Safeguarding and Child Protection Policy

Next Level Learning

Next Level Learning

Persons responsible for reviewing this policy	Kelly Lowe	**Director**
Approved by:	Proprietor, Managing Director and DSL	**Date:** September 2024
Last reviewed on:	September 2024 by Kelly Lowe	
Next review due by:	30th September 2025 by Kelly Lowe	

This policy has been developed to ensure that all adults with NLL are working together to safeguard and promote the welfare of children and young people.

SAFEGUARDING CHILDREN IS EVERYONE'S RESPONSIBILITY-in the event of a safeguarding incident the relevant agencies will be informed

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all children, young people and staff. It identifies actions that should be taken to redress any concerns about child welfare.

The Designated Safeguarding Lead for NLL who is Kelly Lowe or, in their absence, the authorised member of staff, who is Karen Talbot has the ultimate responsibility for safeguarding and promoting the welfare of children and young people. This policy is relevant to our other policies; Anti Bullying, E-Safety and Behaviour.

Contents

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL) Next Level Learning Ltd	Kelly Lowe	07590 99582 k.lowe@nextlevellearning.co.uk
Deputy DSL Next Level Learning Ltd	Karen Talbot	07985206537 Karen.talbot@nextlevellearning.co.uk
Local authority designated officer (LADO)		**Wigan 01942 486 042 /** **lado@wigan.gov.uk** **Salford 0161 603 4350 /** **LADO@salford.@salford.gov.uk** **Bolton 01204 337474 /** **boltonsafeguardingchildren@bolton.gov.uk** **Bury 0161 253 6168 /** **childwellbeing@bury.gov.uk** **Manchester 0161 234 1214 /** **qualityassurance@manchester.gov.uk** **Lancashire 01772 536694 /** **tim.booth@lancashire.gov.uk**
Channel helpline		020 7340 7264

Wigan – Safeguarding Childrens Board – 01942 828300

(for guidance visit https://www.wiganlscb.com)

Salford – Salford Safeguarding Children Partnership – 0161 603 4500

Out of Hours Emergency Duty Team – 0161 794 8888

(For guidance visit https://safeguardingchildren.salford.gov.uk)

Manchester – Manchester Safeguarding Partnership – 0161 234 3330

(For guidance visit https://www.manchestersafeguardingpartnership.co.uk)

Bolton – Bolton Safeguarding Children 01204 337479

(For guidance visit https://www.boltonsafeguardingchildren.org.uk)

Bury – Integrated Safeguarding Partnership 0161 253 6153

(For guidance visit https://burysafeguardingpartnership.bury.gov.uk)

Lancashire – Children's Safeguarding Assurance Partnership 0300 123 6720 /

0300 123 6722 (For guidance visit https://www.lancashiresafeguarding.org.uk

1. Aims

Next Level Learning aims to ensure that:

> Appropriate action is taken in a timely manner to safeguard and promote children's welfare

> All staff are aware of their statutory responsibilities with respect to safeguarding

> Staff are properly trained in recognising and reporting safeguarding issues

NLL aims to create and maintain a safe environment where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously. Our organisation implements policies, practices and procedures which promote safeguarding and the emotional and physical well-being of children, young people and staff. The Continuum of Needs and Response and the Common Assessment Framework is embedded into everyday practice and procedures when responding to children's need.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

> Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

> The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

> Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

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

> Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

> Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

> The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

> Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

> Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

> The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

3. Definitions

Safeguarding and promoting the welfare of children means:

> Protecting children from maltreatment

> Preventing impairment of children's mental and physical health or development

> Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

> Taking action to enable all children to have the best outcomes

All our staff and tutors update their Safeguarding training every year.

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

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams or computer-generated imagery.

Children includes everyone under the age of 18.

