# Child Protection, Adult Protection & Safeguarding Policy and Procedure

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| *Version:* | 2.11 |
| *Reviewer:* | OHC&AT Safeguarding team, Laurie Cornwell |
| *Approved by:* | OHC and OHCAT Trustees |
| *Date this version approved:* | 17th October 2025 |
| *Due for review:* | Autumn 2026 |

# Child Protection, Adult Protection & Safeguarding Policy and Procedure

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## INTRODUCTION

Orchard Hill College and Academy Trust (OHC&AT) is a family of providers working for mutual benefit. We believe that together we can offer the very best for our pupils and students and for their local communities.

OHC&AT is committed to providing outstanding educational opportunities for all our pupils and students. The safety and welfare of our pupils and students is of the utmost importance. All adults working in, volunteering or visiting OHC&AT settings must protect children and vulnerable adults from abuse and be aware that any pupil or student may be abused or at risk of abuse.

This policy is based on Keeping Children Safe in Education (DfE), and is written with reference to Government guidance and law including the Safeguarding Vulnerable Groups Act (2006), the Childcare Act (2006)(as amended 2018), the Education and Training (Welfare of Children) Act 2021, Working Together to Safeguard Children (DfE), Children Missing Education (DfE), Promoting and supporting mental health and wellbeing in schools and colleges (DfE), Alternative provision (DfE), the Every Child Matters document, the Care Act (2014), the Ofsted guidance document Positive environments where children can flourish and the Department of Education advice document What to do if you're worried a child is being abused, as well as the Home Office documents Channel Duty Guidance, Prevent Duty Guidance and Criminal exploitation of children and vulnerable adults: county lines, The Human Rights Act 1998, The Equality Act 2010 and The Public Sector Equality Duty (PSED). The policy and procedure are also informed by and compliant with Local Safeguarding Children Partners' Child Protection Procedures and SCIE guidance on safeguarding of vulnerable adults.

The policy and procedure are reviewed at least annually to ensure that updates to relevant guidance are reflected and enacted across OHC&AT.

This policy was last updated in September 2025 by Suzanna Challenger (Head of Policy, Research & Reporting), Jackie Van-West (Director of Safeguarding & Wellbeing), and Laurie Cornwell (Deputy CEO).

This policy includes OHC&AT's procedures for dealing with allegations of abuse against staff, including low level concerns (pages 26-29).

The notion and practice of safeguarding underpins diverse aspects of our practice as education providers. A full list is given at the end of this document, but in particular this policy should be considered in conjunction with OHC&AT policies and procedures concerning Behaviour, Anti-Bullying, Anti-Radicalisation, Equality Diversity & Inclusion, Online Safety, Whistle-blowing, Health & Safety, Risk Assessment, Educational Visits, Attendance, Supporting Students with Medical Conditions in Education, Relationships & Sex Education, both Student and Staff Mental Wealth, Health and Wellbeing policies, Substance Misuse, Personal & Intimate Care and Missing Child. It should also be read in conjunction with school and College Safeguarding and Wellbeing Offers which gives details of the proactive and reactive safeguarding work undertaken across the organisation, including information around contextual safeguarding and any local interventions/procedures including local Suicide

Prevention Strategies, and the OHC&AT DSL Handbook. All policies and procedures are available from the OHC&AT intranet, as well as via external OHC&AT websites and/or on request.

Safeguarding is everyone's responsibility. All adults working with, or on behalf of, OHC&AT pupils and students **must always follow all of our procedures.**

As a family of specialist education providers, OHC&AT recognises that children and young people with SEND may be especially vulnerable to abuse, and that additional barriers can exist when recognising abuse and neglect in this group of children and young people. All of our working practices are designed to maximise opportunities for our pupils and students: to learn how to be and keep safe; to communicate and be understood through whichever means of communication is most effective for them; to build healthy and enriching relationships; to maximise their potential and achieve ambitious goals within their local communities. Safeguarding training delivered to all staff emphasises the need to stay alert to indicators of possible abuse, avoiding assumptions around changes in a child's behaviour or presentation relating solely to their additional needs, and understanding how communication barriers might impact on the presentation of possible abuse indicators.

## DEFINITIONS

OHC&AT adheres to the definition of safeguarding given in Keeping Children Safe in Education, along with the duty to both children and vulnerable adults that it implies:

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

- *Providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing the 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 relates to any child (under 18) who has suffered from, or may be at risk of physical injury, neglect, emotional abuse or sexual abuse.

Safeguarding relates to children, young people and vulnerable adults and means protecting their health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect, including protecting children and young people who are vulnerable or at risk of being radicalised.

OHC&AT recognises the importance of contextual safeguarding in working to ensure the safety of children, young people and vulnerable adults. We are committed to understanding the extra-familial risks that may impact upon our students' safety and

wellbeing, and to working in partnership with other local safeguarding partners to ensure that such factors are considered when action is taken to safeguard a child, young person or vulnerable adult.

Throughout this policy, 'student' is used as a term to denote both children and vulnerable adults.

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

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

## KEY POINTS

All staff must be clear about their own role and that of others in providing a caring and safe environment for all children and vulnerable adults and must know how they should respond to any concerns about an individual student that may arise. Each OHC&AT provision has a Designated Safeguarding Lead (DSL) who has overall responsibility for child protection and safeguarding. Though some of the duties inherent to this role can and will be delegated to the deputy DSL in order that work is completed most efficiently, **the ultimate responsibility remains with the DSL**. In the absence of the DSL, the deputy DSL will undertake the DSL's duties.

The OHC&AT Director of Safeguarding & Wellbeing oversees safeguarding across the organisation and acts as DSL for non-school or College-based staff. The Director of Safeguarding & Wellbeing is **Jackie Van-West**.

Each OHC&AT provision's DSL has a responsibility to:

- Liaise with the LA, Social Services, Police, Clinical Commissioning Groups (CCGs) and other agencies on individual cases of suspected or identified abuse, using that borough's referral process e.g. Multi-Agency Safeguarding Hub or similar
- Act as the contact person/s within the school/College (this may be delegated to other members of the Safeguarding Team with the approval and supervision of the Designated Safeguarding Lead).
- Oversee the Safeguarding Team, which may include Deputy DSLs, site DSLs for any satellite sites and/or Mental Health Leads.
- Be responsible for co-ordinating action within the school/College on safeguarding issues, including the proactive identification and management of early intervention.
- Lead on the development, review and implementation of the school/College's Safeguarding and Wellbeing Offer, in liaison with senior leaders, staff, students and governors.

- Liaise with staff on a 'need to know' basis so that students' rights to confidentiality are ensured.
- Represent the school/College at child protection meetings and be a member of the 'core group' if required.
- Ensure staff and visitors are familiar with this policy and procedure, Local Authority Child Protection Procedures, the LA Guidelines and relevant government guidance.
- Raise awareness about child protection and safeguarding and arrange training for staff.
- Call multi-agency Best Interest meetings where appropriate.
- Act as the first point of contact for any drug-related activity (please refer to the Substance Misuse Policy for further details).
- Refer cases to the Channel programme as required, for children or young people who have been identified as being vulnerable to becoming involved with or supporting terrorism.
- Support staff who make referrals to the Channel programme.
- Refer cases where a person is dismissed or has left due to risk/harm to a student to the Disclosure and Barring Service as required.
- Refer cases where a crime may have been committed to the Police as required.
- Be aware of students who have a social worker.
- Help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues with teachers and leadership staff.

OHC&AT DSLs undertake Level 3 training in order to undertake their roles. This training is updated at least every two years. Additional CPD includes attendance at monthly meetings of OHC&AT's in-house professional network for DSLs, the annual OHC&AT Safeguarding conference and mandatory face to face training throughout the academic year. DSLs receive regular supervision (not less than termly) from the OHC&AT Director of Safeguarding & Wellbeing and/or the OHC&AT Safeguarding Lead.

As part of our holistic approach to safeguarding, every school and the College produces a Safeguarding & Wellbeing Offer that provides further detail about the specific work, both proactive and reactive, undertaken within that provision to ensure that pupils and students are able to learn and thrive in a safe and supportive environment. These local Safeguarding & Wellbeing Offers are live documents, regularly reviewed by DSLs, Principals and Senior Leadership Teams in conjunction with the link governor for safeguarding and overseen by the OHC&AT Director of Safeguarding & Wellbeing, to ensure that the support available to students, staff and families is relevant and effective.

Early intervention is support given to children/young people and their families when a problem first emerges. Any child may benefit from early help, but all staff will be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Early intervention at OHC&AT provisions takes many forms, including home visiting programmes and school-based programmes. Further details can be found in local Safeguarding and Wellbeing Offers.

Every OHC&AT provision also has a Designated Person for Looked After Children. The Designated Person for Looked After Children works with the Virtual School Headteacher to ensure that there is a system to track and monitor the attainment and progress of Children Looked After (CLA) and Children Previously Looked After (CPLA), in order to effectively promote the educational attainment, achievement and welfare of these specific groups. Virtual School Heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of students with a social worker, as well as children in kinship care. OHC&AT is committed to providing quality education for all students based on equality of access, opportunity and outcomes.

Key roles and responsibilities within OHC&AT and individual provisions are detailed below.

**Within OHC&AT**

**Trustees will:**

- Review and approve this policy not less than annually, ensuring that it complies with the law.
- Receive termly Safeguarding data reports from the Executive Senior Leadership Team.
- Ensure that an annual review of safeguarding practice across OHC&AT, including policies, procedures, filtering and monitoring processes and training, is carried out and presented to the Quality, Standards & Safeguarding Committee.
- Ensure that OHC&AT meets the DfE's filtering and monitoring standards, including in relation to artificial intelligence (AI).
- Monitor the effectiveness of safeguarding across OHC&AT through the Quality, Standards & Safeguarding Committee as well as link Trustees for safeguarding and child protection.

- Ensure they are aware of current legislation and Academy/College responsibilities and that their own training in these areas is up to date.

**The Executive Senior Leadership Team (ESLT) will:**

- Oversee the development and implementation of robust safeguarding procedures across the organisation.
- Review and update this policy and any related policies/procedures at least annually, or as required by updates to legislation and national guidance.
- Report to Trustees on a termly basis regarding safeguarding, including data, trends, processes and related matters, via Board and the Quality, Standards & Safeguarding Committee.
- Annually review OHC&AT's filtering and monitoring processes against the DfE standards to ensure that they remain robust and fit for purpose, including in relation to any and all use of AI by OHC&AT provisions.
- Regularly review the overarching OHC&AT Safeguarding and Wellbeing Offer to ensure that it remains reflective of current best practice and delivery across the OHC&AT family.
- Monitor the development and implementation of local Safeguarding and Wellbeing Offers within each Academy and the College, as part of CEO monthly monitoring with Principals of each provision.

**The Director of Safeguarding & Wellbeing will:**

- Provide supervision not less than termly to Designated Safeguarding Leads in line with OHC&AT's Safeguarding Supervision Policy.
- Conduct individual safeguarding audits of each OHC&AT provision at least annually.
- Provide termly reports to the OHC&AT Quality, Standards & Safeguarding Committee.
- Oversee the development and delivery of comprehensive safeguarding training for OHC&AT staff throughout the year, in partnership with the OHC&AT Training team.
- Work with ESLT to regularly review the overarching OHC&AT Safeguarding and Wellbeing Offer.
- Lead monthly forum meetings for OHC&AT DSLs, Mental Health Leads and senior leaders.
- Work with DSLs to regularly review local offers within Academies and the College.

