Safeguarding and Child Protection Policy

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Senior Designated Safeguarding Lead (DSL) for child protection:
Amber Hawkeswood, Director of Safeguarding

1. Introduction

All children, young people and vulnerable adults have the right to be safe from harm and abuse.

Vision for Education, ABC Teachers and Smart Teachers believe that a child, young person or vulnerable adult should never experience harm or abuse of any kind. We recognise that we have a statutory responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults and to keep them safe. At Vision for Education, ABC Teachers and Smart Teachers we are committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and we expect everyone who works in schools or alternative learning provisions, including online tuition, to share this commitment. We take all welfare concerns seriously and believe that all children, young people and vulnerable adults have a right to be heard and to have their wishes and feelings taken into account. We will always act in the best interest of the child, young person or vulnerable adult.

Safeguarding and promoting the welfare of children is defined in the Department for Education's 'Keeping Children Safe in Education' 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

We will fulfil local and national responsibilities as wholly as possible as a supply agency. This policy has been drawn up on the basis of law and guidance (statutory and non-statutory) that seeks to protect children, young people and vulnerable adults, namely:

- Safeguarding Vulnerable Groups Act 2006
- Childcare Act 2006
- Disqualification under the Childcare Act 2018
- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Human Rights Act 1998
- Sexual Offences Act 2003
- Education Act 2011
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2025
- SEND Code of Practice 0 to 25 years
- Behaviour in schools: advice for headteachers and school staff 2024

All staff must read and understand Part One of 'Keeping Children Safe in Education 2025'. Staff should also read Safer Recruitment Consortium's 'Guidance for safer working practice for those working with children and young people in education settings'. Staff are given access to copies of these guidance documents as part of the registration process.

Additional government resources that have also been taken into consideration can be found below:

- What to do if you're worried a child is being abused.
- Information sharing
- Mental health and behaviour in schools

All staff are expected to maintain and update their knowledge about what constitutes abuse and to know the signs and symptoms of abuse.

We are committed to ensuring that all staff are sensitive to issues of race, culture, gender and diversity, but these issues should never be a barrier to sharing and reporting concerns about children, young person or vulnerable adult.

All staff, including permanent and temporary supply teaching, non-teaching support staff, online tutors and clerical and domestic staff, have a statutory responsibility to safeguard and promote the welfare of children, young people and vulnerable adults and must be aware of and fully conversant with this policy. All staff must have access to and observe this policy, whilst also adhering to the client school's procedures and guidance at all times. For the purposes of this document, the term 'staff' will apply to those listed above.

Because of their day-to-day contact with children, young people and vulnerable adults, staff are well placed to observe possible signs of abuse.

It is neither the role, nor responsibility, of those working with children, young people or vulnerable adults in a school, alternative provision or in an online setting, to assess, diagnose or investigate whether a child, young person or vulnerable adult is at risk of or suffering harm or abuse. It is the responsibility of all staff to be aware of the need to report any concerns to the school/setting's Designated Safeguarding Lead (DSL) as a matter of priority, or to one of the Deputy Designated Safeguarding Leads (DDSL) in his/her absence.

This policy is made available to all staff and must be read along with:
- The Department for Education's 'Keeping Children Safe in Education (2025) (Part One), and
- Staff Code of Conduct.

This policy should be used in addition to the school/setting's:
- Behaviour Policy, and
- Safeguarding and Child Protection Policy.

2. Overall aims

Vision for Education, ABC Teachers and Smart Teachers believe that a child, young person or vulnerable adult should never experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people and vulnerable adults and to keep them safe. We are committed to good practice which seeks to protect them.

The purpose of this policy is to:

- Protect children, young people and vulnerable adults who receive the services of Vision for Education, ABC Teachers and Smart Teachers.
- Provide all staff (permanent and temporary) with the overarching principles that guide our approach to child protection and the safeguarding of children, young people and vulnerable adults.
- Raise staff awareness of the need to safeguard children, young people and vulnerable adults, and their responsibilities in identifying concerns and reporting them as a matter of priority.
- Provide a framework to support staff in identifying concerns that a child, young person or vulnerable adult may be suffering harm or abuse, thereby enabling them to report those concerns without delay.
- Help staff to contribute to an environment where children, young people and vulnerable adults feel secure and are listened to and contribute to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect and shared values.
- Identify and protect the most vulnerable, identify individual needs where possible and develop plans to meet those needs.

3. The categories of abuse and signs and indicators

All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. All supply staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse is a form of maltreatment of a child, young person or vulnerable adult. Someone may abuse or neglect a child, young person or vulnerable adult by inflecting harm or by failing to act to prevent harm.

Children, young people and vulnerable adults may be abused in a family or in an institutional or community setting by those known to them, or, more rarely, by others not known to them (e.g. via the Internet). They may be abused by an adult, adults or another child, young person or vulnerable adult.

Staff must be aware of wider safeguarding issues that can put children, young people and vulnerable adults at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) put children in danger.

There are four categories of abuse. The definition of each category is set out below, with a non-exhaustive list of possible signs and symptoms.

1. Physical

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

Recognising physical abuse:

- Unexplained injuries or burns, particularly if they are recurrent.
- Refusal to discuss injuries.
- Improbable explanations for injuries or parent(s)/carer(s) undisturbed by accident/injury.
- Untreated injuries or lingering illness not attended to.
- Admission of punishment which appears excessive.
- Shrinking from physical contact.
- Fear of returning home or of parent(s)/carer(s) being contacted.
- Fear of undressing.
- Fear of medical help.
- Aggression/bullying.
- Over compliant behaviour or a 'watchful attitude'.
- Running away.
- Significant changes in behaviour without explanation.
- Deterioration in work.
- Unexplained pattern of absences which may serve to hide bruises or other physical injuries.

Bruising

Children, young people and vulnerable adults can have accidental bruising. The following must be considered as indicators of harm, unless there is evidence or an adequate explanation provided. Only a paediatric view around such explanations will be sufficient to dispel concerns listed:

- Any bruising to a pre-crawling or pre-walking baby.
- Bruising in or around the mouth, particularly in small babies, which may indicate force feeding.
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, although a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on parts unlikely to be injured accidentally.
- Variation in colour, possibly indicating injuries caused at different times.
- The outline of an object used (e.g., belt marks, handprints, or a hairbrush).
- Bruising or tears around, or behind, the earlobe(s) indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.

Bite marks

Human bite marks are oval or crescent shaped. If they are over 3cm in diameter, they are more likely to be made by an adult or older child.

Burns and scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds - experienced medical opinion is required. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns along the protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of their own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds, which did not have appropriate treatment or adequate explanation.
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint, and loss of function in the limb or joint. Non-mobile children, young people or vulnerable adults rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay, when the fracture has caused symptoms such as swelling, pain or loss of movement.
- There is an unexplained fracture in the first year of life.

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

2. Emotional

Emotional abuse is the persistent emotional maltreatment of a child, young person or vulnerable adult, such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children, young people or vulnerable adults. These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing them frequently to feel frightened or in danger, or the exploitation or corruption of children, young people or vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a child, young person or vulnerable adult, though it may occur alone.

Recognising emotional abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical.

The indicators of emotional abuse are often also associated with other forms of abuse. Professionals should therefore be aware that emotional abuse might also indicate the presence of other kinds of abuse.

The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child and parent (e.g., anxious, indiscriminate or no attachment).
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Appeasing behaviour towards others.
- Scapegoated within the family.
- Frozen watchfulness - particularly in pre-school children.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a loner – difficulty relating to others.
- Continual self-deprecation.
- Fear of new situations.
- Inappropriate emotional responses to painful situations.
- Self-harm or mutilation.
- Compulsive stealing/scrounging.
- Drug/solvent abuse.
- Neurotic behaviour – obsessive rocking, thumb sucking and so on.
- Air of detachment – don't care attitude.
- Social isolation – does not join in and has few friends.
- Desperate attention-seeking behaviour.
- Eating problems including overeating and lack of appetite.
- Depression and withdrawal.

