

# Child Protection and Safeguarding: Policy and Procedures



Approved by: CEO

Date Approved: 08.09.2023

Version Number: 5

Last Reviewed 01.09.2025

Next review due by:

1.09.2026

## Amendments to 2023 version

Section 2	Updated language to reflect that 'clinical commissioning groups' are now known as 'integrated care boards'
Section 3	<p>Added reference to the fact that some children have an increased risk of abuse, both <b>online and offline</b></p> <p>Clarified that the school will give special consideration to pupils who are missing or absent from education for prolonged periods and/or repeat occasions</p>
Section 4	Added reference to the fact that schools should have a zero tolerance culture towards transphobia
Section 4.1	All staff will be aware of online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring
Section 4.2	Added online safety, including filtering and monitoring processes, to the designated safeguarding lead's (DSL's) responsibilities
Section 4.3	<p>Added the responsibility of directors to:</p> <ul style="list-style-type: none"> <li>· Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness</li> <li>· Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards</li> <li>· Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role</li> <li>· Make sure that all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and in line with advice from the safeguarding partners</li> <li>· Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training</li> </ul>
Section 4	Added the responsibility of the headteacher to make sure that online safety training is included in staff safeguarding and child protection training

Section 7	Added a new section on artificial intelligence (AI)
Section 11	Removed reference about retaining records for allegations that involve sexual abuse
Appendix 4: specific safeguarding issues	Updated language to change 'children missing from education' to 'children who are absent from education'
Appendix 4: specific safeguarding issues – forced marriage	Added the fact that it is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used

## **B2 MENTORING– Keeping Children Safe**

B2 Mentoring takes our responsibility to safeguard children very seriously. All our staff are aware of their statutory responsibilities and know how to recognise and report safeguarding concerns, and know it is important to take appropriate action, in a timely manner, to safeguard and promote the welfare of children.

### **Our B2 Mentoring Safeguarding contact is:**

Sarah Rawet	Designated safeguarding lead for B2 Mentoring
sarah.rawet@b2mentoring.co.uk	07387 362696
Dani Ricciardi	Deputy designated safeguarding lead
dani.ricciardi@b2mentoring.co.uk	07865 792335

**To Pass your Concern to an External agency:**

**Gloucestershire MASH Team: 01452 42 6565 Option 1**

**Gloucestershire Duty Social Worker: 01452 42 6565 Option 3**

**Gloucestershire Early Help: 01452 2328071**

**Gloucestershire LADO: 01452 426320**

**Gloucestershire PREVENT Partnership Board Coordinator Tel: 01452 888766 (Jayne Putland)**

**If a child is suffering or likely to suffer from harm, or in immediate danger please contact the Police - 999**

## **Purpose**

It is the responsibility of all B2 Mentoring staff to provide effective Safeguarding and Child Protection and is an integral part of our daily practice.

In its duty to **Keep Children Safe**, this company aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding

## 1. Legislation and Guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students at B2 Mentoring
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

2

## 2. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is a persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sharing of Nudes or Semi-nudes** (previously known as sexting or youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

**Children** includes everyone under the age of 18.

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

- The Local Authority (LA)
- An Integrated Care Board (formerly clinical commissioning group) for an area within the LA
- The chief officer of Police for a police area in the LA area

### 3. Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 11)
- Are absent or missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

### 4. All Staff

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

**The organisation plays a crucial role in preventative education. This is in the context of a whole-organisational approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, transphobia, biphobia and sexual violence/harassment.**

**All Staff** will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

**All staff** will sign a declaration when they commence working with B2 Mentoring and again at the beginning of each academic year to say that they have reviewed the guidance.

All B2 Mentoring Staff will be aware of our systems which support Safeguarding, including:

- This Child Protection policy
- The system for logging safeguarding concerns
- The role and identity of the Designated Safeguarding Lead (DSL, the Behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- All staff will be aware of online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring

## **4.1 The Designated Safeguarding Lead (DSL)**

The DSL takes lead responsibility for child protection and wider safeguarding. See the front of this policy for contact details.