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

> The local authority (LA)

> A clinical commissioning group for an area within the LA

> The chief officer of police for a police area in the LA area

4. Equality & Diversity Statement

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

We give special consideration to children who:

> Have special educational needs (SEN) or disabilities or health conditions (see section 10)

> Are young carers

> May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

> Have English as an additional language

> Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

> Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

> Are asylum seekers

> Are at risk due to either their own or a family member's mental health needs

> Are looked after or previously looked after (see section 12)

> Are missing from education

> Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and tutors in the organisation and is consistent with the procedures of the 3 safeguarding partners. The policy is reviewed at least annually or when a significant change occurs by Kelly Lowe

5.1 All staff and tutors

All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff and tutors will be aware of:

> Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behavior policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, and the safeguarding response to children who go missing from education

> The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

> What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

> The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

> The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Kelly Lowe. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available for staff to discuss any safeguarding concerns. When the DSL is absent, the deputy DSL – will act as cover - all DSL team members will undergo appropriate and specific training to provide them with the knowledge and skills needed.

Safeguarding Team

Name	Designated Area	Contact No.
Kelly Lowe	Next Level Learning	07590 995823
Karen Talbot	Next Level Learning	07985 206537

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

> Provide advice and support to other staff on child welfare and child protection matters

> Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

> Contribute to the assessment of children

> Refer suspected cases, to the referring school/LEA and/or Police, and support staff who make such referrals directly

> Ensure procedures are in place to deal with allegations made against tutors or staff members

> Ensure all staff and tutors have access to safeguarding training and updates

> Ensure reporting of concerns systems are in place and stored/shared correctly

> Ensure safer recruitment practice is followed when recruiting new staff

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

5.3 The school or referring LEA

> To Ensure that all relevant information is shared at referral point so that NLL have a full understanding of the students' background and needs

> If a student is being taught from home, the school or LEA would need to have risk assessed the home to ensure it is safe and suitable for tuition to take place

> Ensure a point of contact is provided to NLL that is available when needed. A second point of contact would be beneficial also

> To ensure that when a safeguarding concern is passed on by NLL DSL, it is responded to that day

> To action upon the concern raised and keep NLL and other relevant parties informed every step of the way

> To invite the DSL from NLL to relevant meetings

5.4 The parent/responsible adult

> Ensure that they are fully aware of the NLL Safeguarding Policy

> Always be responsible for the welfare of the student during the session and maintain a presence at home or relevant venue, including sessions that take place online.

> Always be responsible for the physical environment of the student during the session ensuring it is safe and appropriate

> Ensuring that 'in person' sessions take place in an appropriate downstairs room, such as the family dining room (not the student's bedroom)

> Ensure that tutors are treated with respect and fairness by themselves and the learner and are not subjected to abusive behaviour or language

> Ensure that the student has no inappropriate/unsolicited communications with the tutor outside of the lesson

> Report any dispute with a tutor to NLL

> Report any inappropriate behaviour or illegal activity by a tutor to NLL

6. Confidentiality and Information Sharing

Staff and tutors ensure that confidentiality protocols are followed, and information is shared appropriately. The Proprietors or Designated Member of Staff discloses any information about a pupil to other members of staff on a need-to-know basis only.

All staff and tutors must understand that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff and tutors must be clear with children of their duty to report and action. Key principles include.

> Timely information sharing is essential to effective safeguarding

> Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

> The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

> If staff/tutors need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

> Staff/tutors should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

> The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

  see appendix 7

> If staff/tutors are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

> Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

All staff/tutors are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

> Is disabled

> Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)

> Is a young carer

> Is bereaved

> Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime

> Is frequently missing/goes missing from education, care or home

> Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

> Is at risk of being radicalised or exploited

> Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- 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 drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff and tutors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

https://www.gov.uk/report-child-abuse-to-local-council

See above summary contact table with telephone numbers and emails for each of our Local Authority areas.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL (See Appendix 6). Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

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

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

Any staff/tutor who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

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

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

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

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

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.5, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority or referring school. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Early help

NLL will support the referring school/LEA with updates that will help towards Early Help. The responsibility for this would fall upon the referring school/LEA.

Referral

Staff/tutor has concerns about the welfare of a child or young person.