3. Sexual

Sexual abuse involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children, young people or vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children, young people or vulnerable adults to behave in sexually inappropriate ways, or grooming a children, young person or vulnerable adult in preparation for abuse (including via the internet).

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

Recognising sexual abuse

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience for a child, young person or vulnerable adult. Therefore, both identification and disclosure rates are deceptively low.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. According to a recent Office for National Statistics (ONS) study, three-quarters (72%) of sexually abused children did not tell anyone about the abuse at the time. Twenty-seven percent of the children told someone later, and around a third (31%) still had not told anyone about their experience(s) by early adulthood.

If a child, young person or vulnerable adult makes an allegation of sexual abuse, it is very important that they are taken seriously. Allegations can often initially be indirect as the child, young person or vulnerable adult tests the professional's response. There may be no physical signs and indications are likely to be emotional/behavioural.

Behavioural indicators which may help professionals identify child sexual abuse include:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play or conversation inappropriate to the person's age.
- Contact or non-contact sexually harmful behaviour.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including an eating disorder), self- mutilation and suicide attempts.
- Involvement in sexual exploitation or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes e.g., sports events (but this may be related to cultural norms or physical difficulties).

Physical indicators associated with child sexual abuse include:

- Pain or itching of genital area. Scratches, abrasions or persistent infections in the anal or genital regions.
- Bruises, scratches, burns or bite marks on the body.
- Blood on underclothes.
- Pregnancy in a child, young person or vulnerable adult.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease or presence of semen on vagina, anus, external genitalia or clothing.

Other signs of sexual abuse:

- Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father.
- Sexual awareness inappropriate to the person's age, for example in drawings, vocabulary, games and so on.
- Frequent public masturbation.
- Attempts to teach other children, young people and vulnerable adults about sexual activity.
- Refusing to stay with certain people or go to certain places.
- Aggressiveness, anger anxiety and tearfulness.
- Withdrawal from friends.
- Frequent vaginal infections, discharge or odours.
- Sexually transmitted diseases.

Possible signs of sexual abuse in older children, young people or vulnerable adults:

- Promiscuity, prostitution and provocative sexual behaviour.
- Self-injury, self-destructive behaviour and suicide attempts.
- Eating disorders.
- Tiredness, lethargy and listlessness.
- Over-compliant behaviour.
- Sleep disturbances.
- Unexplained gifts of money.
- Depression.
- Changes in behaviour.
- Non-attendance at school.
- Talking about a new 'special' friend.

Sex offenders have no common profile, and it is important for professionals to avoid attaching any significance to stereotypes around their background or behaviour. While media interest often focuses on 'stranger danger', Ministry of Justice, Home Office and the Office for National Statistics' research indicates that as much as

80 percent of sexual offending occurs in the context of a known relationship, either family, acquaintance or colleague.

4. Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child, young person or vulnerable adult from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers), and/or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, the basic emotional needs of a child, young person or vulnerable adult.

Recognising neglect

It is rare that an isolated incident will lead to agencies becoming involved with a neglectful family. Evidence of neglect is built up over a period of time. Professionals should therefore compile a chronology and discuss concerns with any other agencies which may be involved with the family, to establish whether seemingly minor incidents are in fact part of a wider pattern of neglectful parenting.

When working in areas where poverty and deprivation are commonplace, professionals may become desensitised to some of the indicators of neglect. These include:

- Failure by parents or carers to meet essential physical needs (e.g., adequate or appropriate food, clothes, warmth, hygiene and medical or dental care).
- Failure by parents or carers to meet essential emotional needs (e.g., to feel loved and valued, and to live in a safe, predictable home environment).
- A child, young person or vulnerable adult who is seen to be listless, apathetic and unresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- A child, young person or vulnerable adult thriving away from their home environment.
- A child or young person with unexplainable and or/persistent absences from education.
- A child, young person or vulnerable adult left with inappropriate carers (e.g., too young or complete strangers).
- A child, young person or vulnerable adult left with adults who are intoxicated or violent.
- A child, young person or vulnerable adult abandoned or left alone for excessive periods.

Disabled children, young people and vulnerable adults can be particularly vulnerable to neglect due to the increased level of care they may require.

Although neglect can be perpetrated consciously as an abusive act by a parent or carer, it is rarely an act of deliberate cruelty. Neglect is usually defined as an omission of care by the parent or carer, often due to one or more unmet needs of their own. These could include domestic abuse, mental health issues, learning disabilities, substance misuse, or social isolation/exclusion, however, this list is not exhaustive.

While offering support and services to these parents or carers, it is crucial that professionals maintain a clear focus on the needs of the child, young person or vulnerable adult.

Possible signs of neglect:

- Constant hunger.
- Poor personal hygiene.
- Inappropriate clothing.
- Frequent lateness or non-attendance at school.
- Untreated medical problems.
- Low self-esteem.
- Poor social relationships.
- Compulsive stealing or scrounging.
- Constant tiredness.

Signs to watch out for:

- Signs of low self-esteem.
- Repeated talk of failure.
- Deliberately seeking failure.
- Denial or destruction of anything good.
- Rejection of praise.

- Pleasure in criticism.
- Clowning, acting big and telling tall stories.

Verbal signs of distress:

- Self-denigration.
- Worthlessness.
- Pessimism.
- Hopelessness.
- Morbid thinking.
- Suicidal thoughts*.
- Pathological thinking.
- Self-blame.

Non-verbal signs of distress:

- Loss of interest and withdrawal.
- Irritability and tearfulness.
- Tiredness and change in weight.
- Poor concentration and deterioration of work.
- Destructive behaviour*.
- Morbid artwork and writing*.
- Lack of self-care (deliberate)*.
- Deliberate failure*.
- Self-harming*.
- Suicide attempts*.
- Arson*.
- * Particularly significant and should never be ignored.

4. Preventative Education

All of our staff will be expected to play a role in preventative education as part of a whole school approach. Preventative education prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. Please refer to the individual school programme for further information.

5. Children, young people or vulnerable adults with additional needs and/or disabilities

We recognise that children, young people or vulnerable adults with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline The risks to children, young people or vulnerable adults with additional needs and/or disabilities may be increased by their need for practical assistance and physical dependency, including intimate care, which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated.

Additional barriers can exist when recognising abuse, neglect and exploitation in this group. This can include:

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

Further information on safeguarding disabled children and young people is available in the government's document 'Safeguarding Disabled Children - Practice Guidance'.

Further useful resources are available at:

- SEND Code of Practice 0 to 25 years, and
- Supporting Pupils at School with Medical Conditions.

And from specialist organisations such as:

• The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)

• Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

• NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

Staff working with children, young people or vulnerable adults in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern. Staff should have a detailed knowledge of students' individual care needs (as well as their academic needs) and take these into account when working with them and their families. Concerns should be shared immediately with the school/setting's DSL or deputy DSL.

All staff working with children, young people or vulnerable adults with special educational needs or disabilities will receive appropriate training to enable them to meet the needs of these children, young people and vulnerable adults appropriately and to recognise and report any concerns.

When working with children, young people or vulnerable adults with disabilities, staff must be aware that additional possible indicators of abuse, neglect and/or exploitation may also include:

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

6. Child-on-child abuse and bullying

Children, young people and vulnerable adults can abuse other children, young people and vulnerable adults, and all staff should be aware safeguarding issues can manifest themselves via child-on-child abuse.

This is most likely to include, but not limited to:
• bullying (including cyberbullying, prejudice-based and discriminatory bullying);
• abuse in intimate personal relationships between peers.
• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise.
• causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
• sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
• sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
• causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
• consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
• upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
• initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All child-on-child abuse is unacceptable. Abuse is abuse and should never be tolerated or passed off as banter or part of growing up. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched or assaulted or boys being subject to initiation -type violence.