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

The DSL will

- Provide advice and support to other staff on child welfare and child protection matters • Take

4 part in strategy discussion and inter-agency meetings and / or support other staff to do so

- Contribute to the assessment of the child
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and / or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also liaise with local authority case managers and designated officers for child protection concerns as appropriate.

## 4.2 The Directors

The directors will approve this policy at each review, and ensure it complies with the law. Specifically:

- Receive and approve a regular report regarding Safeguarding within B2 Mentoring, as part of the standing agenda for Director meetings.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold staff to account for its implementation
- The Directors will monitor the effectiveness of this policy.
- All Directors will read [Keeping Children Safe in Education](#).
- Make sure that online safety training is included in staff safeguarding and child protection training
- Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Make sure that all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and in line with advice from the safeguarding partners
- Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

## 5. Recognising Abuse and Taking Action

B2 Mentoring Staff, volunteers and Directors must contact the DSL if they have any safeguarding concerns. This must be done in ALL situations. If the safeguarding concern is immediate they must also contact the police, calling 999

### 5.1 Safeguarding referral process

All concerns must be logged at the earliest opportunity and **must be within 24 hours** of the member of staff becoming aware of the situation. Timely information sharing is essential to effective safeguarding. The DSL then has **up to a further 24 hours** to triage the concern and agree next steps.

All staff submitting concerns must ensure the time, date, circumstances and persons present are included in the record, as well as giving exact details of what the student said is recorded. Any signs of physical injury should be indicated on the body maps. Reports should be objective and based on evidence; they should distinguish between fact, observation, allegation and opinion.

### 5.2 If a child is suffering or likely to suffer from harm, or in immediate

## **danger**

In circumstances where a child is suffering from harm, or likely to suffer from harm the member of staff should follow the guidance in Fig 1. and speak to the DSL directly without delay. Where a member of staff is unable to speak to the DSL without delay, or a member of staff believes there is the risk of immediate danger, a member of staff should make a referral to children's social care and contact the police immediately (999).

Anyone can make a referral using the following link: [Report child abuse to a local council - GOV.UK](#)

### **5.3 If a child makes a disclosure to a member of staff**

If a child discloses a safeguarding issue to a member of staff, they will:

- Listen to and believe them. Allowing them time to talk freely and without asking leading questions
- Stay calm, without showing signs of shock or upset
- Tell the child they have done the right thing in talking. They will not tell the child they should have spoken sooner

The member of staff will explain what will happen next and that they will have to pass this information on. They will not promise to keep it a secret.

The member of staff will write up their conversation as soon as possible as a safeguarding referral, in the child's own words, sticking to the facts, and without applying their own judgement to the information. Alternatively, if appropriate, the member of staff will make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, staff will not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

### **5.4 If a member of staff discovers that FGM has taken place, or a student is at risk of FGM**

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

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

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4.

#### **5.4.1 Actions to be taken by a member of staff**

**Anyone** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **student under 18** must **immediately report this to the police, personally**.

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

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

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

If you suspect or it is alleged that any of the above has happened or there is an immediate risk to a child, follow the same procedure under 'Procedure where abuse is suspected/alleged'.

If you have any queries or questions in relation to this matter, please contact a member of the safeguarding team.

## **5.5 If a member of staff has concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

All concerns should initially be completed as a safeguarding referral. If, **following the reporting of the concern**, a member of staff requires further guidance on the level of concern being raised then they will speak to the DSL to agree a course of action.

On a rare occasion, a member of B2 Mentoring staff may become aware of concerns outside of working hours. If the DSL is not available, this should not delay appropriate action being taken: The member of staff should speak to the local authority children's social care. Advice can be sought at any time from the NSPCC helpline on 0808 800 5000.

A member of staff who takes actions in circumstances where they have been unable to contact the DSL should share details of any actions taken with the DSL as soon as practically possible.