Staff/tutor discusses with NLL DSL and a safeguarding concern sheet is completed ASAP and emailed across to DSL

NLL DSL to forward the concern sheet onto the contact at the referring school/LEA and log onto the NLL Safeguarding spreadsheet

Referring school/LEA DSL will decide if any further action needs to be taken or not. If not the situation will be monitored by the referring school/LEA

If further action needs to be taken, the referring schools/LEA's DSL checks whether child/young person already subject to CP plan by calling the Safeguarding and Improvement unit

If no current CFSC involvement, the referring school/LEA DSL will refer to CFSC via the contact centre and in writing within 24 hours

The referring school/LEA's DSL will notify NLL where appropriate of actions taken and outcomes

CFSC will acknowledge receipt within 2 working days

Referring school/LEA DSL will liaise with CFSC and attend meetings, where appropriate, and update all organisations involved, where relevant

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority or referring school. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will contact their point of contact at school/LEA to help decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism', or the local authority children's social care team. The referring LEA or school have the responsibility to decide what agency the referral will be made too and for completing that referral.

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

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

> Think someone is in immediate danger
> Think someone may be planning to travel to join an extremist group
> See or hear something that may be terrorist-related

7.6 If you have a mental health concern

We have an important role play to support the mental health and wellbeing of our students. Negative experiences and distressing life events can affect the mental health of children and their parents. This can include for example being fearful or withdrawn; aggressive or oppositional; or excessive clinginess.

Our staff and tutors know how to deal with a concern regarding a child or member of staff's mental health concerns. With the access we have to external agencies we are able to signpost these concerns to ensure they are dealt with by a trained professional.

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

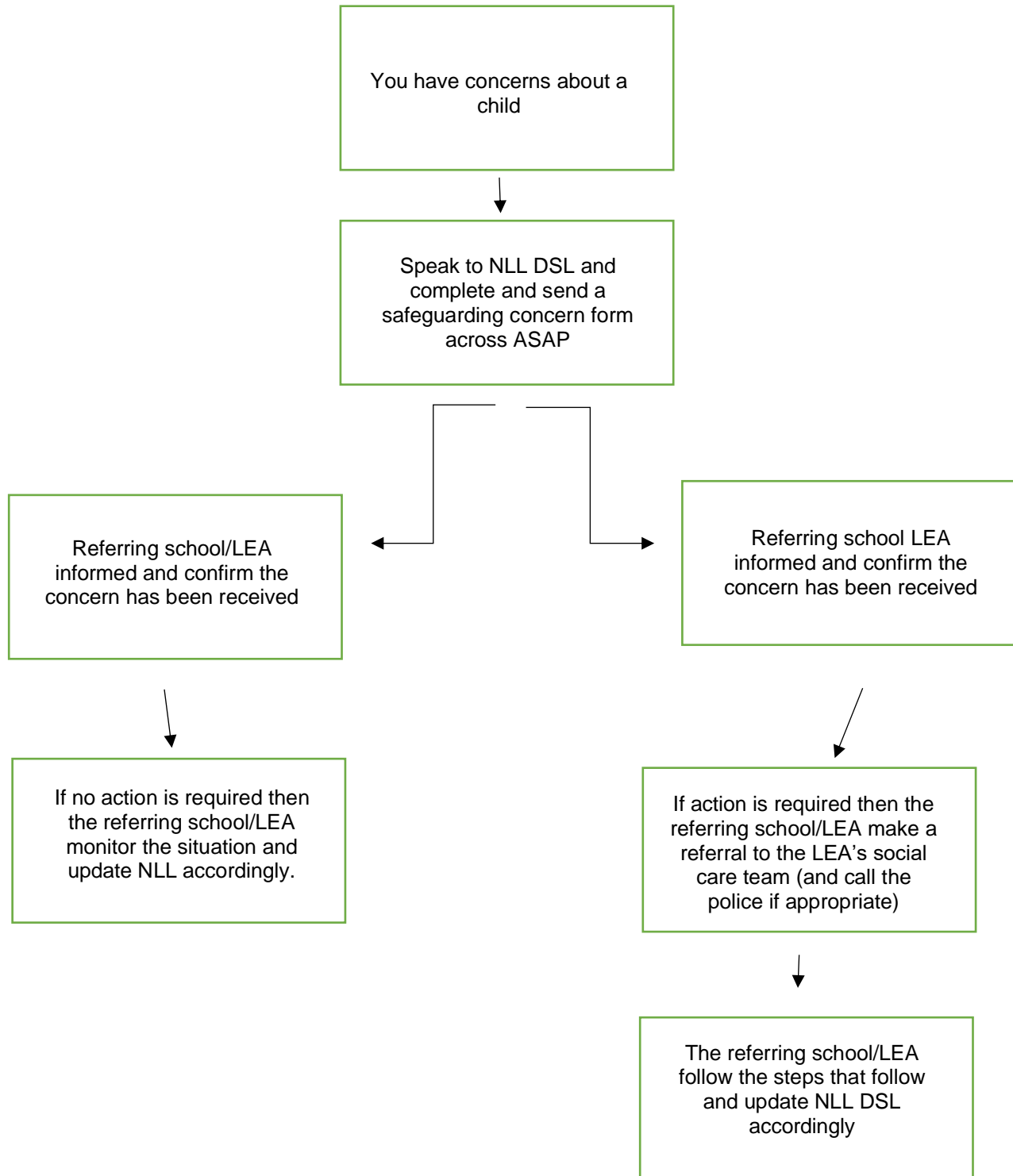*Staff/tutors will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.*