**<u>Within each OHC&AT provision</u>**

**Governors will:**

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Hold the Principal to account for the implementation of this policy.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and their provision's local multi-agency safeguarding arrangements.

- Appoint a safeguarding link governor to monitor the effectiveness of this policy in conjunction with the Local Governing Body. This is always a different person from the DSL.
- Undertake appropriate safeguarding and child protection training (including online safety) at induction and then at suitably regular intervals thereafter, so that they have the knowledge and understanding to be able to provide robust support and challenge to the Principal and SLT on all safeguarding matters.

Seek assurances that:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- Online safety (including filtering and monitoring) is a running and interrelated theme within the whole-school approach to safeguarding and related policies and staff training.
- The school or College has appropriate and effective filtering and monitoring systems in place, including in relation to AI.

Where another body is providing services or activities on school premises (regardless of whether or not the children who attend these services/activities are children on the school roll), seek assurances that:

- The other body has appropriate safeguarding and child protection policies/procedures in place, and that the school or College has inspected them if needed.
- There are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- Safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

Where appropriate, the Chair of Governors will work with the Deputy CEO and the Director of Safeguarding & Wellbeing in the event that an allegation of abuse is made against the Principal.

All governors are encouraged to read Keeping Children Safe in Education in its entirety.

**The Designated Safeguarding Lead (and Safeguarding Team) will:**

- Ensure all staff and local governors are aware of this policy and related documentation.
- Support staff involved in reporting incidents and concerns, including low level concerns.
- Attend weekly safeguarding risk and review meetings to ensure that all safeguarding concerns are effectively managed.
- Ensure the Safeguarding Team is up to date in terms of training and is fully involved and supported in decisions made.

- Have a good understanding of all current safeguarding issues including harmful sexual behaviour, child on child abuse, child sexual exploitation, female genital mutilation, forced marriage, bullying, hate crime, mental health issues, radicalisation and domestic abuse, and ensure all staff receive regular training on these issues.
- Have a good understanding of online safety and the filtering and monitoring processes within their school or College.
- Ensure staff teams are aware of how to identify and respond to risks to children and young adults from extreme or radical views.
- Embed a contextual safeguarding approach within the school, working to ensure that environmental and social factors that may impact upon students' welfare and safety are understood, considered and communicated to any safeguarding partners as necessary.
- Discuss concerns and support colleagues to arrive at effective responses within the confidentiality of the Safeguarding Team.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to inform the school's policies and processes.
- Be confident that they know what local specialist support is available to support all students involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Generate timely departmental safeguarding reports.
- Generate timely accident & incident reports.
- Work with Police, including the provision (where necessary) of child protection information to enable investigation of allegations of criminal abuse against children and adults.
- Attend (as appropriate) Local Authority Designated Person Support Network meetings.
- Work with the Principal and Senior Leadership Team to ensure that the provision's Safeguarding and Wellbeing Offer is maintained as a live document, effectively implemented across the school or College and underpinned by evidence of good practice.

**The Senior Leadership Team will:**

- Ensure all staff read, understand and abide by this policy and all related documentation.
- Support staff involved in reporting incidents and concerns, including low level concerns.
- Ensure that all staff undertake safeguarding and child protection training at induction and with regular refreshers thereafter, to ensure they understand the school/College's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
- Ensure that the safeguarding training available to staff:
    - Is regularly updated;
    - Is integrated, aligned and considered as part of the whole-school/College safeguarding approach and wider staff training, and curriculum planning

- Is in line with advice from the three safeguarding partners;
- Includes online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring;
- Encompasses the Prevent duty and whistle-blowing procedures.

- Work with OHC&AT HR to ensure that the Single Central Record of DBS checks for their provision is accurately maintained at all times.
- Work in partnership with LSCPs, ICBs and LAs to ensure children and young people gain the individualised support they require to achieve best outcomes, to safeguard them against maltreatment, and to ensure their health and development is not impaired.
- Provide termly safeguarding audit returns to the Deputy CEO, which will also inform termly safeguarding reports to governors.
- Provide monthly safeguarding data reports to the OHC&AT ESLT.
- Ensure that recruitment of staff is conducted in line with Safer Recruitment practices.
- Ensure that the school or College's Safeguarding and Wellbeing Offer is continually developed and implemented to the benefit of students and staff.
- Ensure that opportunities are maximised to deliver preventative education to students and families around safeguarding issues via the curriculum and whole school culture.
- Undertake relevant checks on any organisation wishing to hire school/College premises in order to ensure that all necessary safeguarding procedures are in place.

**All staff will:**

- Maintain an attitude of "it could happen here" in order to remain vigilant to the possibility of abuse and ensure that any and all safeguarding concerns, including low level concerns, are reported and acted upon in the appropriate manner.
- Understand that students are at risk of harm inside and outside their home, at school or College and online.
- Maintain professional relationships with students **at all times**. No attempt should be made to build or encourage any friendship with current or former students or their families outside of work. This includes telephone and personal contact and connecting via social media.
- Ensure that any and all correspondence with students and their families is via OHC&AT systems. Staff **must not** give their personal contact details to students including e-mail, home or mobile telephone numbers.
- Ensure they understand and adhere to this policy and all related policies and procedures listed at the end of this document.
- Ensure they are familiar with and adhere to all relevant procedures involved in recognising and reporting incidents.
- Report all concerns, without judgement about their significance, to the Designated Safeguarding Lead.
- Adhere to appropriate confidentiality.
- Engage in regular safeguarding and related training, including on whistle-blowing procedures and online safety, to ensure they understand the school's and OHC&AT's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

- Engage with the continuous development and implementation of the school or College's Safeguarding and Wellbeing Offer.
- Actively uphold the expected values of respect, tolerance, compassion and integrity, and model these values through their behaviour.
- Reinforce the importance of online safety when communicating with families. This includes making families aware of what the school or College asks students to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Create a culture where students, including those who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning, feel safe, can speak out and share concerns.

## CHILD PROTECTION AND SAFEGUARDING – RECOGNITION AND RESPONSE TO ABUSE

Abuse can take a number of forms:

- Physical: causing physical harm to a child or vulnerable adult by hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or some other method. Physical harm can also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child or vulnerable adult.
- Emotional: the persistent emotional maltreatment of a child or vulnerable adult in a way likely to cause severe and persistent negative effects on that person's emotional development.
- Sexual: forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not that person is aware of what is happening. Sexual abuse includes both physical contact and non-contact activities.
- Neglect: the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of that person's health and/or development.
- Financial: being denied access to funds, having funds misappropriated or misused by others, being pressured or manipulated into giving money away or using it in a way the vulnerable person does not wish.
- Institutional: the mistreatment, abuse or neglect of a child or vulnerable adult by a regime or individuals.

It is important to recognise the multitude of abusive situations that overlap within these definitions. Children and vulnerable adults may be at risk of abuse through such varied issues as bullying (including cyberbullying), substance misuse, child criminal or sexual exploitation, female genital mutilation, breast ironing, forced marriage, radicalisation and extremist behaviour, abuse related to protected characteristics e.g. racism/sexism/homophobia, domestic abuse, serious violence (including that linked to CCE), sharing of nude or semi-nude images, and others.

It is also important to recognise that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), child criminal and/or sexual exploitation, gender based violence/sexual assaults and sharing of nude or semi-nude images. All staff must

remain alert to the possibility of child on child abuse and take appropriate action to safeguard those involved, in line with this procedure.

Please refer to Appendices 1 and 3 for further detail on specific categories of abuse.

Staff may become aware of abuse in a number of ways, including:

- Disclosure by a student
- Disclosure or remarks made by another party (e.g. carer, other professional, member of the public)
- Discovery of bruising or marks on a student's body
- Unexplained changes in behaviour or personality
- Evidence of disturbance or explicit detail in drawing, writing or play
- Evidence of neglect in terms of cleanliness, personal hygiene, failure to thrive or apparent exposure to unnecessary risks
- Persistent lateness, poor or irregular attendance or persistent and/or unexplainable absence from school

However, it is important to remember that abuse may not always become apparent through direct disclosure or 'obvious' indicators, but through an accumulation of small incidents or concerns that form a pattern. Some students may not feel ready or know how to talk about abuse, not recognise their experiences as harmful, or feel embarrassed, humiliated or threatened; however, this should not stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a student. It is therefore essential that any and all concerns, including low level concerns, are reported to the DSL and/or Principal so that they can be recorded and acted upon as necessary.

## SAFEGUARDING – PROVIDING A SAFE ENVIRONMENT

Every OHC&AT Academy and College centre works to safeguard children and young people by:

- Building and maintaining a positive and ambitious whole school culture that supports students and staff to feel valued and respected.

- Ensuring provision is designed to acknowledge the potential vulnerability of all its students to be abused, particularly the additional vulnerability of students with special educational needs and disabilities (SEND).

- Ensuring provision delivers preventative education around safeguarding issues, in a way that is designed to equip students with the relevant knowledge and understanding to recognise when they are at risk and know what they can do to keep themselves and others safe.

- Supporting students to be confident and have good self-esteem, both through curriculum delivery and a whole school/College culture that meets their emotional and mental health needs and enables them to develop their social skills.

- Listening and responding to students and valuing all forms of communication, including non-verbal, assistive and augmentative communication, and behaviour, including behaviours of concern.

- Operating clear and effective systems to enable students to communicate that they feel safe or unsafe, and to ensure that all such concerns are followed up with appropriate action.

- Working with Local Authority Child Protection teams and LSCPs to elicit the student's wishes and feelings about their situation when child protection intervention is necessary, as well as their plans and hopes for the future; providing students with honest and accurate information about the current situation, as seen by professionals, and future possible actions and interventions; and involving the student in key decision-making.

- Providing learning experiences based on Spiritual, Moral, Social, and Cultural (SMSC) values to foster an environment of mutual respect, tolerance, and understanding for all, regardless of religion, gender, culture or ability.

- Ensuring staff understand, through regular training and updates, the many different forms that abuse can take, including (but not limited to) child on child/peer on peer abuse, hate crime, online abuse/exploitation, child sexual or criminal exploitation, domestic violence/abuse, radicalisation, serious violence (including that linked to county lines), faith abuse, bullying (including cyberbullying), discriminatory abuse e.g. racism/ homophobia/ transphobia, gender-based violence, female genital mutilation, neglect, substance misuse, fabricated or induced illness, trafficking and forced marriage.

- Ensuring staff understand, through regular training and updates, the need to be alert to mental health as a possible safeguarding concern. Mental health problems can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. They may also present a risk in themselves, for example putting a student at greater risk of self-injurious behaviour. OHC&AT staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Staff will inform the DSL of any mental health concerns about a student that may also be safeguarding concerns.

- Ensuring staff are aware of the possibility of abuse in any form, that they know what to look for in order to identify possible abuse or neglect, and are supported to know how to address this.

- Having clear procedures as detailed in this document for reporting and responding to allegations and concerns (including low level concerns) about abuse.

- Working co-operatively with other agencies.

- Operating a Safeguarding Team, including site DSLs for any satellite sites, to ensure decisions concerning complicated and sensitive issues are arrived at through informed discussion, whilst respecting confidentiality.

- Operating a policy and practice of safer recruitment in accordance with Keeping Children Safe in Education.

- Carrying out enhanced Disclosure and Barring Service (DBS) checks for all employees, agency staff, contractors and volunteers and maintaining an internal DBS Single Central Record at each setting.