We believe that all children, young people and vulnerable adults have a right to attend school and learn in a safe environment. Children, young people and vulnerable adults should be free from harm by adults in the school/ alternative provision and other students. Boarding schools, residential special schools, residential colleges and children's homes have additional factors to consider with regard to safeguarding. Schools and colleges that provide such residential accommodation and/or are registered as children's homes should be alert to signs of abuse in such settings (for example, inappropriate pupil or student relationships and the potential for child-on-child abuse, particularly in schools and colleges where there are significantly more girls than boys or vice versa) and work closely with the host local authority and, where relevant, any local authorities that have placed their children there.

While bullying between children, young people and vulnerable adults is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child, young person or vulnerable adult's wellbeing and, in very rare cases, has been a feature in the suicide of some young people and vulnerable adults.

All incidences of bullying, including cyber-bullying, prejudice-based and discriminatory bullying, should be reported.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.

All staff who work directly with children, young people and vulnerable adults must read the Department for Education's 'Keeping Children Safe in Education 2025', which contains additional information about specific forms of abuse.

All staff should be clear as to the school/setting's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

KCSIE Sept 2025 has added a link to Lucy Faithfull Foundation's 'Shore Space' which is a confidential chat service that supports young people who are concerned about their own or someone else's sexual thoughts and/or behaviours.

7. Children who are lesbian, gay, bi, or trans (LGBT), and gender questioning children

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to government Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Government gender questioning children guidance is still under review, however KCSIE Sept 2025 provides a link to drafted guidance on RSHE which will be introduced in September 2026. The guidance aims to provide children and young people with the knowledge to make informed and ethical decisions regarding their health, relationships and wellbeing.

Sexual Violence and Sexual Harassment

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Staff who receive a report of sexual assault or sexual harassment must report this to the school/setting's DSL or deputy DSL without delay. The school must follow their procedures for responding to and managing reports of sexual assault and sexual harassment in accordance with Part 5 of Keeping Children Safe in Education.

Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Schools should remain alert to the possible challenges of detecting those sighs and show sensitivity to the needs of the child (e.g., about attendance in lessons) irrespective of how overt the child's distress is.

8. Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Please familiarise yourself with the school or setting's online safety policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: 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; for example: 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Please ensure that when asking pupils to access online material whether in class or at home, these sites have been previously vetted to ensure suitability.

- The following resources, plus many more listed in Annex B of Keeping Children Safe in Education 2025, may also help schools and colleges understand and teach about safeguarding:
- DfE advice for schools: teaching online safety in schools
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people

- The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme
- Public Health England: Every Mind Matters
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

9. Children with sexually harmful behaviour

Children and young people may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school/provision's anti-bullying procedures where necessary. However, there will be occasions when a child or young person's behaviour warrants a response under local authority child protection rather than anti-bullying procedures. ONS research indicates that up to 30% of child sexual abuse is committed by someone under the age of 16.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Children and young people who display such behaviour may be victims of abuse themselves, and child protection procedures will be followed for both the victim and perpetrator. Staff who become concerned about a pupil's sexualised behaviour should speak to the school/provision's DSL or deputy DSL as soon as possible.

10. Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 recognizes abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The Adoption and Children Act 2002 expanded on the types of abuse that a child may witness, stating that 'it is broader than physical violence and includes sexual abuse and forms of ill - treatment which are not physical. Any harm a child suffers because a parent is being harassed or intimidated is caught by the definition of "harm"'.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child - on- child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to control, harm, punish, or frighten their victim. This definition, which is not a legal definition, includes so-called 'honour'-based abuse, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

The harm caused to children, young people and vulnerable adults can be significant – through emotional and physical abuse and/or neglect. From 2002, the definition of significant harm was amended to include "the harm that children suffer by seeing or hearing the ill-treatment of another, particularly in the home".

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school/setting and/or can occur between children, young people and vulnerable adults outside of these environments. All staff, but especially the DSL and deputy DSL, should consider whether children, young people or vulnerable adults are at risk of abuse or exploitation in situations outside their families.

Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

If staff are aware that a child, young person or vulnerable adult is witnessing or hearing domestic abuse, they should inform the school/setting's DSL or deputy DSL, who should in turn refer to the appropriate public agency.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps the police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline (NDAH), which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. NDAH's website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. They also have an online form, where support phone calls can be booked, at a safe time to call a victim.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC - UK domestic-abuse Signs Symptoms Effects
- Refuge: What is domestic abuse?
- Safelives: young people and domestic abuse
- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass) (includes information for schools on the impact of domestic abuse on children)

11. Mental health

All agency staff are aware that mental health problems can, in some cases, be an indicator that a child, young person or vulnerable adult has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Agency staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. Where staff have a mental health concern about a child, young person or vulnerable adult that may also be a safeguarding concern, immediate action should be taken and they should raise the issue by informing the school/setting's DSL or deputy DSL. Information regarding the specific school/setting's DSL should be issued to staff by each school/setting at the start of the booking. For online tutors who do not have access to the corresponding school/setting's DSL or deputy DSL's contact details, or where contact cannot be made, they should then contact the agency Senior DSL or DSL using the contact information which is listed in this policy, and is also available within the online tutoring platform, without delay.

12. Serious violence

All staff should be aware of indicators which may signal that children, young people or vulnerable adults are at risk from, or are involved with, serious violent crime. **These following indicators could suggest that a child, young person or vulnerable adult has been approached by, or are involved with, individuals associated with criminal networks or gangs:**

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm
- a significant change in wellbeing
- signs of assault or unexplained injuries, and or
- unexplained gifts or new possessions.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's 'Preventing Youth Violence and Gang Involvement' guidance.

13. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person into any criminal activity:

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

The victim may have been criminally exploited, even if the activity appears consensual. CCE does not always involve physical contact, it can also occur through the use of technology. CCE can include children and young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other children or young people.

Some of the following can be indicators of CCE. Children or young people who:

- Appear with unexplained gifts or new possessions.
- Associate with other children or young people involved in exploitation.
- Suffer from changes in emotional wellbeing.
- Misuse drugs and alcohol.
- Go missing for periods of time or regularly come home late.
- Regularly miss school or education or do not take part in education.

The above CCE indicators can also be indicators of Child Sexual Exploitation (CSE), as can children or young people who:

- Believes they are in a healthy relationship with an adult male/female.
- Suffer from sexually transmitted infections or become pregnant.

The key indicators of CSE can include:

- Acquisition of money, clothes, and mobile phones etc. without plausible explanation.
- Gang-association and/or isolation from peer or social networks.
- Exclusion or unexplained absences from school, college or work.
- Leaving home or care without explanation and persistently going missing or returning late.
- Excessive receipt of texts or phone calls.
- Returning home under the influence of drugs or alcohol.
- Inappropriate sexualised behaviour for age or sexually transmitted infections.
- Evidence of or suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours.
- Self-harm or significant changes in emotional wellbeing.

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person 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.

CSE does not always involve physical contact - it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity, and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

Staff should be aware that victims of CSE often do not recognise themselves as such.

Although the following vulnerabilities increase the risk of CSE, it must be remembered that not all children and young people with these indicators will be exploited. CSE can occur without any of these issues:

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe or stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality for example).
- Recent bereavement or loss.
- Social-isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity.

Further information on CSE can be found in the government's 'Child Sexual Exploitation: Definition and a Guide for Practitioners (DfE 2017)'.

Although inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

If staff suspect a child or young person has been sexually exploited or is at risk of sexual exploitation, they must share the information with the school/setting's DSL, deputy DSL or Headteacher without delay.

The Department for Education's guidance on 'What to do if you think a child is being sexually abused' can be found on the .Gov website.

14. County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other forms of deal line.

Exploitation is an integral part of the county lines offending model, with children, young people and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children, young people and vulnerable adults can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children, young people and vulnerable adults are often recruited to move drugs and money between locations and are known to be exposed to techniques such as plugging, where drugs are concealed internally to avoid detection.