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

*If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.*

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

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                    ┌──────────────────────────┐
                    │  You have concerns about │
                    │         a child          │
                    └────────────┬─────────────┘
                                 │
                                 ▼
                    ┌──────────────────────────┐
                    │   Speak to NLL DSL and    │
                    │  complete and send a      │
                    │ safeguarding concern form │
                    │       across ASAP         │
                    └────────────┬─────────────┘
                                 │
              ┌──────────────────┴──────────────────┐
              ▼                                      ▼
┌──────────────────────────┐        ┌──────────────────────────┐
│  Referring school/LEA     │        │  Referring school LEA     │
│  informed and confirm the │        │  informed and confirm the │
│  concern has been received│        │  concern has been received│
└────────────┬─────────────┘        └────────────┬─────────────┘
             │                                    │
             ▼                                    ▼
┌──────────────────────────┐        ┌──────────────────────────┐
│ If no action is required  │        │ If action is required then│
│ then the referring        │        │ the referring school/LEA  │
│ school/LEA monitor the    │        │ make a referral to the    │
│ situation and update NLL  │        │ LEA's social care team    │
│ accordingly.              │        │ (and call the police if   │
│                           │        │ appropriate)              │
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                                                  │
                                                  ▼
                                     ┌──────────────────────────┐
                                     │ The referring school/LEA  │
                                     │ follow the steps that     │
                                     │ follow and update NLL DSL │
                                     │ accordingly               │
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7.7 Concerns about a staff member or tutor

If you have concerns about a member of staff/tutor or an allegation is made about a member of staff/tutor posing a risk of harm to children, speak to the proprietor as soon as possible. If the concerns/allegations are about the proprietor, speak to another senior member of the team.

The proprietor will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the Proprietor, speak to another senior member of the team and the local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff/tutor to a senior member of the team or the proprietor, report it directly to the local authority designated officer (LADO).

7.8 Allegations of abuse made against other pupils

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

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

Most cases of pupils hurting other pupils will be dealt with under our NLL's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

> Is serious, and potentially a criminal offence

> Could put pupils at risk

> Is violent

> Involves pupils being forced to use drugs or alcohol

> Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about peer-on-peer abuse.

Procedures for dealing with allegations of peer-on-peer abuse

If a pupil makes an allegation of abuse against another pupil:

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

> The DSL will contact the local authority/referring schools DSL and follow their advice, as well as the police if the allegation involves a potential criminal offence

> The DSL will work with the school/LEA to follow a risk assessment and support plan that they put in place for the children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

> The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Peer on Peer Support

Creating a supportive environment and minimising the risk of peer-on-peer abuse

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

To achieve this, we will:

> Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

> Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

> Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

> Ensure staff/tutors reassure victims that they are being taken seriously

> Ensure staff/tutors are trained to understand:

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

  o That even if there are no reports of peer-on-peer abuse, it does not mean it is not happening – staff/tutors should maintain an attitude of "it could happen here"

  o That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

    ▪ Children can show signs or act in ways they hope adults will notice and react to

    ▪ A friend may make a report

    ▪ A member of staff may overhear a conversation

    ▪ A child's behaviour might indicate that something is wrong

  o That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

  o That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

  o The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it

  o That they should speak to the DSL if they have any concerns

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

> View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

> Delete the imagery or ask the pupil to delete it

> Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

> Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

> Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL. DSL will report immediately to the referring school/LEA and help with processes of reporting.