- Operating a comprehensive range of generic and personalised individual student risk assessments to ensure students are safe whilst at OHC&AT provisions or undertaking related activities within work placements and the community.

- Ensuring all risk assessment changes and new safeguarding-related information are incorporated into student information accessible to staff, whilst still ensuring confidentiality where applicable.

- Operating an Online Safety Policy and good practices, including comprehensive filtering and monitoring processes, including in relation to AI, and appropriate management of students' own devices while in school or College, to ensure students can maximise the potential of technology whilst remaining safe and developing an age-appropriate understanding of potential threats such as cyberbullying, sharing of nude or semi-nude images, revenge porn and stalking.

- Operating clear guidance around the provision of remote learning, in order to ensure that students who are unable to access learning on site are appropriately safeguarded while learning remotely; that staff are supported to deliver remote learning safely and effectively; and that any safeguarding concerns identified during online learning sessions are reported and followed up effectively.

- Operating a Behaviour Policy with incorporated best practice guidance around physical intervention, to build respect and communication between staff and students and to ensure that behaviour at all provisions is managed in a positive, safe and supportive way.

- Creating awareness of the dangers of downloading and sharing inappropriate material which is illegal under the Counter-Terrorism Act (2015).

- Adhering to the Prevent Duty, ensuring staff are able to protect children and young people who are vulnerable to becoming involved with or supporting terrorism.

- Carrying out a Prevent risk assessment to assess and review any potential risk of radicalisation to students.

- Promoting awareness of the Channel programme which provides support for children and young adults identified as vulnerable to becoming involved with or supporting terrorism.

- Operating a comprehensive and regularly reviewed suite of Health & Safety policies and procedures, including Fire Safety, Critical Incident Plan and Lockdown Procedure, and ensuring that staff are regularly trained in all relevant aspects of health and safety practice.

- Operating a Relationships and Sex Education (RSE) policy alongside an RSE and a Health Education curriculum appropriate to each provision and in line with statutory guidance, in order to support students to develop their understanding of how to keep themselves and others safe in relationships and sexual situations.

- Having regard to the DfE guidance document 'Children Missing Education' (2024) and operating suitable reporting procedures accordingly. All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent from education in their area. A child who is absent from education is a potential indicator of abuse, exploitation or neglect. OHC&AT students above compulsory school age are also vulnerable to these risks, and thus OHC&AT extends this consideration to students over 18. All staff will be aware that children missing from education or absent persistently, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation, and will apply all safeguarding procedures detailed in this document wherever they have concerns in relation to a child missing education.

- Observing Local Authorities' Child Sexual Exploitation Strategy. The **Statutory definition of Child Sexual Exploitation** is given below.

  Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

- Having regard to Deprivation of Liberty Safeguards, which are safeguards for people who lack capacity to make decisions regarding their own safety. Every OHC&AT Academy and College centre provides a safe environment for the diverse needs of all its students, ensuring the safety and due liberty of them all as individuals. OHC&AT staff ensure that student choice and best interest is considered at all times and that decisions being made suit the needs of the student to which they pertain.

- Operating a comprehensive and regularly reviewed suite of policies and procedures designed to safeguard the wellbeing of children and vulnerable adults, and ensuring that staff understand and enact these policies and

procedures – please refer to the full list of Related Policies and Procedures at the end of this document.

## SAFEGUARDING MECHANISMS

OHC&AT operates a range of mechanisms to ensure that all staff understand their roles and responsibilities with regard to safeguarding.

## Staff training and related requirements

All staff must read and sign at least Part 1 or Annex A of the latest version of Keeping Children Safe in Education, upon commencing employment and whenever the guidance is updated. All staff are given safeguarding training at least annually, including training on whistleblowing, online safety, the Prevent duty and Channel, and regular safeguarding updates are provided throughout the year in order to ensure that staff are fully up to date with the relevant skills and knowledge.

Upon induction, staff are required to read all safeguarding related policies and procedures, and to sign and date to confirm that they understand their roles and responsibilities with regard to safeguarding. Staff are also required to read these policies and procedures whenever they are updated, and sign and date to indicate that they have done so. Updates are communicated centrally to Principals, Heads of Central Teams and DSLs so that they may be cascaded to staff.

OHC&AT operates a central training matrix for safeguarding, which details the level and frequency of training required for different roles within the organisation. Every OHC&AT provision is required to evidence compliance with the training requirements set out in the matrix as part of their termly safeguarding audit return to ESLT.

Governors and Trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated thereafter. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing effective support and challenge to the Principal and Senior Leadership Team.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

Other mechanisms include, but are not limited to:

- safeguarding induction, including safeguarding learning walks to help assess the impact of training and to identify support needs
- whole school annual safeguarding training
- whole organisation safeguarding training looking at specific safeguarding issues (e.g. child on child abuse) with a focus on safeguarding young people with additional needs
- online safeguarding training including modules with specific focus (e.g. child on child abuse), with online exam questionnaires
- safeguarding quizzes

- safeguarding refresher workshops, which are held on the vast majority of training days
- staff team involvement in the development and maintenance of each provision's Safeguarding and Wellbeing Offer, ensuring that all staff understand and engage with the practice of safeguarding as it threads through every area of school or College life, including curriculum delivery, pastoral care, careers education and relationships with families
- regular contact between link governors/Trustees for safeguarding and Principals/OHC&AT senior staff
- emails to staff regarding key issues, updates and individual early help plans
- all recruitment being conducted in accordance with Safer Recruitment practices
- clear expectations for all staff around acceptable use of technology in accordance with the Staff Code of Conduct and the IT Acceptable Use Policy – staff understand that they must not use their personal devices around students or to take photographs of students, and that they must not divulge their personal contact details or connect with students on social media

The child protection/safeguarding register is maintained by the DSL and all staff working with students are informed of all matters relating to students in their classes. In addition to our child protection/safeguarding register, the DSL keeps comprehensive records of any and all concerns raised, and the actions taken.

Regular feedback to the governing body on all safeguarding issues is provided by the DSL and the Senior Leadership Team (SLT), through regular contact with the link governor for safeguarding as well as termly reporting to the Local Governing Body. OHC&AT Trustees monitor safeguarding and child/vulnerable adult protection matters via termly meetings of the Quality, Standards & Safeguarding Committee alongside the termly Safeguarding Governance Forum which provides opportunities for safeguarding link governors and Trustees to meet and discuss key issues.

Safeguarding also forms part of the regular quality monitoring visits made to academies and College centres by the OHC&AT Executive Senior Leadership Team (ESLT). Additionally, every OHC&AT provision provides a termly safeguarding audit return to enable identification of possible trends or emerging issues across the organisation as well as central and local oversight of compliance and best practice.

## Recruitment and disclosure

OHC&AT recruitment is always conducted in accordance with Safer Recruitment procedures. Every interview panel has at least one member who is Safer Recruitment trained. Once an offer of employment has been made, OHC&AT will apply for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the College or Academy which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's or Adults Barred List and to obtain other relevant suitability information.

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to OHC&AT. It is a condition of employment with the College/Academy that the **original** disclosure certificate is provided to the College/Academy as soon as is practical after the certificate is received.

All offers of employment are made subject to clearances and remain conditional until satisfactory completion of all mandatory pre-employment checks, including the provision of an original DBS certificate that the College or Academy considers satisfactory.

Additional pre-employment checks (verification of identity, address and qualifications; references) are carried out for every candidate, as well as (where relevant to the role) checks on prohibition from teaching, overseas criminal records checks, prohibition from management and childcare disqualification. OHC&AT may conduct online searches on shortlisted candidates, and these are carried out for all successful candidates after an offer of employment has been made. While Disqualification by Association no longer applies in schools, it remains the case that the relationships and associations that staff have in school and outside (including online) may have an implication for the safeguarding of students and as such there is an expectation that staff will speak to the school promptly if any such situation should arise. Please refer to our Recruitment & Selection Policy and Procedure for full details.

If there is a delay in receiving a DBS disclosure the Principal has discretion to allow an individual to begin work pending receipt of the disclosure certificate. **This will only be allowed if all other checks, including a clear check of the Children and Adults' Barred List (where the position amounts to regulated activity) and receipt of satisfactory references, have been completed and once appropriate supervision has been put in place.** A risk assessment which must be completed and signed prior to the start of employment. Final authorisation is required by OHC&AT HR in consultation with the Deputy CEO. This exemption does not apply to OHC staff, who may not commence employment until their original DBS certificate has been presented and accepted.

All staff are required to complete a Declaration of Interest upon commencing employment and annually thereafter, in order to declare any personal or professional relationships or interests that may have bearing on their work. Where a declared interest or connection may have implications around conflict of interest or the safeguarding of children or vulnerable adults, relevant OHC&AT teams and/or the staff member's line manager will work with them to assess and mitigate any potential risk to our students, our staff and our organisational reputation.

## Visitors

All visitors to OHC&AT premises must sign in at reception and provide confirmation of identity upon arrival. Once signed in, visitors are provided with key safeguarding and health and safety information as well as the Family & Visitors Code of Conduct. Visitors will be accompanied at all times by a member of staff. Risk assessments are carried out as necessary e.g. for speakers invited to academies or College centres. All visitors must sign out upon leaving.

## Working with families

Keeping relevant, up-to-date and accurate information about our students is a key aspect of effective safeguarding. OHC&AT provisions will regularly ask all families to provide them with the following information and to notify them of any changes that occur:

- Names and contact details of persons with whom the student normally lives
- Names and contact details of all persons with parental responsibility
- Names and contact details of **at least** three emergency contacts for the student
- Details of any persons authorised to collect the student from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the student (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- Name and contact detail of the student's general practitioner
- Any other factors which may impact on the safety and welfare of the student

Information about students given to OHC&AT provisions by the students themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a "need to know" basis in order to support the student if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection or safeguarding nature, as noted in Keeping Children Safe in Education which states *"DPA and GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children."* We understand that this duty applies to both children and vulnerable adults, and that information sharing in this context is in the best interests of the student and overrides any other duties we have regarding confidentiality and information sharing.

We have a duty to keep any records which relate to child protection/safeguarding work undertaken by us or our partner agencies and to ensure that these are kept apart from the main student record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school or other provider to which the student transfers.

If we have a reason to be concerned about the welfare of a student we will always seek to discuss this with the student's family in the first instance, subject to the conditions laid out in our Safeguarding Procedure (below). On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to social care services when to do otherwise may put the student at risk of further harm either because of delay, or because of the actions of parents or carers.

## Use of alternative provision

OHC&AT recognises the importance of safeguarding students placed in alternative provision (AP). To ensure the safety and wellbeing of all students, the following procedures are in place:

- Written safeguarding assurances **must** be obtained from all AP providers prior to placement, confirming that the provider has appropriate safeguarding policies, procedures, and staff training in place.
- AP providers will be visited not less than half termly by a member of the OHC&AT provision's Senior Leadership Team as part of regular quality monitoring and safeguarding assurance check, and a written report completed.
- Individual placements will be reviewed during school/College safeguarding risk and review meetings to assess the suitability, safety, and progress of the student. Reviews will include input from the AP provider, the student, and relevant school staff.
- Attendance at AP sites will be tracked daily. Any unexplained absences or patterns of concern will trigger immediate follow-up.
- If any safeguarding concerns arise during a placement, immediate action will be taken. This may include contacting the AP provider, the student's parents/carers, and relevant safeguarding authorities.
- All AP arrangements will be documented and monitored by the Designated Safeguarding Lead (DSL).