Children, young people and vulnerable adults can easily become trapped by this type of exploitation, as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

If a child, young person and vulnerable adult is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered, alongside consideration of availability of local services or third sector providers, who can offer support to victims of county lines exploitation.

Further information regarding county lines can be found in Home Office 'Criminal Exploitation of Children and Vulnerable Adults: County Lines' guidance.

15. Trafficked and exploited children

A trafficked child or young person is coerced or deceived by the adult who brings them into the country. Trafficked children and young people are denied their human rights and are forced into exploitation e.g., domestic servitude, forced marriage, criminal activity, begging, benefit fraud, acting as a drug mule, sweatshop or

restaurant work. Children and young people may appear to submit willingly through fear for themselves or their family, because their parents have agreed to the situation or because of bribes.

Recognition of trafficked and exploited children and young people will normally rely on a combination of general signs of abuse and/or neglect and issues concerned with the child or young person's immigration status. These children and young people may not be in possession of their own travel documents, be excessively afraid of being deported, be in possession of false papers, being cared for by an adult who is not their parent and/or presenting with a history of missing links and unexplained moves. Supply staff should report concerns to the school/setting's DSL or deputy DSL, so that a referral can be made.

For more guidance, please see the Government's guidance on Safeguarding children and young people who may have been trafficked.

16. Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims.

17. Preventing Radicalisation and The Prevent Duty

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of those with different faiths and beliefs.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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 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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. Where staff are concerned that children, young people or vulnerable adults are developing extremist views, are susceptible to, or show signs of becoming radicalised, they should discuss this with the school/setting's DSL. They will have received training about the Prevent Duty and tackling the ideological causes of extremism and will be able to support staff with any concerns they may have. Staff should be alert to changes in the behaviour of children, young people and vulnerable adults, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children, young people and vulnerable adults who might be at risk of radicalisation and act proportionately, which may include the school/setting's DSL or deputy DSL making a Prevent Referral.

As part of the Counter Terrorism and Security Act 2015, schools have a duty to prevent people being drawn into terrorism. This has become known as the Prevent Duty. As an agency, we will support schools in this duty as wholly as possible.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people and vulnerable adults do not become involved in extremist action. For this

reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

Recognising early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes.
- Glorifying violence, especially to other faiths or cultures.
- Making remarks or comments about being at extremist events or rallies outside school.
- Evidence of possessing illegal or extremist literature.
- Advocating messages similar to illegal organisations or other extremist groups.
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people and vulnerable adults can come across online, so involvement with particular groups may not be apparent).
- Secretive behaviour.
- Online searches or sharing extremist messages or social profiles.
- Intolerance of difference including faith, culture, gender, race or sexuality.
- Graffiti, artwork or writing that displays extremist themes.
- Attempts to impose extremist views or practices on others.
- Verbalising anti-western or anti-British views.
- Advocating violence towards others.

Please see the link below for more information about the free PREVENT training course offered by the government. At the end of the course, you will be provided with a certificate of completion, which you should forward to your consultant to be added to your training record.

https://www.support-people-susceptible-to-radicalisation.service.gov.uk/prevent-duty-training-learn-how-support-people-susceptible-radicalisation

18. Early Help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. All staff should be aware of their local early help process and understand their role in it.

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Any child may benefit from early help, but all school and college staff should 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.

If early help is appropriate, the designated safeguarding lead (or a deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Please raise any concerns you may have to the school/setting's DSL without delay so that early help can be considered.

19. Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

• The department's statutory guidance on school attendance 'Working together to improve school attendance' which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

• Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: 'Children Missing Education'.

• further information for colleges providing education for a child of compulsory school age can be found in: 'Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges'.

• general information and advice for schools and colleges can be found in the Government's 'Missing Children and Adults Strategy'.

Virtual School Heads

Virtual School Heads (VSHs) manage pupil premium plus funding for looked-after children, working with designated teachers to ensure it supports progress and meets needs identified in personal education plans. They also promote the achievement of previously looked-after children.

Since the Children and Social Work Act 2017, VSHs have responsibilities for children who have left care through adoption, special guardianship, or child arrangement orders, including those adopted from state care outside England and Wales—mainly by providing advice and information.

Their role expanded in June 2021 to include non-statutory oversight of attendance, attainment, and progress of children with a social worker, requiring engagement with key professionals (e.g. safeguarding leads, social workers, SENCOs, mental health leads).

In September 2024, VSHs gained a further non-statutory duty to promote the educational achievement of children in kinship care.

Guidance documents:

- Promoting the education of looked-after and previously looked-after children (statutory guidance)
- Promoting the education of children with a social worker (non-statutory guidance)

20. Alternative Provision

The Keeping Children Safe in Education 2025 guidance sets out safeguarding responsibilities in relation to pupils in Alternative Provisions. When a school places a pupil with an Alternative Provision (AP) provider, the school retains full safeguarding responsibility for that pupil. The school must ensure that the placement is appropriate and meets the pupil's individual needs.

Pupils in AP often have complex needs and may face increased safeguarding risks. Schools must obtain written confirmation from AP providers that:

- All necessary safeguarding checks (the same as for school staff) have been completed on individuals working with pupils.

- They will inform the commissioning school of any staff changes or other arrangements that could affect pupil safety.

Schools must always know where pupils are during school hours, including:
- The address of the AP provider.
- Any subcontracted provision or satellite sites attended.

Schools should review AP placements at least half-termly to check:
- The pupil is attending regularly.
- The placement remains safe and continues to meet the pupil's needs.
- If safeguarding concerns arise, the placement should be immediately reviewed and, if necessary, terminated until concerns are fully resolved.

21. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.

• denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on- line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Schools and colleges should consider taking appropriate action to meet the 'Cyber security standards for schools and colleges' which were developed to help them improve their resilience against cyber-attacks.

22. Filtering and Monitoring

Schools and colleges must have filtering and monitoring processes in place on school devices and school networks. The school or college should have a clear policy on the use of mobile and smart technology, which will also reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Schools and colleges should carefully consider how this is managed on their premises and reflect this in their mobile and smart technology policy and their child protection policy. It is important to read each organisation's policy as there are different systems used across different sites. The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department for Education. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at: https://saferinternet.org.uk/blog/filtering-and-monitoring-webinars-available

Keeping Children Safe in Education guidance states that filtering and monitoring standards set out for schools and colleges should:
- Identify and assign roles and responsibilities to manage filtering and monitoring systems

- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs
- Schools can use the department's 'plan technology for your school service' to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

Supply Staff Responsibilities in relation to Filtering and Monitoring

As a member of supply staff working in schools and colleges, you must be aware of the following:

- All staff, including supply staff, have a responsibility to contribute to the school's successful filtering and monitoring of their IT systems.
- All staff should know how to report and record concerns about a student's IT use – ensure you know how to report concerns to the school's DSL from the start of each placement.
- If you are concerned that a student has accessed something unsuitable, don't assume that it has been picked up by the filtering and monitoring system. You might report something that you overhear a young person mention they have accessed on the school system, or it could be something that they access in a lesson. Any concerns need to be reported to the DSL, who holds the responsibility for filtering and monitoring within their school.
- Report if you have been able to access unsuitable material on a school device.
- It can be helpful if you speak to the DSL and IT team in advance if you know that you will be teaching topics that will create unusual activity that could alert the IT monitoring system.
- Report if there is a failure in the software or abuse of the system, for example, if you notice abbreviations or misspellings that allow access to restricted material.

The Department for Education has also published 'Generative AI: product safety expectations' to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

23. Forced marriage, so-called 'honour'-based abuse and killings

So-called 'honour'-based abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community including female genital mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

It is an offence to force someone to marry against their will - Section 74 of the Serious Crime Act 2015. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).
- Breaching a Forced Marriage Protection Order is also a criminal offence.
- The civil remedy of obtaining a Forced Marriage Protection Order through the family courts will continue to exist alongside the new criminal offence, so victims can choose how they wish to be assisted.