If, following advice, a referral to local authority children's social care is required, then all actions taken should be shared with the DSL as soon as possible (within 24 hours).

### **5.5.1 Early help**

Page 11 of 49

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment.

The DSL will keep the case under constant review and B2 Mentoring will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

The local authority will make a decision within 1 working day of a referral about what course of 7

action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

### **5.5.2 Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support staff involved in the case to do so.

To make an Early Help Referral, staff will contact the Multi Agency Safeguarding Hub (MASH). The MASH consultation line number is 0345 155 1071 or you can email [mashsecure@Gloucestershire.gov.uk](mailto:mashsecure@Gloucestershire.gov.uk)

## 5.6 Guidance for staff with concerns about extremism

The UK Government has defined extremism in the [Prevent strategy](#) as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces".

Where a member of staff has concerns about extremism, and a child is not suffering or likely to suffer from harm, or in immediate danger, where possible, they should speak to the DSL first to agree a course of action.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

If in exceptional circumstances the DSL is not available, staff should follow the processes already outlined above for concerns arising outside school hours or when the DSL is not available.

In an emergency, a member of staff should call 999 or the confidential anti-terrorist hotline on **0800 789 321**.

Examples of situations where a member of staff would be expected to contact 999 or the anti terrorist hotline include (but are not limited to):

- Believing someone is in immediate danger
- Believing someone may be planning to travel to join an extremist group
- Seeing or hearing something that may be terrorist-related

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

B2 Mentoring will assess the risk of children we work with being drawn into terrorism. This assessment will be based on an understanding of the potential risk in the local area, in collaboration with local safeguarding partners and local police force.

## 5.7 Guidance for staff who have a concern relating to a child's

## mental health

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

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

If a member of staff has a mental health concern about a child that is also a safeguarding concern, they should take immediate action by contacting the DSL.

Where concerns are about a child's mental health but do not form a safeguarding concern, the member of staff should first speak to the DSL to agree a course of action.

See also the Department for Education guidance on [Mental health and behaviour in schools - GOV.UK](#) for more information.

### 5.8 Concerns about a staff member, supply teacher or volunteer

Staff at B2 Mentoring are subject to a thorough interview process, in accordance with Safer Recruitment Process; however, this does not mean that a staff member should not remain vigilant and be prepared to take the appropriate action in the event that a colleague or other adult in a position of responsibility in B2 Mentoring behaves in a manner that causes concern.

Where a member of staff has concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, they should speak to the CEO.

That person will then follow the procedures set out in appendix 3, if appropriate.

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

### 5.9 Allegations of abuse made against other students

At B2 Mentoring, we recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. Such behaviour is completely against our school ethos, in which all students are able to be part of a learning community.

We also recognise the gendered nature of peer-on-peer abuse; while it may be statistically more likely for abuse to take place from males towards females, all peer-on-peer abuse is unacceptable and will be taken seriously.

This child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include incidents where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in B2 Mentoring at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of

nudes and semi-nudes

This list should not be seen as exhaustive. See Appendix 4 for more information about peer-on-peer abuse.

### **5.9.1 Procedure for dealing with allegations of peer-on-**

**peer abuse** If a student makes an allegation of abuse against another student:

- The member of staff will record the allegation and tell the DSL, but do they will not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

### **5.9.2 Creating a supportive environment in school and minimising the risk of peer-on-peer abuse**

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys

- Ensure our curriculum helps to educate students about appropriate behaviour and consent. • Ensuring students know they are able to discuss concerns with staff away from other students by repeatedly telling them this in school time.
- Ensure students are able to easily report abuse using our reporting systems (as described in section 6.12 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensuring staff are trained to understand:
  - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
  - That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff will maintain an attitude of "it could happen here"
- That victims may not always make a direct report.
- Creating a culture in which a staff member with concerns about a child's welfare will act upon them immediately rather than wait to be told. For example:

- Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of

- their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it

## **5.11 Sharing of nudes and semi-nudes**

The UK Council for Child Internet Safety (UKCCIS, 2016) defines sexting as the production and/or sharing of sexual photos and videos of and by young people who are under the age of

18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. In this section, we outline the process that staff should follow in incidents involving the transmission of sexualized imagery using technology such as mobile phones.