## Online safety

Ensuring that students can safely access new technology and learn how to participate in the digital world without compromising their safety and security is a key part of delivering a well-rounded programme of education. OHC&AT provisions aim to teach students how to manage and deal with risks they encounter by themselves, whilst at the same time encouraging them to become positive users of both new and emerging technologies.

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

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

Students are taught about safe and appropriate electronic communication, including the indelible nature of emails, social media presence, images and other e-communications. Aspects of e-safety such as cyberbullying, revenge porn, trolling and

other harassment are covered in an age-appropriate way, with emphasis placed on respecting oneself and one's peers, in order to build confidence and understanding among students as they interact with technology.

For younger students Internet use is closely supervised and based around pre-selected, safe websites. Students are regularly reminded about how to always take care when clicking and to seek help from an adult if they see anything that makes them unhappy or that they are unsure about. These digital literacy skills are developed in keeping with students' age and ability, with lessons promoting a responsible attitude towards searching the Internet and the importance of personal security measures such as strong passwords and processes for reporting any concerns.

As they progress through school or College, students are encouraged to become more independent at researching information on the Internet, being taught the necessary skills to critically evaluate sites for accuracy and suitability. They are supported to use online collaboration tools for communicating and sharing ideas.

When students are not currently attending school or College, the risks associated with online activity including remote learning are potentially heightened. When sending work home to students currently unable to attend, OHC&AT provisions include information on staying safe online and sources of support, including reporting pathways, where students have concerns about online activity. This includes details of Safeguarding teams, as well external agencies including:

- Childline – for support
- UK Safer Internet Centre – to report and remove harmful online content
- CEOP – for advice on making a report about online abuse

The school/College website is also kept updated with relevant links and other e-safety information for both students and families.

When setting home learning, OHC&AT provisions ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

OHC&AT operates clear procedures around delivering remote learning, including the following key points:

- Staff must adhere to the OHC&AT Staff Code of Conduct at all times, including when delivering remote learning.
- All delivery must take place from OHC&AT premises, via OHC&AT systems and using OHC&AT devices.
- Live classes should be kept to a reasonable length of time and must take place during normal school/College hours.
- Ideally virtual sessions should be delivered to groups only, and at least two members of staff should attend.
- When planning delivery of live sessions, staff should consider the needs and profiles of each pupil/student intended to receive the session and risk assess accordingly.
- Live sessions should not be recorded unless they are 1:1 (see below) and images should not be made during live sessions. For example, if staff need to

take a screenshot of content produced during a session, they must ensure that pupils'/students' faces and names are not in view.

- Staff should check whether pupils/students are happy to keep their cameras on during live classes, once pupil/student identities have been established at the start of the session. Use of cameras may be encouraged but not compelled.
- Staff and children/young people must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be neutral or blurred.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms specified by senior managers and approved by the IT network manager/provider to communicate with pupils/students.
- Staff should record the length, time, date and attendance of any sessions held.

Where remote access is used to deliver 1:1 sessions, for example counselling sessions, these must be recorded and the recordings safely stored in accordance with OHC&AT policies on IT acceptable use and records retention. Accordingly, the following stipulations have been made:

- 1:1 sessions must only be delivered from OHC&AT premises.
- 1:1 sessions must only be recorded on OHC&AT devices.
- Students and parents/carers must be made aware that sessions are being recorded and that recordings will be safely stored.

This is to ensure that students and staff are protected, both in terms of safeguarding and information security.

Staff maintain regular contact with all students not currently attending, and this provides a further opportunity to discuss online safety with them, their parents and carers. We are aware that when a student is unable to attend school for any length of time, families may wish to access additional home learning support, for example tutors or other specialists, and staff emphasise the importance of securing online support from reputable organisations/individuals who can provide evidence that they are safe and can be trusted to have access to children or vulnerable adults.

**Artificial Intelligence and cyber resilience**

As part of our commitment to safeguarding in a digital age, OHC&AT recognises the growing role of Artificial Intelligence (AI) in education and the importance of cyber resilience across all provisions.

Staff are trained to understand the opportunities and risks associated with AI tools, including:

- The potential for AI-generated content to be misleading, harmful or inappropriate.
- Risks related to deepfakes, synthetic media, and automated grooming or exploitation.
- The importance of critical digital literacy when engaging with AI-powered platforms.

Our filtering and monitoring systems are regularly reviewed to ensure they are robust against emerging threats, including:

- AI-enhanced phishing and scams
- Automated content manipulation
- Unregulated AI chatbots or tutoring platforms

Staff receive regular updates and training on cyber resilience, including:

- Safe use of AI tools in teaching and learning
- Identifying and responding to AI-related safeguarding concerns
- Ensuring student data privacy and protection in AI-integrated systems

We are committed to maintaining a secure digital environment where students can benefit from technological innovation while being protected from harm.

## SAFEGUARDING PROCEDURE

### Responding to concerns about individual students

Staff must follow OHC&AT's safeguarding procedure if they have any concern regarding a student. However, staff should also be aware that **if there is a risk of immediate serious harm to a student, a referral can and should be made to social care immediately** and that **anybody can make a referral.** If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration.

All students at OHC&AT provisions must be able to place their trust and confidence in any adult working in the school or College. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately. There are clear processes in place at OHC&AT provisions detailing who students can speak to, how their concerns will be acted upon and followed up; these processes are displayed around the school and regularly publicised to students via channels such as assemblies and tutor time.

All staff must therefore know what to do if someone chooses to talk to them about any matter which raises safeguarding concerns.

When listening to an allegation of abuse, staff must:

- Listen without interruption or judgement to what is being said
- Avoid using leading questions. Open questions and phrases should be used as much as possible; for example ask 'What did you see?' and not 'Did you see…?
- Wait to seek help until after the disclosure has been made
- Respect the person's right to privacy but not promise confidentiality
- Reassure the person making the disclosure that he/she has done the right thing in sharing
- Explain to the person that in order to keep him/her safe from harm the information that has been shared must be passed on

- Report what has been disclosed to the DSL as soon as possible, or in their absence, one of the DDSLs
- Record in writing, as soon as is practicable, but within 24 hours what was said using the person's actual words. Records must be signed and dated.
- Remember that if there is a risk of immediate serious harm to a student a referral can and should be made to social care immediately and that anybody can make a referral. If the student's situation does not appear to be improving, the staff member with concerns should press for re-consideration.

Not all safeguarding concerns will be raised through direct or indirect disclosure. In all situations where a member of staff has a safeguarding concern, including wherever they suspect abuse or witness an incident that appears to be abuse, or whenever a disclosure is made, that person must report it to the DSL as soon as possible for advice and guidance. In the DSL's absence they should inform a member of the school Safeguarding Team.

A confidential written report on the incident should be completed as soon as possible if alleged abuse has been witnessed or is suspected. This report must be handed to the DSL or, if they are not available, to a member of the school/College Safeguarding Team.

The Principal of the relevant school or College must be informed of all allegations or suspicions of abuse. This will be done by the DSL. Action set out in this policy **should not** be delayed until this is done.

OHC&AT will stay closely involved and will check with the appropriate authorities that the allegation is being appropriately investigated.

## Contact with the family

Contact with the family should be discussed with the DSL, who may consult Social Services – either the designated Care Manager or the Duty Care Manager, the Education Welfare service or other relevant agencies. Referrals should be made to the student's home borough.

In cases where a minor physical injury causes concern, it may be appropriate to discuss this with the parent or carer. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the student from harm), the parent or carer will be informed that the matter must be referred to Social Services.

In cases of possible neglect or emotional abuse, the concern is likely to have built up over a period of time. There may have been discussion between OHC&AT staff and the family about sources of help (e.g. Social Services), but if concerns persist, the DSL will need to refer to Social Services and will normally advise the family of this.

In cases where there are suspicions of sexual abuse, the DSL will seek immediate advice from Social Services staff before discussing the matter with the family.

## Recording and reporting

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If there is any doubt about whether to record something, staff must discuss it with the DSL.

OHC&AT provisions use CPOMS for recording safeguarding incidents and concerns. Access to records is controlled via permissions: all staff can make a report via the system, but can only see the reports they have made. The DSL and Safeguarding Team within each provision have full access to reports and student records.

When reporting an incident or concern, whether electronically or in person, the person reporting must make an accurate written report of what they have observed or what their concern is. This must be submitted to the DSL who will make any necessary additional notes.

The DSL (or a member of the Safeguarding Team at the request of the DSL) will complete the school or College's referral form or, in the case of an ongoing concern, add to the existing one.

All safeguarding emails sent outside of OHC&AT **must** be encrypted.

Social Services must be contacted about any allegations or suspicions of abuse. This will usually be done by the DSL. In making contact with Social Services or the Police, the caller must note that the issue is one of suspected abuse or a suspected crime against a child or vulnerable adult.

Written statements and the school/College referral form must be provided by the school/College to Social Services or, if appropriate, the Police, including the details of allegations/incidents observed. These must be provided as soon as possible, preferably on the same day. Copies must be provided to the DSL immediately.

The person reporting the incident (unless otherwise agreed by the Safeguarding team, the DSL) will contact the individual's named care manager or, if they do not have one, the duty manager.

All records relating to student welfare concerns will be retained electronically within CPOMS. Where hard copies of records are kept, these will be in a safeguarding file held separately from the student's main file. Hard copy safeguarding files will be held in lockable storage accessible only to the Principal and the DSL, and clearly marked as 'Confidential – for attention of the Designated Safeguarding Lead'.

Information from records will only be used on a 'need to know' basis.

Relevant staff will be made aware when a student is subject to a Child Protection Plan, so they can monitor the student's welfare.

Records relating to the student's welfare will remain on the student's file as long as that person is a student at the school or College.

If a student for whom the school or College has, or has had, safeguarding concerns moves to another provision, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new school/college to have support in place when the student arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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.

Safeguarding data reports must be provided to the OHC&AT Executive Senior Leadership Team (ESLT) monthly and to governors termly.

## Where a criminal offence is suspected

Wherever a criminal offence is alleged, or is suspected to have taken place, the police must be contacted. OHC&AT staff reporting to the Local Authority Designated Officer (LADO), or if unavailable, MASH or other relevant contact, should clarify who will contact the police. If it is agreed that the LADO should contact the police, then the DSL will follow this up by making themselves known to the police and requesting confirmation as to whether the matter is being investigated.

## Immediate risk or danger

If an individual is at immediate risk, or in situations where there is forensic evidence, then the police and, if appropriate, other emergency services must be contacted immediately. In such cases the emergency services should be called before informing the DSL or a member of the Safeguarding team.

## Requests for assistance by other agencies

OHC&AT provisions are required to assist local authority Social Services or the Police when they are making enquiries about the welfare of children or vulnerable adults. Information about a child or vulnerable adult must therefore be shared on a 'need to know' basis with other agencies.

When telephone requests for information are received, always maintain security by checking the telephone number listing and calling back.

Always advise the DSL of any request for assistance from other agencies.

Requests for attendance at meetings about individual students (e.g. Child Protection conferences) should be notified to the DSL, who will arrange preparation of a report and attendance at the meeting.

Reports should contain information about the student's:

- academic progress
- attendance
- behaviour
- relationships with peers and adults
- family
- any other relevant matter

Reports should be objective and distinguish between fact, observation, allegation and opinion.