Guidance on dealing with concerns regarding forced marriage is contained in the government's 'Handling Cases of Forced Marriage: Multi-Agency Practice Guidelines'

A forced marriage is distinct from a consensual, arranged marriage because it is without the valid consent of both parties and duress is a factor. A child or young person 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 child or young person themselves, the child or young person's peer group, a relative or member of the child or young person's local community or from another professional. Forced marriage may also become apparent when other family issues are addressed, eg domestic abuse, self-harm, child abuse or neglect, family/young person conflict, a child with unexplainable and or/persistent absences from education or a missing child/runaway.

Where staff are concerned that a child or young person might be at risk of so-called HBA or forced marriage, they must contact the school/setting's DSL or deputy DSL as a matter of urgency.

Forced marriage may involve the child or young person being taken out of the country for the ceremony, is likely to involve non-consensual/under-age sex and refusal to go through with a forced marriage has

often been linked to so-called 'honour' killing or violence. The Marriage and Civil Partnership (Minimum Age) Act 2022 raised the age of marriage and civil partnership to 18 in England and Wales. The Minimum Age Act expands upon the criminal offence of forced marriage in England and Wales, making it an offence to do anything intended to cause a child to marry before they turn 18 – this also includes encouraging the marriage of children, and is not limited to intimidation or coercive behaviour.

It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the child or young person and bring forward both the travel arrangements and marriage. For this reason, staff should not approach the family or family friends, or attempt to mediate between the child or young person and family.

24. Female genital mutilation

It is illegal in the UK to subject a child or young person to female genital mutilation (FGM) or to take a child or young person abroad to undergo the procedure – Female Genital Mutilation Act 2003.

Despite the harm it causes, FGM practising communities consider it normal to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood.

Staff should be alert to the following indicators:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the toilet due to difficulties urinating.
- Long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college.
- Prolonged absence from school or college with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- Reluctantly to undergo normal medical examinations.
- Anxious, depressed and emotionally withdrawn.
- Sudden decline in performance, aspirations or motivation

A girl may:

- Confide in a professional.
- Ask for help, but may not be explicit about the problem due to embarrassment or fear.
- Talk about pain or discomfort between her legs.

Where staff are concerned that a child or young person might be at risk of FGM, they must contact the school/ setting's DSL or deputy DSL as a matter of urgency. Any information or concern that a child or young person is

at immediate risk of, or has undergone, FGM will result in a child protection referral. Staff should be alert to the need to act quickly and not to mediate with or alert parents to professionals' concerns.

FGM is a form of child abuse common to some African, Asian and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual leaves victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and often without anesthetic, it involves the partial or total removal of the external female genital organs.

Talking about FGM can be difficult and upsetting. Staff may wish to speak with their DSL if they are affected by what they have heard.

Female Genital Mutilation reporting procedures:
Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2025), says 'whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. What is often less well-known is what a teacher should do next to make a report. Below is a very short summary and must be read in conjunction with the mandatory reporting guidance. The mandatory reporting procedures say: 'It is recommended that you make a report orally by calling 101, the single non-emergency number. 'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialing 999 if appropriate'. In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'. The procedures also set out what information is needed, in order to make a report.

See here: https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

25. Private fostering

Private fostering is a term used when someone who is not a parent or a 'close relative' is looking after a child or young person under the age of 16 (under 18 if they are disabled) for 28 days or more in their own home. The Children Act 1989 defines a close relative as a grandparent, uncle or aunt, sibling or step-parent (whether by full-blood, half-blood or by marriage).

Whilst most privately fostered children and young people are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child or young person has come from another country. In some cases, privately fostered children and young people are affected by abuse, neglect or exploitation, or can be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools and settings have a mandatory duty to report to the local authority where they are aware or suspect that a child or young person is subject to a private fostering arrangement.

In order to fully support this, supply staff should notify the school/setting's DSL or deputy DSL when they become aware of private fostering arrangements.

The DSL will speak to the family of the child or young person involved to check that they are aware of their duty to inform the Local Authority (LA). The school itself has a duty to inform the LA of the private fostering arrangements.

26. The Human Rights Act 1998

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific Convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,25 and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission

We will wholly assist schools and colleges with their obligations under the Equality Act 2010 (the Equality Act).

27. Dealing with disclosures

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Receive:

- Listen to what is being said without displaying shock or disbelief.
- Accept what is said.
- Make a note of what has been said as soon as practicable.

Reassure:

- Reassure the child, young person or vulnerable adult, but only so far as is honest and reliable. For example, don't make promises you may not be able to keep, such as. 'I'll stay with you' or 'everything will be alright now'.

• Do reassure and alleviate guilt if the child, young person or vulnerable adult refers to it. For example:

"I believe you."
"I am glad you came to me."
"I am sorry this has happened."
"You're not to blame. You are not alone. You are not the only one this sort of thing has happened "We are going to do something together to get help."

• Do not promise to keep it a secret as your professional responsibilities may require you to report the matter. If you make this promise to a child, young person or vulnerable adult and then break it, you confirm to them yet again that adults are not to be trusted.

React:

• React to the child, young person or vulnerable adult only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
• Do not ask leading questions, for example 'what did they do next?'. Such questions may invalidate your evidence (and theirs) in any later prosecution in court.
• Do not criticise the alleged perpetrator as the child, young person or vulnerable adult may care about him/ her and reconciliation may be possible.
• Do not ask the child, young person or vulnerable adult to repeat what they have disclosed for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the child, young person or vulnerable adult that it will be a senior member of staff - the DSL.
• At the point of disclosure, try to see the matter through yourself and keep in contact with the child, young person or vulnerable adult. During day-to-day or short-term placements, ensure you reassure the child, young person or vulnerable adult that the DSL will keep in contact with them as it would not be possible for you to do so.

Record:

• Make some very brief notes at the time of disclosure and write them up as soon as possible.
• Do not destroy your original notes in case they are required at a later date.
• Record the date, time, place, persons present, any noticeable non-verbal behaviour and the words used by the child, young person or vulnerable adult. If they use pet words, abbreviations or colloquialisms, record the actual words used rather than translating them into proper words. Use the school/provision's concern tracking sheet or, where this is not possible, the agency's 'Record of Concern Form' (Appendix 1).
• Draw a diagram or complete our 'Safeguarding Body Map' document to indicate the position of any injuries.
• Record statements and observable things rather than your interpretations or assumptions.

Remember:
• Staff should be aware that students may not feel ready or know how to tell someone that they are being abused. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
• Follow the school/provision's Child Protection Policy and Procedures and share your concerns with their DSL.
• Refer to the Local Authority's social care services and/or the police if relevant.
• Support the child, young person or vulnerable adult - listen, comfort and be available.
• Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
• To try to get some support for yourself if you need it.

28. Recording and sharing information

Staff recognise the importance of sharing information with other agencies. Further information on sharing information can be found in the government's 'Working Together to Safeguard Children 2023' and 'Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers' documents. Staff also recognise that the Data Protection Act 2018 and General Data Protection Regulation (GDPR) do not prevent the sharing of information for the purposes of keeping children, young people and vulnerable adults safe. This includes allowing practitioners to share information without consent. We acknowledge that school and college staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the Local Authority children's social care. We will reflect these practices in our information sharing.

Recording is a tool of professional accountability and is central to safeguarding and protecting children, young people and vulnerable adults. We keep a central record of staff safeguarding and child protection training.

It is vital that concerns are recorded comprehensively and accurately, so that they can be monitored and emerging patterns noticed. All verbal conversations must be promptly recorded in writing.