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

### **5.11.1 Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting involving the consensual or non consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

A member of staff:

- Must not view, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Must not delete the imagery or ask the student to delete it
- Must not ask the student(s) who are involved in the incident to disclose information regarding the imagery (this will be handled by the DSL where appropriate).
- Must not share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers unless expressly requested to do so by the DSL.
- Must not say or do anything to blame or shame any young people involved
- The member of staff should explain to the young person that they need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

### **5.11.2 Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate individuals. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services

- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved. In most cases parents should be involved.

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

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

### **5.11.3 Outcome of Review Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review. They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting the local police by dialling 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 13 of this policy also apply to recording these incidents.

### **5.11.4 Curriculum coverage**

Students are taught about the issues surrounding sharing nudes and semi-nudes as part of our 12

relationships and sex education work, where appropriate.. Teaching covers the following in relation to sharing nudes and semi-nudes:

- Definitions
- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and where it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation.
- Students also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

The structure of this policy on sharing nudes and semi-nudes is also shared with students so they are aware of the processes B2 Mentoring will follow in the event of an incident.

## 5.12 Reporting systems for our students

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

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

To achieve this, we will:

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

## 6. Online safety and the use of mobile technology

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

To address this, we aim to

- Protect and educate young people working with B2 Mentoring in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones while working with B2 Mentoring
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### The 4 key categories of risk

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

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer 13 pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such

as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing

of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

Educate students about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Make sure students understand how to keep personal information private
- Make sure students know how to recognise unacceptable behaviour online
- Informing students how to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim

Educate parents/carers about online safety via our website, communications sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present
- Staff will not take pictures or recordings of students on their personal phones or cameras

### Artificial intelligence (AI)

- Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.
- B2 Mentoring recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- B2 Mentoring will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policies.
- Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

## **Notifying Parents**

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority/children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## **7. Students with special educational needs and disabilities**

Students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We ensure that our staff are conscious of these factors when working with students at B2 Mentoring. 14

## **8. Students with a social worker**

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

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

In order to most effectively safeguard students with social care support, we will work closely with social workers and ensure that there is regular and clear communication.

## **9. Looked-after and previously looked-after children**

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

- Appropriate staff have relevant information about children's looked after the legal status of looked after children within B2 Mentoring, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

## **10. Complaints and concerns about school safeguarding policies**

### **10.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### **10.2 Other complaints**

Complaints not covered in this policy can be actioned through the B2 Mentoring Complaints policy. These include concerns raised by students. For more information, please see the B2 Mentoring Complaints Policy.

### **10.3 Whistle-blowing**

B2 Mentoring has a separate whistle-blowing policy that covers concerns regarding the way B2 Mentoring safeguards students – including poor or unsafe practice, or potential failures and is available on request. For more information, please see the Whistleblowing Policy.

15

## **11. Record-keeping**

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. This will normally be completed as a referral (see Section 3). If a member of staff is in any doubt about whether to record something, it will be discussed with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left B2 Mentoring, in line with B2 Mentoring's GDPR and Data Protection policy.

If a child for whom B2 Mentoring has, or has had, safeguarding concerns moves to another provision, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Records will be kept electronically and securely.. Where appropriate, records will also be kept as paper copies stored in locked safeguarding filing cabinet with limited access.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## **12. Training**

### **12.1 All staff training**

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety. This will ensure that they understand B2 Mentoring's specific safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be Integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners.
  - Have regard to the Teachers' standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe working environment
    - Have a clear understanding of the needs of all students

All staff will have training on the government's anti-radicalisation strategy (Prevent) to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates through emails, e bulletins, CPD sessions and staff meetings. This will also include online safety.