Unless otherwise specified, reports will normally be made available to the student's family.

## Students subject to a Child Protection Plan

OHC&AT provisions will be told by the relevant Social Services when a student is subject to a Child Protection Plan (previously the CPR). The name of the key care manager must be clearly recorded on the student's record.

The school or College will participate fully in the work of the core group, to assist with the objectives of the Child Protection Plan.

When a student is on a Child Protection Plan, the school or College will report all absences, behavioural changes or other concerns to the key social worker.

When a student on a Child Protection Plan leaves the school or College, all the safeguarding information must be transferred to the new provision.

## MANAGING ALLEGATIONS OF ABUSE AGAINST STAFF

OHC&AT will always supervise staff and act on any concerns that relate to the safeguarding of children or vulnerable adults.

Allegations or concerns (including low level concerns) about a member of school- or College-based staff, including supply staff and volunteers, must immediately be notified to the relevant Principal as well as the OHC&AT Director of Safeguarding & Wellbeing (or the Safeguarding Governor, the OHC&AT Deputy CEO and the OHC&AT Director of Safeguarding & Wellbeing if the concern is about the DSL/Principal) and the same principles of safeguarding applied as detailed elsewhere in this document. Allegations or concerns about a member of shared services staff, including supply staff and volunteers, must immediately be notified to the OHC&AT Director of HR, who will liaise with the Director of Safeguarding & Wellbeing and other senior OHC&AT staff as required.

If the concern is about the Director of HR or Director of Safeguarding & Wellbeing, this should be notified to the CEO or Deputy CEO.

It is important to bear in mind that although concern may relate to an individual students, other students may also be at risk.

The Principal (or Safeguarding Governor) will always consult the Local Area Designated Officer (LADO) about allegations/concerns about members of staff.

The LADO is responsible for managing child protection/safeguarding allegations against staff and volunteers who work with children or vulnerable adults.

A referral should be considered if there is a concern that a member of staff, supply staff or volunteer who works with children or vulnerable adults has:

- Behaved in a way that has harmed a child/vulnerable adult or may have harmed a child/vulnerable adult;
- Possibly committed a criminal related offence against or related to a child/vulnerable adult;
- Behaved towards a child/vulnerable adult in a way that indicates that they may pose a risk of harm to children/vulnerable adults; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/vulnerable adults.

Where there is an allegation of an incident happening while an individual or organisation was using OHC&AT premises to run activities for children or vulnerable young people, the Principal of that provision will follow OHC&AT safeguarding policies and procedures and inform the LADO.

## Low level concerns

Low level concerns are those that do not meet the threshold for referral. This does not mean that they are insignificant. All staff should feel able to raise a concern about something they feel is inappropriate or cause for unease, and know that it will be recorded, explored and if necessary followed up with appropriate action.

KCSIE defines a low level concern as "*any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college 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 LADO*."

Examples may include (but are not limited to):

- Being over-friendly with a student or students
- Humiliating students
- Having favourites
- Failing to challenge inappropriate language or behaviour between students (e.g. dismissing the use of sexual slurs as 'just banter')
- Sharing inappropriate details of their own or a colleague's life with students (e.g. details of drunken behaviour framed as humorous anecdotes)

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but may not be in specific circumstances, through to that which is ultimately intended to enable abuse. All staff are encouraged

to stay reflective of their own as well as others' behaviour, and to raise any concerns about situations or behaviours that may be or seem inappropriate whether these relate to themselves or others.

The Principal (or relevant member of ESLT/OHC&AT HR Director, as noted above) will decide on appropriate action, in consultation with the DSL. If the concern is about the DSL, decisions will be made by the Principal in consultation with the Safeguarding Governor; if it is about the Principal, decisions will be made by the CEO and/or Deputy CEO in consultation with the Chair of Governors.

Appropriate action may include referral to the LADO in order to ascertain whether the harms threshold is met; further training/support for staff; and/or addressing unprofessional behaviour via relevant HR procedures. Where a pattern of concerning or inappropriate behaviour is identified, OHC&AT may implement disciplinary proceedings and/or refer to the LADO where the harms threshold is met.

## Following LADO referral

The LADO will make a decision as to which of the following needs to happen:

- An initial evaluation meeting (this is normally a telephone discussion between the referrer and the LADO)
- A LADO process (a senior strategy meeting)
- A joint or single-agency investigation
- Advice regarding potential capability or disciplinary procedures to be used by the employer
- A referral to another agency
- A complaints investigation
- Further enquiries to be made
- No further action

Following discussions with the LADO, the Principal (or Safeguarding Governor, OHC&AT Deputy CEO or OHC&AT Director of Safeguarding & Wellbeing in discussion with OHC&AT HR) will decide on appropriate action, which may include:

- Suspension of the staff member;
- Consideration of disciplinary proceedings – please refer to the OHC&AT Disciplinary Procedure for further details;
- If suspension is not agreed, but there is an ongoing investigation, then a risk assessment should be carried out and agreed by the OHC&AT Director of Safeguarding & Wellbeing.

Confidentiality is essential and information about an allegation must be restricted to those who have a need to know in order to: a) protect children/vulnerable adults, b) facilitate enquiries, c) avoid victimisation, d) safeguard the rights of the person about whom the allegation has been made and others who might be affected and e) manage disciplinary/complaints aspects.

## Informing the subject of an allegation

The Principal (or OHC&AT Director of Safeguarding & Wellbeing/ OHC&AT Deputy CEO) should inform the accused person about the allegation as soon as possible, but

only after consulting the LADO about whether this is appropriate at this stage and what information can be given to the person.

The subject of the allegations (whether suspended or not) shall be: a) advised to contact her/his trade union or professional association, b) treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes, c) kept informed of the progress of the case and of the investigation, d) clearly informed of the outcome of any investigation and the implications for disciplinary or related processes and e) provided with appropriate support as appropriate.

## Suspension

Consideration must be given as to whether it is necessary to remove the subject of the allegations from contact with students, pending investigations and procedures arising from the allegation. Suspension should not be automatic, but should be considered if: a) there is cause to suspect a student is at risk of significant harm, b) the allegation warrants investigation by the police, or c) the allegation is so serious that it might be grounds for dismissal.

Any decision to suspend shall be taken only after consultation with the LADO. It will take into account the safety of the student or students involved and the impact on any enquiry.

Where it has been deemed appropriate to suspend the person, written confirmation will be provided in line with OHC&AT's Disciplinary Procedure. The letter should be dispatched within 24 hours, giving the reasons for the suspension. The person should be informed at that point who their named contact is within the organisation and provided with their contact details.

## Supply teachers

In cases where an allegation is made against a supply teacher or other individual not directly employed by the school, OHC&AT will take all necessary steps to ensure that any such allegations are investigated and followed up in line with guidance given in Part Four of KCSIE. The subject of the allegation will be advised to contact their trade union representative if they have one, or a colleague for support. The DSL and Principal will investigate the allegation and liaise with the LADO to determine a suitable outcome. We will also work with the employing agency to ensure that any previous concerns or allegations known to the agency are taken into account during the investigation, and that the outcome of the investigation is taken forward by them as necessary.

## Further action

The school or College can only undertake an investigation after the LADO has considered the case and indicated that a local investigation can take place.

If, after appropriate consultation and investigation, it is decided that no further action is necessary, this decision and the reasons for it should be recorded by both the Senior

Leadership Team and the LADO. They should agree between them the information that should be put in writing to the individual about whom the allegation was made. Both should then consider the action that should follow in respect of that individual and also the person (or persons) who made the allegation.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references, in line with Keeping Children Safe in Education.

If, following the conclusion of child protection/safeguarding processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

OHC&AT will abide by the legal duty as stated in KCSIE to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

## RELATED POLICIES AND PROCEDURES

Anti-Bullying Policy
Anti-Radicalisation Policy
Attendance Policy
Behaviour Policy
Complaints Policy and Procedure
Data Protection Policy
Dignity at Work Policy
Educational Visits Policy
Equality, Diversity & Inclusion Policy
Fire Policy and Procedures
Health & Safety Policy
Lone Working Policy
Missing Child Policy
Online Safety Policy
Personal & Intimate Care Policy
Recruitment & Selection Policy
Relationships & Sex Education Policy
Risk Assessment Policy
Safeguarding Supervision Policy
Social Media Policy
Staff Code of Conduct
Substance Misuse Policy
Supporting Students with Medical Conditions in Education Policy
Suspension and Permanent Exclusion Policy

Staff Mental Wealth, Health and Wellbeing Policy
Student Mental Wealth, Health and Wellbeing Policy
Safeguarding and Wellbeing Offers (local and overarching)
Visiting Speaker Policy
Whistleblowing Policy

## FURTHER INFORMATION, ADVICE AND GUIDANCE

Keeping children safe in education (DfE)
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Protecting children from radicalisation: the Prevent duty (DfE)
https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

Report Abuse in Education (NSPCC helpline)
A dedicated helpline for children and young people who have experienced sexual harassment or abuse at school, and for worried adults and professionals that need support and guidance – contact on 0800 136 663 or email help@nspcc.org.uk

Working together to safeguard children (DfE)
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Child sexual exploitation: definition and guide for practitioners (DfE)
https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners

Children missing education (DfE)
https://www.gov.uk/government/publications/children-missing-education

What to do if you're worried a child is being abused (DfE)
https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement (DfE)
https://www.gov.uk/government/publications/school-exclusion

Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE)
https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

Criminal exploitation of children and vulnerable adults: county lines (Home Office)
https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

Teaching online safety in school (DfE)

https://www.gov.uk/government/publications/teaching-online-safety-in-schools

Positive environments where children can flourish (Ofsted)
https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish

Promoting and supporting mental health and wellbeing in schools and colleges (DfE)
https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges

Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, 2020)
https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings (DfE)
https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings

Keeping children safe in out-of-school settings: code of practice (DfE)
https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice

London Safeguarding Children Procedures
https://www.londonsafeguardingchildrenprocedures.co.uk/

## APPENDIX 1: SAFEGUARDING AND CHILD PROTECTION IN SPECIFIC CIRCUMSTANCES

### ATTENDANCE AND CHILDREN WHO ARE ABSENT FROM EDUCATION

We know that a student's unexplained absence from school or College could mean that they are at risk of harm and that a child or vulnerable adult going missing from education is a potential indicator of abuse or neglect. Every OHC&AT provision has a clear attendance policy in place, in line with DfE statutory guidance on Working Together to Improve School Attendance:

- Any student going missing from education will always get immediate attention from the DSL. Staff are trained to be alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.
- When a student is absent without notification, the attendance administrator will record the absence in the register and the school/College will endeavour to contact the parents/carers and other emergency contacts in order to determine the reason for the absence. This will happen for every day of non-attendance where no call has been received informing us of absence and reasons why.
- Any unexplained absence of a child with a Child Protection Plan will be reported to the child's social worker within one day.
- Where a student does not present for school/College as expected, the school/College will endeavour to ascertain that student's whereabouts and wellbeing without delay, using all available parent/carer and secondary/emergency contact details. Where no contact can be made with either the student or any named emergency contacts, a member of school/College staff should generally attend the student's home. If the student or a named contact still cannot be contacted, the school/College must report this to relevant personnel in the Local Authority and, where deemed necessary, the police. However, it is acknowledged that in some exceptional, local circumstances, such action may be counter-productive and it is for the school or College to risk assess such a scenario on the first day. Regardless of this, if a student is absent for a second consecutive day without notification from a named contact, the school/College **must** report this to relevant personnel in the Local Authority and, where necessary, the police. We will always report to the Local Authority the name of any student who has been newly registered to attend the school/College but does not arrive on the expected day.
- We will always report to the Education Welfare Service the continued absence of a student known or thought to have been taken overseas if the student does not return to school/College on the expected return date.
- We maintain accurate attendance and admissions registers (all students are on both), in line with statutory requirements. This includes paying careful attention to off-rolling students in association with the Local Authority and knowing, and recording, student destinations consistently on the admissions register. Where a student destination is unknown, and unable to be sought after significant follow-up, the Local Authority, Education Welfare Service and/or social care services will be informed.