All staff must be familiar with the DfE Data Protection guidance for schools, which helps school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

Reporting concerns

Concerns about children, young people or vulnerable adults should be recorded on the school/setting's concern tracking sheet or, where this is not possible, the agency's 'Record of Concern Form' (Appendix 1), which will detail the concerns about the child, young person or vulnerable adult and discussion with the DSL or deputy DSL. Please see the 'Record of Concern Form'.
All advice and agreed actions should be dated and signed and a record made of whom the concern has been shared with. Copies of the school/setting's concern tracking sheet or the 'Record of Concern Form' should be shared
immediately with the Senior DSL or DSL of the client school or alternative provision. In the circumstance that
contact with the Senior DSL or DSL of the setting cannot be made, the school/setting's concern tracking sheet or the 'Record of Concern Form' should then be shared with an agency's DSL without delay.

Some schools use electronic safeguarding systems, a well-known application being CPOMS. These systems allow for effective communication of safeguarding concerns to the relevant safeguarding staff. Supply staff, due to their shorter tenure, may not be given an individual log in or access to these safeguarding systems. Therefore, it is your responsibility as a member of supply staff to seek out how you may report safeguarding concerns promptly and effectively in each placement. Under no circumstances should a concern not be reported due to lack of access to a system.

For online tutors who do not have access to the corresponding school/setting's Senior DSL or DSL's contact details, or where contact cannot be made, they should then contact the agency's Senior DSL or DSL using the contact information which is listed in this policy, and is also available within the online tutoring platform, without delay.

For online tutors, our 'Record of Concern Form and 'Safeguarding Body Map' can be found within the online platform.

Supply staff are expected to find out where to locate the school/provision's reporting resources at the beginning of their placement.

Internal sharing of information will be limited to sharing information with staff where it will evidently benefit a child, young person or vulnerable adult and will generally be on a need-to-know basis. Information sharing and contact (or attempted contact) with other agencies should be logged.

It is expected that all staff are aware of the importance of sharing information and working with other professionals to get a full picture of need, so that the right help can be given to a child, young person or vulnerable adult. It is also expected that everyone who works with children, young people and vulnerable adults has a role to play in identifying concerns, sharing information and taking prompt action.

29. Referrals

If you have a concern that a child, young person or vulnerable adult is being abused or is at risk of being abused, it will be taken seriously. It is vitally important that you share the information with the school/setting's Designated Safeguarding Lead (DSL) immediately. Information regarding the specific setting's DSL should be issued to staff by the school/setting at the start of the booking.

Staff should record the information and include the date you received information or had concerns, the nature of the concern including any physical marks seen, or anything that the child, young person, vulnerable adult
or someone else has told you. You can use the school/provision's concern tracking sheet or, where this is not possible, the agency's 'Record of Concern Form' (Appendix 1). If you cannot find one of the school/provision's DSLs, please contact one of the agency DSL as soon as possible using the contact details listed in this policy.

Where online tutors have a safeguarding concern about a child, young person or vulnerable adult, they should raise the issue by informing the school/setting's DSL. If contact with the DSL or deputy DSL of the school/ setting cannot be made, then inform the agency's DSL. The agency's DSL contact information is listed in this policy and is also available within the online tutoring platform.

In all cases, the reporting of concerns in the contexts listed above should go directly to the school/provision's DSL. Where it is possible to make this contact in the first instance, please also copy in the agency DSL as listed in this document, so the agency has an overview of any issues raised.

Any child, young person or vulnerable adult in any family or any school could become a victim of abuse. Staff should always maintain an attitude of 'it could happen here'.

Anyone can make a referral if they are concerned a child, young person or vulnerable adult is in immediate danger. They must inform the DSL (as above) that a referral has been made as soon as possible.

Circumstances where any member of staff can make a referral to the local authority's social care team are as below:

- The situation is an emergency and the school/provision's DSL, their deputy DSL, the Headteacher and the Chair of Governors are all unavailable.
- They are convinced that a direct report is the only way to ensure a child, young person or vulnerable adult's safety.
- If, for any other reason, they make a judgement that a direct referral is in the best interests of the child, young person or vulnerable adult.

Please note that due to the nature of our supply business, staff are placed in numerous settings in different geographical areas. Due to this, there are several local authorities that we provide supply staff to. With this is mind, for an emergency referral, supply staff will need to seek out the relevant contact details for the local authority pertaining to their placement.

- In an emergency, take the action necessary to help the child, young person or vulnerable adult (for example call 999).
- Report your concern to the DSL immediately.
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss with colleagues, friends or family.
- Complete our 'Record of Concern Form' (Appendix 1).
- Seek support for yourself if you are distressed, finding it difficult to cope or would like to talk through any issues.

30. Safeguarding and child protection training for supply staff

In line with the Department for Education's Keeping Children Safe in Education guidance, the agencies require all supply staff to have read and understood Part 1 and Annex A of the Department for Education's Keeping Children Safe in Education guidance, and this is confirmed via a candidate declaration prior to clearing. Annual updates to the Keeping Children Safe in Education guidance are communicated to all active staff via email.

Candidates in the process of registering with the agencies are asked if they have completed safeguarding and child protection training within the last 12 months, and if so, a certificate must be supplied for their file. If they have not, at interview we provide them with access to complete a short online training course prior to clearance being awarded.

The agency will issue supply staff with a termly safeguarding and child protection briefing via email. Staff are expected to read these briefings to ensure they are familiar with topical issues, up to date policies, and that they have access to a free safeguarding and child protection course via our chosen provider, accessible via an app on their phone or by using a web browser.

Candidates who have been subject to incidents or allegations during a placement with our agencies may be required to complete further training if it is appropriate to consider them for future work.

31. The role of the Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is a senior member of staff who takes the lead responsibility for child

protection and has the status and authority within the agency to carry out the duties of the post including committing resources and where appropriate supporting and directing other staff.

Senior DSL: Amber Hawkeswood T 07522 436 986 E amber.hawkeswood@edwin.supply
DSL: Jessica Carrigan T 07501 465 612 E jessica.carrigan@edwin.supply
DSL: Joseph Cryan T 07522 993 514 E joseph.cryan@edwin.supply

The Senior DSL is supported by DSLs who are trained to the same standard as the Senior DSL. Ultimate lead responsibility for safeguarding and child protection remains with the Senior DSL, whose responsibility cannot be delegated.

The agency Senior DSL and DSLs will complete Advanced Safeguarding for DSLs training every two years. Additionally, they will complete the following online training at least every two years:

- Safer Recruitment Training,
- Safeguarding Children Level 3 and/or Advanced Designated Safeguarding Lead course,

- Online Safety Training
- Prevent Training

In addition to their formal training, their knowledge and skills are updated, e.g., via e-bulletins, meeting other DSLs and taking time to read and digest safeguarding developments at regular intervals, to keep up with any developments relevant to their role. Updates are provided via the Department for Education and external specialist safeguarding consultants.

In the context of a supply agency, it should be noted that the Senior DSL and DSLs do not have any direct contact with children, young people or vulnerable adults. The agency's DSLs will work in conjunction with client school/provision's DSLs as wholly as possible.

The broad areas of responsibility for the Senior DSL and DSLs are to work with external agencies and professionals on matters of safety and safeguarding.

Managing referrals

It is the responsibility of the DSLs to manage referrals from supply staff, or any others from outside the agency, including:

- Referring all cases of suspected abuse to social care services.
- Referring to the Local Authority Designated Officer (LADO) where there are allegations against staff.
- Disclosure and Barring Service (in cases where a person is dismissed or left due to risk/harm to a child, young person or vulnerable adult).
- Referring to the police (in cases where a crime may have been committed).
- Liaising with the Headteacher to inform him or her of issues, especially ongoing enquiries, under section 47 of the Children Act 1989 and police investigations.
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Training

The Senior DSL and DSLs should receive appropriate training every two years (at a minimum) in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference, a child protection review conference and be able to attend and contribute to these effectively when required.
- Ensure each member of staff has access to and understands the agency's Safeguarding and Child Protection Policy and Procedures.

In addition to all staff being required to attend safeguarding and child protection training, staff will also receive updates by email, staff meetings or e-bulletins, to keep their skills and knowledge up-to-date. This will take place at least annually.