Contractors who are required to operate on B2 Mentoring sites will also receive safeguarding information and advice on reporting procedures.

Volunteers will receive appropriate training, if applicable.

### **13.2 The DSL and deputy DSL training**

The DSL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e- bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training

### **13.3 School Proprietor training**

All Directors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

The chair may be required to act as the 'case manager', so they will receive training in managing allegations for this purpose.

### **13.4 Recruitment – interview panels**

At least one person conducting any interview for a post at B2 Mentoring will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education 2021, and will be in line with local safeguarding procedures.

## **14. Monitoring Arrangements**

This policy will be reviewed annually by the Directors.

**The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

### **Appendix 1: types of abuse**

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be

covered by one definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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

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

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

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

## procedures

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

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

### 1. Advertising

18

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### 2. Application forms

Our application forms will:

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

### 3. Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information

Candidates will then be required to sign a declaration confirming the information they have provided is true.

### 4. Seeking References and checking employment history

- We will obtain references before the interview. Any concerns raised will be explored further with referees and candidates at interview. When seeking references, we will:
  - Not accept open references

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

## 5. Interview and Selection

When interviewing candidates, we will:

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

## 6. Pre-appointment vetting checks

We will record all information on the checks carried out in B2 Mentoring's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below

### 6.1 New Staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
  - Verify their professional qualifications, as appropriate
  - Ensure they are not subject to a prohibition order if they are employed to be a teacher
  - Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available these will include:
    - For all staff, including teaching positions: [criminal records check for overseas applicants](#)
    - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.

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

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

## **6.2 Existing Staff**

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

**We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:**

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

## **6.3 Agency and Third-party Staff**

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

## **6.4 Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at B2 Mentoring has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

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

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

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

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

We will check the identity of all contractors and their staff on arrival at B2

### Mentoring. **6.5 Trainee / Student teachers**

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

Where trainee teachers are fee-funded, we will obtain written confirmation from the training 21

provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **6.6 Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **6.7 School Directors**

In addition to the checks about for local board members, all Directors will have the following checks:

- an enhanced DBS check with barred list information.
- The chair of the board will have their DBS check countersigned by the secretary of state.

A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).

### **6.8 Staff working in alternative provision settings**

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

### **6.9 Adults who supervise on work experience**

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

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

## **Appendix 3: Allegations of abuse made against staff**

## Section 1: Managing allegations

This section of this policy applies to all current members of staff, including supply teachers or volunteers, and in all cases in which it is alleged that the person has:

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

22

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

A 'case manager' will lead any investigation. The case manager will be identified at the earliest opportunity.

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

### 1. Suspension of the accused until the case is resolved

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

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

- Redeployment with B2 Mentoring so that the individual does not have contact with the child concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in B2 Mentoring so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work on the company.

If in doubt, the case manager will seek the views from B2 Mentoring's personnel advisor and the designated officer at the local authority, as well as the police and children's social care (where they have been informed).

### 2. Definitions of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to neither prove nor disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which support the allegation being made

### 3. Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the

steps below.

- confirm children are safeguarded
- obtain the written account which has been prepared by the person to whom the allegation was made
- record details of potential witnesses
- record the details of any discussions and the rationale for any decisions that have been made about the child/member of staff

23

**The lead person for safeguarding should not at this stage:**

- investigate the allegation
- interview the child
- interview the subject
- interview potential witnesses.

They will then:

- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer. This may also include the police or children's social care services, where necessary. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate -in the circumstances described above- carefully consider whether suspension of the individual from contact with children at B2 Mentoring is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social

care.