- Schools' attendance data is shared daily with the DfE as required by statutory guidance.
- We do not 'delete' students from the admissions register. We alert the student's Local Authority immediately if:
    - the student has been taken out of school/College by their parents and is being educated outside the school system e.g. home education
    - the student has ceased to attend school/College
    - the student has been certified as medically unfit to attend school/College or is in custody.

Keeping Local Authorities up to date is crucial so that they can check if children of compulsory school age/vulnerable adult students are missing education, and might therefore be in danger of not receiving an education and be at risk of abuse or neglect.

On the rare occasions that OHC&AT provisions exclude students for a fixed term, we put this in writing to both the family and the placing Local Authority. While we provide the student with work to complete during their external exclusion (and mark it), we are not responsible for the student's safety and welfare during their time at home.

## BULLYING

Bullying is a safeguarding issue. Each OHC&AT provision operates an Anti-Bullying Policy which makes clear that bullying of any kind against students or staff is wholly unacceptable. It is the responsibility of the whole OHC&AT community to promote an ethos of mutual respect, fairness and equality in everything we do, in order to create a positive atmosphere for all. We will always take seriously any reports of bullying and respond appropriately, as set out in the Anti-Bullying Policy.

We understand that bullying may take different forms and may include, as examples, racist, sexist, disablist, homophobic, transphobic and biphobic behaviours. All staff are clear about the Protected Characteristics, as prescribed in the Equality Act 2010 (see our equality policy). Any such reported or observed incident will be dealt with in accordance with our policy.

## CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how

to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org/ and www.clevernevergoes.org .

## CHILD CRIMINAL EXPLOITATION (CCE) INCLUDING 'COUNTY LINES'

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants (please note that such exchanges are coerced and should not be considered as consensual or freely given), and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm. County lines, in particular, involves child criminal exploitation as gangs use children to move and sell drugs from urban areas to rural environments. CCE presents multiple complex safeguarding issues including violence, sexual exploitation, substance misuse and missing persons. Like other forms of abuse and exploitation, child criminal exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

It is recognised that children and young people with existing vulnerabilities e.g. previous experience of abuse, learning difficulties or unstable home life, are targeted by gangs for county lines activity as well as other forms of CCE. Those involved in CCE may be exploited by their peers and/or by adults, and it is important to note that children found to be exploiting their peers are also likely to be victims of exploitation themselves and therefore also in need of safeguarding support.

Signs that a young person is involved in CCE activity may include:

- Frequently going missing from school or their home
- Travelling alone to places far away from home
- Suddenly having lots of money, lots of new clothes or new mobile phones
- Receiving much more calls or texts than usual
- Found to be carrying or selling drugs
- Carrying weapons or know people that have access to weapons
- In a relationship with or hanging out with older/controlling people

- Unexplained injuries
- Becoming very reserved or seeming like they have something to hide
- Fearfulness
- Self-harming

OHC&AT staff will be alert to the signs of CCE and will attempt to identify students who are vulnerable to, or at risk of, criminal exploitation and who need services and interventions to keep them safe. We will pass on any information about CCE issues affecting our provisions to the police.

## CHILD EMPLOYMENT

Only children over the age of 13 may be employed to do light work. Regulations determine the type of work and restrict the hours a child may be employed for. Children working in the UK who are still of compulsory school age are required to have a work permit in all cases; it is illegal for a child to work and not have a work permit, even if this is in a family business. Different regulations apply to children in entertainment, where children under thirteen may be licensed to perform in commercial performances under strict guidelines and controls. Further information on children in employment can be found at https://www.gov.uk/child-employment

## CHILD ON CHILD ABUSE

Child on child abuse refers to children or young people being bullied, exploited or harmed by other children or young people. It can take place face-to-face, online, and sometimes simultaneously between the two. It includes, but is not limited to, harmful sexual behaviour, physical abuse (e.g. violence, particularly pre-planned; forcing the use of drugs or alcohol; initiation or 'hazing' type violence), emotional abuse (e.g. blackmail, extortion, threats, intimidation), bullying (including cyberbullying, prejudice-based and discriminatory bullying), sexual violence. harassment or abuse (e.g. sexual comments/remarks, indecent exposure, touching, sexual assault, rape, sharing of nude or semi-nude images including computer generated or manipulated imagery, forcing the watching of pornography, upskirting) and/or sexual exploitation (e.g. photographing or videoing indecent acts). It is also recognised that gang activity is an additional risk factor for child on child abuse.

More widely, an open and positive whole school culture is crucial to both prevent and effectively tackle such risks. Child on child abuse, particularly sexual harassment and violence, can thrive in environments where 'low level' misogyny and other discriminatory behaviours are allowed to go unchallenged. OHC&AT is clear that harassment and abusive behaviours must not be minimised or dismissed as 'banter', 'just part of growing up', 'boys will be boys' etc., and staff will challenge any such incidents or assumptions wherever they are seen or reported. We also understand that a lack of reports of any such behaviour does not indicate that it is not taking place, and staff are regularly reminded of the need to remain alert to sexual harassment and violence among students.

Students are kept informed of their options to raise complaints, concerns and make safeguarding disclosures. Details of the safeguarding team at each OHC&AT provision are clearly displayed around school and College premises, along with details of the NSPCC helpline, Report Abuse in Education – this is for children and young people who have experienced abuse at school and for worried adults who need support and guidance around such abuse. The helpline can be contacted on 0800 136 663 or via email: help@nspcc.org.uk

As with all safeguarding concerns, students may not directly disclose their experiences of child on child abuse. OHC&AT staff will remain alert to any potential indicators of child on child abuse and report any and all concerns to the DSL in line with safeguarding procedures.

**Creating a supportive environment in school and minimising the risk of child-on-child abuse**

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

Robust student induction systems ensure that OHC&AT staff are informed as to whether a student arrives or re-joins presenting a possible safeguarding concern, for example returning to school following a period in custody or having experienced serious abuse themselves. Intelligent timetabling, groupings, supervision and personalised risk assessments, including daily dynamic risk assessments, are central to the effective management of safety in our schools and College centres. Additionally, we maintain a strong focus within curriculum provision on building healthy relationships and being and keeping safe, in order to foster a positive environment and promote positive behaviour.

Staff understanding of child on child abuse is regularly updated e.g. through refresher training, daily briefings, bulletins and curriculum planning, enabling them to:

- Recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curricula help to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

**Managing allegations against other students**

When an allegation is made by a student against another student:

- The relevant DSL must be informed in line with the safeguarding procedure as laid out in this document.
- A factual written record (signed and dated) should be made of the allegation and passed to the DSL, who will decide on any immediate action necessary to safeguard those involved while the complaint is considered. No attempt at this stage should be made to investigate the circumstances.
- The DSL will contact social care services to discuss the case. It is possible that social care services are already aware of safeguarding concerns around the student. The DSL will follow through the outcomes of the discussion and make a social care services referral where appropriate.
- Where neither social care services nor the police accept the complaint, a thorough school investigation will take place in any case, using our internal procedures.
- Appropriate measures will be taken on a case-by-case basis to safeguard students involved in the allegation; this might include restructuring timetables to ensure that those involved can access their learning without sharing classrooms or other physical space, offering therapeutic support, or offering a home timetable if the student feels unable to be onsite. Where necessary or appropriate, fixed term exclusions may be given to those involved in the allegation; this will be done in line with OHC&AT and school/College policies including Behaviour, Suspension and Permanent Exclusion and/or Anti-Bullying.
- The Principal and DSL will consider any necessary or appropriate disciplinary measures on a case-by-case basis, alongside safeguarding support for all students involved.
- In situations where the DSL considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative, supervision plan which will be monitored and evaluated with all adults working with the student(s). Risk assessments will encompass all potential areas of risk including school transport.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in all affected students' files.
- If the allegation indicates a potential criminal offence has taken place, the police will be contacted at the earliest opportunity and parents/carers of all students involved in the allegation informed.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while taking necessary measures to safeguard all students affected. OHC&AT provisions will ask the police if they have any questions about the investigation.

Where a complaint is found not to raise a safeguarding concern, the Senior Leadership Team will work with the student and any other students or staff involved to investigate and resolve the matter in a positive and constructive way. All complaints and concerns raised by students will be listened to and acted upon, and the outcome clearly communicated to those involved.

## CHILD SEXUAL EXPLOITATION (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants (please note that such exchanges are coerced and should not be considered as consensual or freely given) 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.

Child sexual exploitation can take many forms, from a seemingly 'consensual' relationship where sex is exchanged for attention/affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops. It is important to note that the victim may have been sexually exploited even if the sexual activity appears consensual.

OHC&AT will be alert to the risk of CSE and will attempt to identify students who are vulnerable to, or at risk of, sexual exploitation and who need services and interventions to keep them safe. We will pass on any information about CSE issues affecting the schools, for example concerns about adults hanging around our schools or College centres, to the police.

## DOMESTIC ABUSE

OHC&AT adheres to the cross-government definition of domestic violence and abuse, which is:

*Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.*

Domestic abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Exposure to domestic abuse and/or violence, including where they see, hear or experience its effects, can have a serious, long lasting emotional and psychological

impact on children and vulnerable young people; those affected may blame themselves, feel isolated, scared or ashamed of what is happening, and may experience disruption associated with factors such as sudden house moves. Domestic abuse affecting young people can also occur within their personal relationships (teenage relationship abuse), as well as in the context of their home life.

Domestic abuse can be difficult to spot as it usually takes place within the family home and abusers are often adept at masking their behaviour in public. Children witnessing domestic abuse is recognised as 'significant harm' in law and staff should be alert to any unusual behaviour or sudden changes in behaviour such as increased aggression, anti-social behaviour or anxiety.

**ONLINE SAFETY**

The impact of technology on the lives of all citizens increases yearly, particularly for children and young people who are keen to explore new and developing technologies. Technology is transforming the way that schools teach and students learn. At home, technology is changing the way people live and the activities in which they choose to partake. Ensuring that students can safely access new technology and learn how to participate in the digital world without compromising their safety and security is a key part of delivering a well-rounded programme of education.

Developing technology brings opportunities; it also brings risks and dangers, including:

- Access/exposure to illegal, harmful or inappropriate images or other harmful content including misinformation, disinformation and conspiracy theories
- Unauthorised access to, loss of, and sharing of personal information
- Grooming
- Radicalisation
- The sharing and distribution of personal images without an individual's consent or knowledge
- Inappropriate communication and contact with others
- Cyber-bullying
- Sharing of nude or semi-nudes images and/or videos (including computer generated or manipulated imagery)
- Access to unsuitable video and internet games
- An inability to evaluate the quality, accuracy and relevance of information on the internet
- Plagiarism and copyright infringement
- Illegal downloading of music or video files
- Excessive use which may impact on social and emotional development and learning
- Risks related to geolocation facilities

OHC&AT provisions operate clear Online Safety policies which set out how we work to keep students safe while maximising the educational potential of technology. Additionally, all staff are required to abide by OHC&AT's Staff Code of Conduct and IT Acceptable Use Policy, which include clear requirements regarding safeguarding and e-safety. Governors are required to abide by OHC&AT's Governor Code of Conduct, based on the Seven Principles of Public Life.

