant with the DPA 2018 and UK GDPR
- Reviewed regularly to spot any emerging patterns of inappropriate behaviour
- Retained at least until the individual leaves the school

If a low-level concern involves a supply teacher or contractor, their employer will be informed to allow patterns to be monitored.

References

Low-level concerns will **not** be included in references unless:

- They have escalated to meet the harm threshold and were substantiated, **or**
- They relate to matters that would ordinarily be referenced, such as misconduct or poor performance

Appendix 4:

Individual Safeguarding Risk Assessment

This Individual Safeguarding Risk Assessment is completed where a pupil presents with identified safeguarding vulnerabilities or contextual risks. It is overseen by the DSL and reviewed regularly in line with safeguarding procedures.

Pupil Information

Pupil Name:

Date of Birth:

Year Group:

Date Risk Assessment Completed:

DSL Responsible:

Risk Assessment Table

Identified Risk	Context / Triggers	Level of Risk (Low/Med/High)	Control Measures in Place	Further Actions Required	Review Date
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Additional Notes

- Parent/Carer informed: Yes / No
- External Agencies Involved:
- Linked to EHCP / IAEP / PEP Outcomes: Yes / No
- Next Review Date:

Date of last review:	20 February 2026
Date to review:	21 February 2027
Author:	Daniella Hart Head of Provision
Signed:	<i>Daniella Hart</i>