- **If immediate suspension is considered necessary**, the rationale for this will be agreed with the designated officer and recorded. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at B2 Mentoring and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, this decision will be recorded, as well as the justification for it. It will be agreed with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

24

- **If it is decided that further action is needed**, steps will be taken, as agreed with the designated officer to initiate the necessary action in school and/or liaise with the police and/or children's social care services as appropriate
- Effective support will be provided for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support is available to individuals through trade union representatives, or colleagues.
- Parents or carers of the child/children involved about the allegation will be informed as soon as possible if they do not already know. Agreement with children's social care services and/or the police will be sought if applicable. Where an allegation is made concerning a teacher, the case manager will also inform the parents or carers of the requirement to maintain confidentiality while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- B2 Mentoring will keep the parents/carers of the child/children informed of the progress of the case and the outcome. In cases involving a criminal prosecution, B2 Mentoring will share information where there is not a criminal prosecution, including the outcome of any disciplinary process (inconfidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If B2 Mentoring is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible B2 Mentoring will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in B2 Mentoring's disciplinary process, should this be required at a later point.

#### **4. Additional considerations for supply staff**

If there are concerns or an allegation is made against someone not directly employed by B2 Mentoring, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The Directors will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of B2 Mentoring, while B2 Mentoring carries out the investigation
- We will involve the agency fully, but B2 Mentoring will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

## **5. Timescales**

25

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **6. Specific actions**

### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or B2 Mentoring ceases to use their services, or the individual resigns or otherwise ceases to provide their services, B2 Mentoring will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, B2 Mentoring will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

## **7. Individuals returning after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending B2 Mentoring.

## 8. Unsubstantiated or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, B2 Mentoring will consider whether any disciplinary action is appropriate against the individual(s) who made it

## 9. Confidentiality and information sharing

B2 Mentoring will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

26

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child /children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

## 10. Record keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any actions taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, B2 Mentoring will provide a copy to the individual, in agreement with children's social care or the police if appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

## 11. References

When providing employer references, we will:

- Not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- Include substantiated allegations, provided that the information is factual and does not include opinions

## 12. Learning lessons

After any cases where the allegations are **substantiated**, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to B2 Mentoring's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

The use of suspension when the individual is subsequently reinstated. We will consider how 27

future investigations of a similar nature could be carried out without suspending the individual

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

## 13. Non-recent allegations

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

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

Where an adult makes an allegation to B2 Mentoring that they were abused as a child, we will advise the individual to report the allegation to the police.

## Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside B2 Mentoring
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### 1. Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of B2 Mentoring may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered

serious enough to consider a referral to the designated officer at the local authority

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

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

Guidance on best practice when working with children is provided for all staff in the document: ***Belong Learning – Professional Ethics, Values and Principles for Working with Children***. All staff are required to review this document annually.

## **2. Sharing low-level concerns**

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

28

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 5.5 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in B2 Mentoring's safeguarding system
- Provide ongoing support advice and guidance to all staff on developing openness in practice

## **3. Responding to low-level concerns**

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

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

The Directors will use the information collected to categorise the type of behaviour and determine any further action, inline with B2 Mentoring's staff behaviour policy and code of conduct.

All staff are encouraged to input in the shaping and development of a culture of openness and safe practice.

## **4. Record keeping**

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

Records will be:

- Kept confidential, held securely and comply with DPA2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, B2 Mentoring will decide on a course of action, either through disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves' employment at B2 Mentoring

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified

## 5. References

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

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

29

## Appendix 4: specific safeguarding issues

This appendix is based on the advice in annex A of Keeping Children Safe in Education

### Children missing or absent from education

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

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

These include children who:

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing or absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves B2 Mentoring without a new school

being named and adhering to requirements with respect to sharing information with the local authority, when applicable, before removing a child's name from the admission register at non-standard transition points.

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

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

## **Child criminal exploitation**

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

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

Indicators of CCE can include a child:

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

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

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

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

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

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

- Having a relationship with an older person ('boyfriend' or 'girlfriend')
- Suffering from sexually transmitted infections or becoming pregnant

Where staff have a concern, they will respond in line with the procedures detailed in this policy.