## EXTREMISM AND RADICALISATION

**Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.

**Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.

**Terrorism** is an action that:

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

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

Radicalisation and extremism are increasingly recognised as serious threats to the safety and wellbeing of children, young people and families. OHC&AT is aware that children and young people with SEND may be more vulnerable to radicalisation into extremism or supporting terrorism.

To that end, we are committed to safeguarding students from radicalism and extremism. Safeguards in place include:

- All governors, teachers, teaching assistants and non-teaching staff have an understanding of what radicalisation is, how it happens and why we need to be vigilant in school or college; how to identify any possible concerns e.g. changes in students' behaviour which could indicate a need for help or protection; and how to report any concerns to the DSL so that further safeguarding action (including a Prevent referral) can be taken if necessary.
- All governors, teachers, teaching assistants and non-teaching staff receive regular training and updates on the Prevent duty and Channel process.
- All governors, teachers, teaching assistants and non-teaching staff understand this policy and will follow the procedure when issues arise.
- All students, parents/carers and families know that OHC&AT has policies in place to keep students safe from harm and that these policies, procedures and systems are regularly reviewed to ensure they are appropriate and effective.
- Curricula within OHC&AT provisions actively promote the understanding of British values including democracy and the rule of law, as well as supporting our students to develop good self-esteem and positive relationships with peers and other members of their communities;

- Visiting speakers to OHC&AT provisions are vetted beforehand to ensure that they are not affiliated with any extremist views or organisations, and are supervised throughout the duration of their visit to ensure that they do not promote or espouse extremist views while speaking to students or staff.

Please refer to the Anti-Radicalisation Policy, Visiting Speaker Policy and Online Safety Policy for further details.

## FABRICATED OR INDUCED ILLNESS

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in the child.

FII is also known as "Munchausen's syndrome by proxy".

FII covers a wide range of symptoms and behaviours involving parents/carers seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness. The consequences of fabricated or induced illness can be serious and long term, including impairment of children's physical, psychological and emotional development.

Behaviours in FII include a parent or carer who:

- persuades healthcare professionals that their child is ill when they're perfectly healthy
- exaggerates or lies about their child's symptoms
- manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes
- deliberately induces symptoms of illness – for example, by poisoning their child with unnecessary medication or other substances

The NHS advises clinicians and other professionals to be alert to the following as indicators of possible FII:

- symptoms only appear when the parent or carer is present
- the only person claiming to notice symptoms is the parent or carer
- the affected child has an inexplicably poor response to medication or other treatment
- if one particular health problem is resolved, the parent or carer may then begin reporting a new set of symptoms
- the child's alleged symptoms do not seem plausible – for example, a child who has supposedly lost a lot of blood but does not become unwell
- the parent or carer has a history of frequently changing GPs or visiting different hospitals for treatment, particularly if their views about the child's treatment are challenged by medical staff
- the child's daily activities are being limited far beyond what you would usually expect as a result of having a certain condition – for example, they never go to school or have to wear leg braces even though they can walk properly
- the parent or carer has good medical knowledge or a medical background
- the parent or carer does not seem too worried about the child's health, despite being very attentive

- the parent or carer develops close and friendly relationships with healthcare staff, but may become abusive or argumentative if their own views about what's wrong with the child are challenged
- one parent has little or no involvement in the care of the child
- the parent or carer encourages medical staff to perform often painful tests and procedures on the child (tests that most parents would only agree to if they were persuaded that it was absolutely necessary)

While healthcare professionals are most likely to observe the warning signs of FII, all staff should be aware of what to look out for and ensure that any safeguarding concerns regarding FII are referred to the Designated Safeguarding Lead in line with this policy.

## FEMALE GENITAL MUTILATION (FGM)

Female genital mutilation (sometimes referred to as female circumcision) is a form of so-called 'honour-based' abuse involving procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. Female genital mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone.

FGM forms part of our annual safeguarding update training for all staff. School staff should be alert to any or all of the following indicators:

- The family comes from a community that is known to practise FGM;
- A student may talk about a long holiday to a country where the practice is prevalent;
- A student may confide that she is to have a 'special procedure' or to attend a special occasion;
- A student may request help from a teacher or another adult;
- Any female child born to a woman or has a sister who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family.

It is illegal in the UK to allow girls to undergo FGM either in this country or abroad. It is important to note that teachers have a legal duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. However, **all** staff are aware that any concerns regarding FGM must be immediately shared with the DSL.

## HARMFUL SEXUAL BEHAVIOUR

Harmful sexual behaviour is defined as behaviour that is problematic, abusive and violent, and that may cause developmental damage. The NSPCC advises that harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

- Full penetrative sex with other children or adults.

It is important to note that harmful sexual behaviours can occur both online and offline, and sometimes simultaneously between the two.

Children and young people displaying harmful sexual behaviour have often experienced their own abuse and trauma, and it is imperative that they are offered appropriate support.

The NSPCC warns that sexualised behaviour which is significantly more advanced than that which is expected for the child's age, or that shows a lack of inhibition, could be cause for concern. Other warning signs the NSPCC says to look out for include:

- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex.

When considering whether behaviour is harmful, take into account the ages and stages of development of the children. Sexual behaviour can be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not). Keep in mind that it is possible for a younger child to abuse an older child, particularly where they have power over them, such as where the older child has disabilities or is small in stature.

Brook has developed a "sexual behaviours traffic light" tool which can help schools make decisions about whether sexual behaviour is harmful or natural. The tool can be accessed via this link: https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool Use of the safety planning and recording NSPCC document which is used in collaboration with the Brook Traffic Light Tool was rolled out across OHC&AT from January 2018.

OHC&AT safeguarding training includes information on harmful sexual behaviour. Detailed advice on harmful sexual behaviours is also available from local specialist violence centres – staff should contact Rape Crisis (https://rapecrisis.org.uk/) or the Survivors Trust (http://thesurvivorstrust.org/) to find their nearest centre.

Addressing harmful sexual behaviours early can prevent future problematic, abusive and/or violent behaviour.

## 'HONOUR-BASED' ABUSE (INCLUDING FORCED MARRIAGE AND FEMALE GENITAL MUTILATION)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed out of a perceived need to protect or defend the honour of a family or community. HBA encompasses forced marriage and abuses such as female genital

mutilation (FGM) and breast ironing. It is often a conspiracy of family members and associates, meaning victims are at risk from their parents and families.

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used. Someone who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the person themselves, their peer group, a relative or member of their local community, or from another professional. Forced marriage may also become apparent when other family issues are addressed e.g. domestic abuse, self-harm, child abuse or neglect. Forced marriage may involve the person being taken out of the country for the ceremony and is likely to involve non-consensual/underage sex. Refusal to go through with a forced marriage has sometimes been linked to so-called 'honour-based' abuse.

Staff **must** respond to any concerns around HBA by immediately alerting the DSL who will make a referral to Social Care and, if the risk is acute, to the Police. School staff should not treat any allegations of 'honour-based' abuse as a domestic issue and send the student back to the family home; for example, it is not unusual for families to deny that forced marriage is intended and, once aware of professional concern, they may move the student and bring forward both travel arrangements and the marriage. For this reason, staff should not approach the family or family friends, or attempt to mediate between the student and family, as this will alert them to agency involvement.

Further information and advice can be obtained from the Forced Marriage Unit www.fco.gov.uk/forcedmarriage or 020 7008 0151 and the Honour Based Abuse Helpline 0800 599 9247.

## HEALTH & SAFETY

OHC&AT operates a clear Health & Safety Policy as well as a suite of related policies and procedures across the whole organisation, including (but not limited to) core Health & Safety, Fire Safety, Risk Assessment and Personal & Intimate Care. All staff, students, visitors and other stakeholders are required to understand and abide by these policies and procedures in order to safeguard every member of the OHC&AT community.

OHC&AT acknowledges its responsibility to safeguard all students in potentially vulnerable situations such as changing rooms, while also acknowledging the student's right to privacy.

## PRIVATE FOSTERING

A private fostering arrangement is one that is made privately, without the involvement of a Local Authority, for the care of a child under the age of 16 years of age by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. Each party involved in the private fostering arrangement has

a duty to refer it to the Local Authority at least six weeks before the arrangement is due to begin, and not to do so would be an offence.

OHC&AT has a duty to inform social services if we become aware of a private fostering arrangement that has not been shared with the Local Authority. Although there is no duty for schools to be informed of private fostering arrangements it would be helpful if the family could pass on the information to ensure support can be put in place. Further information on private fostering can be found at https://www.privatefostering.org.uk

## SHARING OF NUDE AND SEMI-NUDE IMAGES AND/OR VIDEOS

The increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery) including computer generated or manipulated material e.g. deepfakes or AI-generated images. The production and sharing of such images, whether consensual or non-consensual, can expose young people to risks including embarrassment, bullying and increased vulnerability to child sexual exploitation, particularly if the imagery is shared further.

The UK Council for Child Internet Safety (UKCIS) has produced guidance for schools on responding to incidents of children and young people sharing nude and semi-nude images or videos.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically, it is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. It should also be noted that upskirting is an offence under the Voyeurism (Offences) Act 2019. Upskirting is defined in KCSIE as "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm".

Although the production of such imagery will likely take place outside of school, these issues often manifest in schools working with children and young people. Staff must respond swiftly and confidently to ensure that children are safeguarded, supported and educated.

Where staff become aware of an incident involving the sharing of youth-produced sexual imagery, they must follow UKCIS guidance:

- Report it to the Designated Safeguarding Lead (DSL) or equivalent immediately.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.

- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved.

- All incidents involving sharing of nudes or semi-nudes must be reported and responded to in line with the school's cause for concern system.
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate).
- Parents/carers should be informed at an early stage and involved in the process unless there is good reason to believe that involving them would put the young person at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

**Assessing adult-involved nude and semi-nude sharing incidents**

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

**Sexually motivated incidents**

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share

pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

**Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

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

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

**SUBSTANCE MISUSE**

OHC&AT operates a clear Substance Misuse Policy across the whole organisation, which states our commitment to safeguarding students against the risks associated with substance misuse. OHC&AT has clear expectations that no student or staff member will take part in drug-related activity as defined in our policy, and appropriate sanctions will be applied in any occurrence of substance misuse. We are also committed to providing support, advice and education about drugs and substance misuse as appropriate, both through embedded curricular provision which supports our students to make healthy choices and on a one-to-one basis as required. OHC&AT will never condone the misuse of substances or the possession or supply of illegal drugs, all of which will be viewed as a safeguarding concern.

## APPENDIX 2: INFORMATION AND GUIDANCE FOR STAFF

Below is a set of guidelines that staff should take on board when working with individual/small groups of students. It is important to be mindful at all times of your behaviour in relationship to individual/small groups of students and of the potential risk of an allegation.