32. Safer recruitment

Safe recruitment and selection practice is vital in safeguarding and protecting children, young people and vulnerable adults. We recognise and take seriously our responsibility to adopt practices which minimise risk by ensuring that measures are in place to deter, reject or identify people who might abuse children, young people or vulnerable adults, or who are unsuitable to work with them.

The safety and wellbeing of children, young people and vulnerable adults is considered at all times throughout the recruitment and selection process. We follow guidance that is contained in the Department for Education's 'Keeping Children Safe in Education 2025', along with our own Safer Recruitment Policy. This includes guidance on the disqualification declaration requirement for the staff to which it is applicable.

In accordance with this, we make sure that appropriate checks are carried out on new and existing staff, and bear in mind the safety of children, young people and vulnerable adults when advertising posts, calling for and scrutinising references and clarifying gaps in employment history, through to the interview process and carrying out enhanced Disclosure and Barring Service (DBS) and professional checks and verifications of qualifications and identity. Having consulted DfE and our auditing body, REC, we will not currently be performing online searches on candidates as part of our standard vetting process. However, where necessary, we will perform an online search where other concerns have been raised during the recruitment process. As part of our induction, all branch staff who are involved in the candidate recruitment process receive safer recruitment training.

All staff will be issued with:

- Our staff 'Code of Conduct', which includes acceptable use policy, staff/pupil relationships and communications, including the use of social media, and other related matters.
- Our Safeguarding and Child Protection Policy.
- Part 1 of the Department for Education's 'Keeping Children Safe in Education 2025' guidance.
- Guidance for Safer Working Practice
- Information regarding the role of the DSL.

In addition to obtaining a Disclosure and Barring Service certificate, anyone appointed to carry out teaching work has an additional check to ensure they are not prohibited from teaching. A person who is prohibited from teaching will not be appointed to our supply register.

For those engaged in management roles, an additional check will be carried out to ensure they are not prohibited under Section 128 provisions.

33. Confidentiality

All staff will understand that safeguarding and child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved, but also to ensure that information being released into the public domain does not compromise evidence.

All matters relating to safeguarding and child protection are strictly confidential. Child and adult protection information regarding children, young people and vulnerable adults will be shared with staff on a strictly need to know basis. A member of staff will need to know information when it can be evidenced to benefit the child, young person or vulnerable adult. All staff are expected to conform to our standards of good professional practice and maintain confidentiality appropriately at all times.
All staff must be aware of their responsibility to share information with the DSL and other agencies in order to protect and safeguard children, young people and vulnerable adults. However, following a number of cases
where senior leaders have failed to act upon concerns raised by staff, 'Keeping Children Safe in Education 2025'
emphasises that any member of staff can contact social care services if they are concerned about a child, young person or vulnerable adult.

Record of concern forms and other written information will be stored securely and password protected, and only made available to relevant individuals. Every effort will be made to prevent unauthorised access.

The Data Protection Act 2018 does not prevent school staff from sharing information with relevant agencies where that information may help to protect a child, young person or vulnerable adult.

No one in the school/provision may guarantee to a child, young person or vulnerable adult that they will keep a secret and must always make it clear, in language that is appropriate to the age and understanding of the child, young person or vulnerable adult, that any information which leads an adult to be concerned that a child, young person or vulnerable adult is suffering or is at risk of suffering harm will be shared with the school/setting's DSL in order to take measures to safeguard the child, young person, vulnerable adult or others at risk.

34. Supporting staff

We recognise that child and adult protection is a difficult and sometimes upsetting subject for those who work with children, young people or vulnerable adults. Working with a child, young person or vulnerable adult who has

suffered harm, or is at risk of harm, may be stressful and distressing. We are committed to supporting staff by encouraging them to talk through their experiences and anxieties with the school/setting's DSL or deputy DSL, and to seek further support from the agency or their GP as appropriate. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will be addressed sensitively and effectively in accordance with agreed whistleblowing procedures.

We believe that working within a school/setting that has clear child protection policies and procedures also helps to support staff in carrying out their duties and responsibilities effectively.

Where there are concerns about the way that safeguarding is carried out within a school/setting that a worker has been assigned to, then the school/setting's own Whistleblowing Policy should be referred to.

Where there are concerns relating to misconduct or wrongdoing by the agency, then refer to the agency's Whistleblowing Policy, which is available on the agency's website.

35. If you have concerns about a colleague

If staff have safeguarding concerns, or an allegation is made about another member of staff (including governors, supply teachers, agency staff and volunteers), posing a risk of harm to children, young people or vulnerable adults, then:

- This should be referred to the Headteacher.
- Where there are concerns or allegations about the Headteacher, this should be referred to the Chair of Governors, Chair of the Management Committee or Proprietor of an independent school.
- In the event of concerns or allegations about the Headteacher, where the Headteacher is also the sole Proprietor of an independent school, this should be reported directly to the LADO at the local authority.

36. Allegations against school staff and volunteers

Allegations which may meet the harm threshold

Staff are aware of the process to handle allegations against staff, including the Headteacher. Part 4 of the Department for Education's 'Keeping Children Safe in Education 2025' guidance sets out the process that must be followed.

School/setting Headteachers and Chair of Governors have a duty to report to the LADO (within 24 hours) if anyone working in a school, college or alternative provision that provides education for children under 18 years of age, including supply teachers and volunteers, has:

- behaved in a way that has harmed, or may have harmed, a child or young person
- committed, or possibly committed, a criminal offence against, or related to, a child or young person
- behaved towards a child/children or young person/young people in a way that indicates he or she may pose a risk of harm to children or young people, or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children or young people.

Allegations against staff should be reported to the Headteacher. It is the Head Teacher's responsibility to inform the supply agency where an allegation is made against a supply member of staff. Allegations against the Headteacher should be reported to the Chair of Governors. Staff may also report their concerns directly to the police or the local authority's social care team if they believe direct reporting is necessary to secure action.

Staff are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

The Headteacher/Chair of Governors will establish and share with the LADO:

- That an allegation has been made.
- The general nature of the allegation e.g., whether child or young person sustained injury/mark.
- When and where the alleged incident occurred.
- Who was involved and whether any other persons were present.
- What the view of the parents/carers is.
- Background information on the member of staff and the child/children or young person/young people.

The information will be shared with local authority's Children's Social Care team, who will liaise with the Police Child Abuse Investigation Team in relevant cases, and a decision will be made as to whether a strategy meeting will take place. The Headteacher or DSL, and in some cases the agency, will attend the strategy meeting.

Concerns which do not meet the harm threshold

Allegations/concerns that do not meet the harms threshold are referred to for the purposes of this policy document as 'low-level concerns'.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in the section above. A low-level concern is 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 of such behaviour could include, but are not limited to:

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

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

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly with the headteacher, and recorded and dealt with appropriately. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. Ensuring concerns are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

37. Multi-agency strategy meetings

This meeting will be chaired by the LADO or a senior member of the local authority's Children's Social Care team and will also be attended by a representative from Human Resources, a social worker and the Headteacher/Chair of Governors. The Police Child Abuse Investigation Team will be consulted and may attend if they consider a crime may have been committed.

The purpose of the meeting is to share information and the discussion will include the following:

- Whether the allegation triggers a S47 investigation by the police and/or Children's Social Care.
- What plans need to be made to safeguard the child or young person.
- Whether the child or young person is in need of services.
- Whether the school should conduct its own disciplinary investigation.
- What support can be offered to the member of school staff against whom the allegation is made.
- Whether a suspension is appropriate.
- Whether a referral needs to be made to the Disclosure and Barring Service that a person may be unsuitable to work with children and young people.

At the strategy meeting, a decision will be made as to whether the allegation is:

- **Substantiated –** Actions to be agreed on next course of action eg S47 investigation, police investigation and/or referral to the DBS. Any referral to the Crown Prosecution Service must be reviewed after 4 weeks. Referral to DBS must be made within one month of a subject leaving
- **Unsubstantiated** – Not enough evidence to support the allegation.
- **Malicious** – Referral to Children's Social Care as child or young person in need.
- **False** – There is sufficient evidence to disprove the allegation.