31

## **Domestic abuse**

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

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

Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school before the child or children arrive at school the following day. This is the procedure where police forces are part of [Home : Operation Encompass](#) . The DSL will provide support according to the child's needs and update records about their circumstances.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy will be aware of contact details and referral routes into the local housing authority so they can raise / progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. Where staff have a concern, they will respond in line with the procedures detailed in this policy.

## FGM

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

Section 6.4 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues

32

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM

include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country

for a

prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

## Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used

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

33

If a member of staff suspects that a student is being forced into marriage, they will follow the processes outlined in this policy

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk) • Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

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

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

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people.
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

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

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

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

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

34

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

Further information on B2 Mentoring's measures to prevent radicalisation are set out in other school policies and procedures, including:

- curriculum policy
- online/e-safety policy.

## Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

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

permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 6.10 and 6.11 set out more detail about our school's approach to this type of abuse.

### **Sexual violence and sexual harassment between children in schools** Sexual violence and sexual harassment can occur:

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

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

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

35

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

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

Staff should be aware of the importance of:

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

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

### **Serious violence**

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance

- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

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

## **Checking the identity and suitability of visitors**

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

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

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

Visitors to B2 Mentoring who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; 36
- or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into B2 Mentoring any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

## **Missing students**

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

- Staff member involved contacts DSL to agree next steps and records actions as a safeguarding referral.
- Identify staff to attempt to make contact with the young person within a given time frame
- Parents / Carers (social worker if appropriate) informed.
- If child remains missing after the given time frame, then police are contacted by 101
- Process may require adapting depending on geographical location or individual student need. Welfare of child remains paramount.
- Details of incident recorded as a safeguarding referral
  - Follow-up restorative meeting with parties involved at next available opportunity

## Appendix 6: Glossary of Commonly used terms in Safeguarding

**Abuse** – A form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm.

**Advocate** – A person appointed to speak up on behalf of children, enabling them to have a voice or put their views across.

**CAFCAS** – The Children and Family Court Advisory and Support Service. A Cafcass Officer (or children and family reporter) may be appointed by a court to provide assistance in the course of action most appropriate to your circumstances and to provide a welfare report to the court.

**CAIU** – Child abuse investigation unit (Police)

**Care Order** – A court order under section 31 of the Children's Act 1989 placing a child in Local Authority care to protect the child from harm they are suffering – or may suffer – whilst under the care of his/ her parent (and/ or being beyond a parent's control).

**CEOP** – Child Exploitation and Online Protection Group

**CSPRP** – Child Safeguarding Practice Review Panel (formally Serious Case Reviews). A Multi agency review of practice which must be undertaken for every case where abuse or neglect is known or suspected and either:

- A child dies: or
- or by failing to act to A Child is seriously harmed

and there are concerns about how organisations or professionals worked together to safeguard the child. The Safeguarding Children Partnership leads them.

**Care leavers** – Those children or young people formerly in care before the age of 18 years of 37 age

**CAMHS** - Child and Adolescent Mental Health Services

**CCE (Child Criminal Exploitation)** - a term used to describe gangs or organized criminal networks involved in exporting illegal drugs into one or more areas within the UK. They are likely to exploit children and vulnerable adults to move and store the drugs. Often referred to as 'County Lines'.

**CSE (Child Sexual Exploitation)** – A form of child sexual abuse. It takes place when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity

**Child Maltreatment** – Any form of abuse or neglect of children under the age of 18 years old

**Children's Commissioner** – Promotes and protects the rights of Children and stands up for their views.

**CIC** – Child in Care

**DA** – Domestic Abuse

**DASH** – Domestic abuse, stalking, harassment and honour-based abuse risk assessment and management model

**Early Help** – Providing support as soon as a problem emerges.

**EHA (Early Help Assessment)** – Shared assessment tool used across agencies in England. Enables professionals to share an understanding of need at an early stage as a preventative tool for reducing risk

**EHCP** – Education Health Care Plan - multi agency document designed to help children with special educational needs and disabilities (SEND), and set out how services will work to meet their needs

**EPO** – An emergency protection order under Section 44 of the Children's act 1989 given Children's social Care and the Police the power to protect a child from harm by removing them to suitable accommodation (or preventing them from being removed from settings such as hospitals).