**Staff should take necessary precautions in order to minimise the opportunity for an allegation to be made against them.** This is generally about exercising common sense, but all staff should specifically take note of the following:

- **Whenever possible try not to be alone in a room with a student, regardless of gender. If you are on your own with a student, leave the door open and inform a colleague if possible. Always keep an appropriate distance between you and the student.**

- **Do not engage in conversations with students about your personal life.**

- **Maintain clear professional boundaries between you and students, particularly if the conversation is regarding relationships, emotions and/or sexual content.**

- **You should not have your personal mobile phone out or be using it at any time while working with students. In particular, do not use your personal device to take photographs of students and do not show students images or other content that is on your personal device.**

- **Do not exchange mobile phone numbers with students.**

- **Do not accept students (or their family members) as 'friends' or links on social networking websites or mobile phone apps.**

- **If a student wishes to disclose personal information to you, ensure that they understand that you cannot guarantee confidentiality. Do not probe a student about their personal life unless they approach you. Avoid giving advice to students about their relationships.**

## APPENDIX 3: DEFINITIONS AND CATEGORIES OF ABUSE

All children have certain basic needs. The NSPCC gives the following definition, following Christine Cooper's checklist:

- Basic physical care: warmth, shelter, adequate food and rest, grooming (hygiene) and protection from danger
- Affection: positive physical contact, comforting, admiration, delight, tenderness, patience, time, making allowances for annoying behaviour, and general companionship and approval
- Security: continuity of care, the expectation of continuing in the stable family unit, a predictable environment, consistent patterns of care and daily routine, simple rules and consistent controls and a harmonious family group
- Stimulation and innate potential: by praise and encouragement; curiosity and exploratory behaviour; by developing skills though responsiveness to questions and to play, by promoting educational opportunities
- Guidance and control: to teach adequate social behaviour which includes discipline within the child's understanding and capacity and which requires patience and a model for the child to copy, for example in honesty and concern and kindness for others
- Responsibility: for small things at first such as self-care, tidying playthings or taking dishes to the kitchen and gradually elaborating the decision making that the child has to learn in order to function adequately, gaining experience through his/her mistakes as well as his/her stresses and receiving praise and encouragement to strive to do better
- Independence: to make his/her own decisions first about small things but increasingly about the various aspects of his/her own life within the confines of the family and society's codes. Parents and carers use fine judgement in encouraging independence and in letting the child see and feel the outcome of his or her own capacity. Protection is needed, but over-protection is as bad as responsibility and independence too early

These can be seen to extend to vulnerable adults by virtue of the factors that make those adults vulnerable e.g. learning difficulties/disabilities or other additional needs that impact on the person's growth and development. Individual cases must always be treated on their own merits, however in general terms the following definition should provide the basis for action under these guidelines: *"A child is considered to be in need of protection when the basic needs of that child are not being met through avoidable acts of either commission or omission".*

Staff should be alert to any changes in student behaviour which may indicate a safeguarding concern, including but not limited to:

- Unexplained absences or lateness
- Running away
- Self-harm
- Suicidal ideation/attempts
- Drug or alcohol misuse
- Wetting or soiling

- Deterioration in concentration and academic performance
- Anxiety
- Depression
- Avoidance of medical examination or reluctance to change for PE
- Low self-esteem and few friends
- Becoming unusually aggressive or withdrawn
- Excessive tiredness, poor sleep/nightmares
- Changes in eating habits

Before a student is placed on a Child Protection Plan a conference must decide that there is, or is a likelihood of, significant harm leading to the need for a plan. The following definitions are used for the plan. They are intended as a guide. In some instances more than one category may be appropriate.

**NEGLECT**

*The persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, or the failure to protect a child or vulnerable adult from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out an important aspect of care, likely to result in the serious impairment of the child or vulnerable adult's health and/or development.*

Neglect can have severe and long-lasting consequences. It can also be hard to identify. A student displaying multiple or persistent signs of neglect (see below) could indicate a safeguarding concern. It should also be noted that neglect often accompanies other forms of abuse.

**Signs to look out for:**

- Poor appearance and/or hygiene e.g. consistently dirty or smelly, very poor dental health, inadequate clothing for the season or occasion, unwashed clothing, hungry or without adequate provision for lunch
- Health and development problems e.g. untreated injuries or medical issues, failure to thrive, missed medical appointments, repeated accidental injuries, recurrent infections or illnesses, skin sores/rashes, malnutrition
- Indicators of possible issues around housing/family e.g. the student taking on caring responsibilities for other family members or being left alone for long periods of time

It is important to remember that neglect can occur in any family and staff should always be alert to the possibility of abuse, regardless of circumstance.

**PHYSICAL ABUSE**

*Causing physical harm to a child or vulnerable adult by hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or some other method. Physical*

*harm can also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child or vulnerable adult.*

**Non-accidental injuries**

It should not be assumed that an injury to a part of the body normally vulnerable to accidental injury has necessarily been caused accidentally. All injuries to children/vulnerable adults which do not easily come into the category of normal bumps and scrapes should be seen by a doctor.

Certain parts of the body are more commonly subjected to non-accidental injury. These include the upper arm, where a person may be gripped or shaken, the back, and the buttocks. Multiple injuries of various types, ages and location are common features of physical abuse.

Most non-accidental injuries leave marks on the body. PE teachers are therefore often key people in the identification of this form of abuse, as they regularly see students partially dressed.

**Signs to look out for:**

- Reluctance to undress or to expose parts of their bodies e.g. while changing for PE
- Unexplained absences
- Physical signs of injury
- Unexplained or confused accounts of how an injury occurred
- Explanation of an injury which appears to be inappropriate to the nature and age of the injury

**Common medical/physical factors associated with physical abuse**

<u>Bruising</u>

- Facial bruising around the mouth and ears.
- Groups of small bruises.
- Black eyes without a forehead injury, particularly if both eyes are affected.
- Weal marks or outline of bruising (e.g. hand mark).
- Bruising of soft tissue with no obvious explanation (most bruises occur on bony protuberances such as the temple or shin).
- Bruises on the back, back of legs, stomach, chest or neck.
- Bruises or cuts to mouth or tongue (e.g. split frenulum).
- Pinch marks are found in pairs and may be seen on the back, buttocks, arms or cheeks.

<u>Bites</u>

- Bites leave clear impressions of teeth and some bruising – they are never accidental.

- Parents/carers sometimes claim that bites have been made by peers or animals. It is therefore important to check the size and shape of the injury. If the impression is more than 3cms across it will have been caused by an adult or adolescent.
- Bites can be inflicted almost anywhere on the body.

Burns and scalds

- Children/vulnerable adults will sometimes suffer minor burns through hot irons etc. but it is uncommon for multiple burns to be caused accidentally.
- A cigarette burn is characteristically round but may have a tail when dragged against the skin, and is surrounded by an area of inflamed skin.
- Cigarette burns can be found in groups and can be found on any part of the body.
- Scalds from boiling water may result from lack of supervision, or non-accidentally.
- A child or vulnerable adult is very unlikely to sit down willingly in very hot water; therefore they cannot scald a bottom accidentally without also scalding the feet.
- Burns and/or scalds are particularly worrying as a degree of sadism may be involved when such injuries are inflicted.

**Associated factors**

- Injuries not consistent with explanation given by parent/carer (even if agreed by the student)
- Circumstances where parent/carer delays seeking medical advice
- A history of repeated injuries or presentation to A&E
- Consent for a medical refused by parent/carer
- Desire of a parent/carer to attribute blame elsewhere
- Distant or mechanical handling of the student by the parent/carer

## SEXUAL ABUSE

*Forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the victim is aware of or understands what is happening. Sexual abuse includes both physical contact and non-contact activities.*

**What is sexual abuse?**

Sexual abuse can be one or more of the following:

- Rape or penetration with an object or body part
- Sexual touching of any part of the body
- Forcing or encouraging a child/vulnerable adult to take part in or observe sexual activity
- Forcing or encouraging a child/vulnerable adult to undress and/or engage in sexual touching
- Grooming a child/vulnerable adult with intent to abuse them

- Involvement in the making, distributing or viewing of child abuse images
- Sexually exploiting a child/vulnerable adult

Both boys and girls can suffer from sexual abuse. Both men and women can be perpetrators – people who disclose sexual abuse from a female perpetrator are often met with disbelief. It is therefore important to listen to what a student says without being judgemental. Abusers can be relatives, friends, teachers, childcare workers, authority figures or strangers. Warning students about Stranger Danger should therefore only form part of any child protection/safeguarding programme.

**Signs to look out for:**

- Sexual interest/activity inappropriate to the student's age or developmental stage e.g. excessive preoccupation with or precocious knowledge of adult sexual behaviours
- Sexualised behaviour inappropriate to the student's age or developmental stage
- A marked fear of certain people or groups of people
- Avoidance of being alone with people
- Pregnancy in young teenagers where the identity of the father is vague or unknown
- Recurrent urinary tract infections
- Signs of sexually transmitted infections and overall dishevelled appearance

**EMOTIONAL ABUSE**

*Actual or likely severe adverse effect on the emotional and behavioural development of a child or vulnerable adult caused by persistent or severe emotional ill treatment or rejection. All forms of abuse involve some emotional ill treatment.*

Emotional or psychological abuse can be extremely detrimental to a person's development and wellbeing. The abuser may take pleasure in frightening, undermining or humiliate the victim, or deliberately try to isolate them. Emotional abuse can also take place when a caregiver is excessively protective and prevents the person from experiencing age-appropriate events. This type of abuse is very difficult to identify as there are no physical signs and behavioural indicators can be caused by many other factors.

**Signs to look out for:**

- Excessively negative and hostile behaviour towards the student e.g. threats, belittling, constant criticism
- Rejection, isolation or ignorance of the student
- Manipulation of the student through guilt, fear or other means
- Over-protection, limitation, excessive parental control of the student
- Exposure to distressing events e.g. domestic abuse or substance abuse
- Humiliation, scapegoating

- A lack of positive interaction: conditional love, threats to withdraw affection, consistent failure to offer support or praise

Behavioural definitions are very difficult to quantify because a) most children and young people experience some of these acts from time to time, and b) because the impact of a single or seldom occurring act of abuse will not have severe and harmful effects. The harm of emotional maltreatment results from the cumulative effects of repeated acts of psychological abuse.

## FINANCIAL ABUSE

*Being denied access to funds, having funds misappropriated or misused by others, being pressured or manipulated into giving money away or using it in a way the vulnerable person does not wish.*

Financial abuse occurs when a vulnerable person is exploited for someone else's personal gain. Vulnerable people may experience theft or misuse of money or possessions, be subject to fraud or scams, be pressured to share or redirect finances/resources in ways they do not wish, be prevented from accessing their money or resources, or be denied suitable care to the financial benefit of another person.

**Signs to look out for:**

- Missing personal possessions
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person

## INSTITUTIONAL ABUSE

Institutional abuse occurs when the systems and practices within a setting or service either permit through neglect or actively promote the abuse of those using the service by staff or peers. Children and vulnerable adults living in institutions such as group homes or supported living environments may be at risk of institutional abuse. The abuse itself may comprise any or all of the categories detailed above (physical, emotional, sexual, financial and neglect).

**Types of institutional abuse:**

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover, resulting in poor quality care
- Abusive and disrespectful attitudes towards service users
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to appropriately manage abusive or challenging behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to adequately support service users' medical needs e.g. not providing appropriate moving and handling support, poor upkeep of equipment such as mobility aids etc.
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

**Signs to look out for:**

- Lack of flexibility and choice for those using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters or unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support