The subject of the allegation will usually be dealt with internally by the school through the school investigation process. The agency will be provided with an outcome of the investigation. If formal disciplinary action is required, it will be implemented by the agency. Only substantiated safeguarding allegations will be referred to in references.

38. Incidents and allegations made against a supply worker - procedures

The aim of this procedure is to set out the actions to be taken when these rules are breached and to ensure consistent and fair treatment for all.

This procedure is designed to establish the facts quickly and deal with safeguarding matters consistently. No action will be taken until the case has been fully investigated.

This procedure may be implemented at any stage if the supply worker's alleged misconduct warrants such action. This procedure applies to all supply workers regardless of length of service.

Whilst working for the company, should an incident or allegation be made against a supply worker, the following procedures will be followed:

• **If a school or alternative provision informs us of a particular incident, but they do not wish to take the matter further, an agency DSL will call you to arrange a meeting to discuss the incident or** allegation. The supply worker will not be offered any further work until after the meeting and will not be paid by the company during this time. During the meeting, the supply worker will have the opportunity to discuss the incident and put forward their version of events. After the meeting, a decision will be made regarding whether the supply worker can continue to work for the company. Where it is decided that further work will be offered, it is expected that additional training will be completed before recommencing work, including child protection, safeguarding and GDPR training and, if appropriate, a Team Teach course.

• **If a school or alternative provision informs us of a particular incident or allegation, and they are taking the matter further,** the school or alternative provision will inform the Local Authority Designated Officer (LADO) and the school will investigate the incident or allegation. If the incident or allegation reaches the LADO threshold, a position of trust (POT) meeting will be organised, where representatives from the company, the school or alternative provision and, in some instances, the police and social workers meet with the LADO
to discuss the incident or allegation. This process can be lengthy, and the supply worker will not be allowed to work with children, young people or vulnerable adults in any capacity during this time. The supply worker will not be paid by the company during this process. Our decision regarding whether to work with the supply worker again will be based on the outcome of this process. Outcomes will be one of the following:

1. **The allegation is malicious –** the supply worker will be able to continue to work in regulated activity and can continue working through our agencies.
2. **The allegation is unsubstantiated** – the supply worker will be able to continue to work in regulated activity and can continue working through our agencies.
3. **The allegation is unfounded** – the supply worker will be able to continue to work in regulated activity and can continue working through our agencies.
4. **The allegation is substantiated and the harm level has been reached** – the supply worker will not be able to continue being registered with Vision for Education, ABC Teachers and Smart Teachers.
5. **The allegation is substantiated but the harm level has not been reached –** then the supply worker will be invited to a safeguarding review meeting and a decision will be made as to whether the supply worker can continue working through our agencies.

Safeguarding review meeting

A safeguarding review meeting will be held by an agency DSL. As supply workers are not employees, they do not have the right to be accompanied. However, in the interest of general fairness we will allow a trade union representative or work colleague to accompany the supply worker if they feel that is necessary. If a supply worker intends to be accompanied, then advance notice must be given.

Depending on the seriousness of the incident or allegation, we may also make a report to statutory agencies such as the police, Disclosure Barring Service, Teaching Regulation Authority and the local authority's Child

Protection Service.

Throughout the process in handling allegations and at conclusion of a case, we will review the circumstances of the case and determine whether there are any improvements to be made to help prevent similar events in the future.

39. Abuse of trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.
In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent

40. Referrals to the Disclosure and Barring Service (DBS)

Under Sections 35-45 of the Safeguarding Vulnerable Groups Act 2006, employers have a legal duty to refer to the DBS when permission for an individual to engage in regulated activity is withdrawn, had the individual not resigned, retired, been made redundant or transferred out of regulated/controlled activity because they think the individual has:

- engaged in relevant conduct, and

- satisfied the harm test.

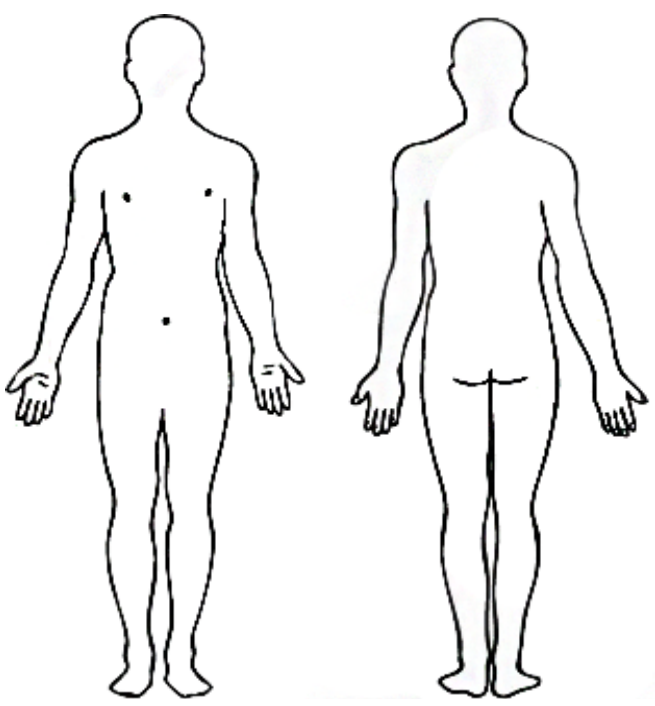
A referral should not wait until the end of the disciplinary process. A withdrawal does not necessarily mean permanent removal, it can include a temporary removal to another role, removing a volunteer from an approved list or suspension in some circumstances.

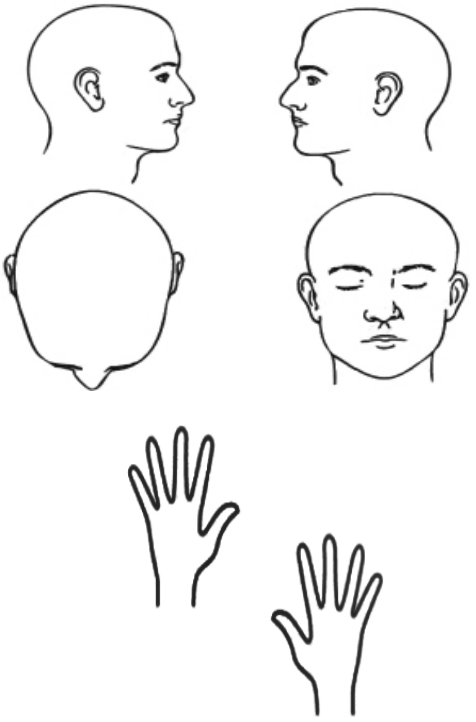
Guidance on how to make a referral to the DBS can be found here on the .Gov website.

APPENDIX 1

Safeguarding Body Map

Child, young person or vulnerable adult's name:	
Date of birth (if known):	
Name of member of staff who witnessed the injuries:	
Date and time injuries seen:	
Date and time info recorded:	
Details of injuries and location on body: *(Where they are, what they look like, their colour, shape, size and condition. Is the injury healing or worsening?)*	
How was the injury sustained according to the child young person, vulnerable adult and/or parent or carer?	





What action will be taken?

Date and time received by DSL:	
Name of DSL:	
Agency or school/alternative provision DSL:	☐ Agency ☐ School/alternative provision

Record of Concern Form

CHILD PROTECTION INCIDENT RECORDING SHEET

Name of member of staff recording incident:	
Current date and time:	
Name of pupil:	
Class:	
Date of birth:	
Who was present?	
Date and time reported to DSL:	
Names of any other staff informed:	
Names of any other pupils involved:	
Are parents/carers aware? *(Give details)*	☐ Yes ☐ No
Date and time of incident:	
Nature of concerns:	
Account of incident:	
Action taken:	
Name of duty worker/social worker if reported:	
Name of any other agencies involved:	
Further action:	

Signed:	
Date:	