**Extremism** – A stance against the primacy of democracy and the rule of law in our society

**FASd** –(Foetal Alcohol Syndrome) - Condition affecting a child due to the consumption of alcohol by the mother during pregnancy. Treatments available to manage symptoms

**FGM** – Female Genital mutilation

**Fraser Guidelines / Gillick Competence** – The competency test resided by Lord Fraser, which laid down criteria for establishing whether a child, irrespective of age, had the capacity to provide consent to treatment (by health professionals)in specified circumstances.

**FMPO (Forced Marriage Protection Order)** – Allows police and councils to intervene to prevent a forced marriage from occurring or to help the victim of a forced marriage.

**HBA** – Honour based abuse

**ICO (Interim Care Order)** – Time-limited court order under the Children Act 1989 to be renewed by the court after no more than 8 weeks and then every subsequent 4 weeks

**ICPC (Initial Child Protection Conference)** – Multi agency meeting to analyse the information and make informed decision on necessary actions to safeguard the welfare of a child or children. Family members are present. Conferences are chaired, reports presented, and minutes are shared with all parties.

**ISI** – Independent Schools Inspectorate

38

**LA** – Local Authority

**LAC (Looked after Children)** – A term used to describe children and young people who are in the care of the local authority

**LADO (Local Authority Designated Officer)** – Responsible for managing allegation against people who work with children

**MAPPA (Multi Agency Public Protection Arrangements)** – Statutory arrangements for managing sexual and violent offenders

**MARAC (Multi-Agency Risk Assessment Conference)** – Multi agency forum that manages high risk cases of domestic abuse, stalking and Honour based abuse

**MASH (Multi Agency Safeguarding Hub)** – Joint service combining Health, Police and Social care, Child services and other organisations that act quickly and in a coordinated way to ensure that the child or adult at risk is kept safe.

**PNC** – Police National Computer

**PR (Parental Responsibility)** - A mother automatically has parental responsibility for her child from birth. A father usually has parental responsibility if he is either:

- married to the child's mother
- listed on the child's birth certificate

Parental responsibility can be applied for if you do not automatically have it.

**Prevent** – Government anti-terrorism strategy designed to stop people become terrorists or supporting terrorism

**Private Fostering** – Arrangement made without the involvement of the local authority, when a child is placed for 28 days or more in the care of someone else who is not the child's guardian. It is a criminal offence if the local authority is not notified.

**Radicalisation** – Exploitation of susceptible people who are drawn into extremist acts by charismatic individuals

**SARC** – Sexual Assault Referral Centre

**SCP** – Safeguarding Children's Partnership

**SDQ** – Strength and Difficulties

questionnaire

**Section 17** – Section of the children Act 1989 that places a duty on Local Authorities to safeguard and promote a child's welfare

**Section 47** – Where a Local Authority has reasonable cause to suspect that a child (who live or is found in their area) is suffering, or likely to suffer significant harm. It has a duty to make such enquiries that it considers necessary to decide whether to take action to safeguard and promote the child's welfare.

**Sexting** – The production and/or sharing of sexual photos/videos by young people who are under the age of 18. It also refers to youth produced imagery. It **does not** refer to the sharing of sexual photos and/or videos of under 18-year-olds by an adult. This is a form of child sexual abuse and must be referred to the Police.

**STI** – Sexually transmitted infections

**Strategy Discussion/ Meeting** – Multi agency meeting that is called when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm. Agencies include Social Care, Police, Health and other referring bodies.

**Special Guardianship** – Court order that places a child or young person to live with someone 39

other than their parents

**UKCCIS** – UK Council for Child internet Safety

**Young Carer** – A person under the age of 18 who provides (or intends to provide) care for another person (of any age).