Initial review meeting

The ultimate responsibility for initial reviews falls upon the referring school/LEA. NLL, when invited, will attend review meetings and record appropriately on our data base systems.

Curriculum coverage

This is not part of NLL's offer, but we will support schools and when asked can hold discussions and short pieces of work with the pupil around PSHE issues

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

> Put systems in place for pupils to confidently report abuse

> Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.

> Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

> Students can speak with their tutor or a staff member in the office and are aware of recording procedures and supportive escalation pathways. This information is sent in the initial welcome pack at the start of their tuition placement.

> Students will be kept informed of any actions and support via NLL DSL.

8. Online safety and the use of mobile technology

See Staff Handbook regarding staff use.

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

To address this, NLL aims to:

> Have robust processes in place to ensure the online safety of pupils, staff and tutors

> Protect and educate pupil's in the safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

> Set clear guidelines for the use of mobile phones for pupils.

> Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

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

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

> **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

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

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

> Train staff/tutors, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

> . We will also share clear procedures parents/carers with them, so they know how to raise concerns about online safety

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

   o Staff/tutors are allowed to bring their personal phones to lessons for their own use, but will limit such use to non-contact time when pupils are not present

   o Staff/tutors will not take pictures or recordings of pupils on their personal phones or cameras

> Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our organisation's community

This section summarises our approach to online safety, but this does ultimately remain the responsibility of the referring school/LEA.

9. Notifying parents or carers

Once NLL have shared a concern with the referring school/LEA, it is their responsibility to discuss the concerns with the responsible adult/parent/carer if appropriate and advised.

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

> Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

> Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

> The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

> Communication barriers and difficulties in managing or reporting these challenges

NLL will work closely with school SENDco to ensure our tutoring offer is according to their plans and discussed at each stage for further improvements/developments.

11. Pupils with a social worker

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

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

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

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

> The provision of academic support

12. Looked-after and previously looked-after children

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

> Appropriate admin staff have relevant information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

> The DSL and Deputy DSL have details of children's social workers and relevant virtual school heads

As part of their role, they will:

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

> Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Pupils who are lesbian, gay, bisexual or gender questioning

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Add details of the pastoral support you offer these pupils, such as appointing an LGBTQ+ pastoral lead.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

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

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff/tutors

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

14.2 Other complaints

Any concern or expression of disquiet made by a child or young person will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.

We will make sure that the child or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also where possible about the length of time required to resolve the complaint. We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

14.3 Whistleblowing

We will follow the whistle blowing protocol as agreed by the proprietor.

Please see the Staff Handbook which includes information on The NHS and Social Care Whistleblowing Helpline on 08000 724725 or email to enquiries@wbhelpline.org.uk . The Whistleblowing policy applies to all staff and volunteers and is due for review by 1st September 2025.

15. Record-keeping

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

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

> A clear and comprehensive summary of the concern

> Details of how the concern was followed up and resolved

> A note of any action taken, decisions reached and the outcome

> Relevant sharing with pupils' school/LEA Safeguarding leads.

Concerns and referrals will be kept in a separate child protection file for each child.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

> We have secure cloud storage for general files, and this is backed up.

> We follow all data principles and have a data protection officer from an educational law firm who manages our audits, storage and review.

> We will follow all statutory guidance for file storage and retention.

> We have levels of access and sharing in place for appropriate staff.

Information will only be shared via formal request, referral or GDPR routes and all sharing is pre checked with HY Education.

In addition:

> Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

> Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Recording of safeguarding concerns remain the referring school and LEA's responsibility.

16. Training

16.1 All staff

All staff/tutors will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

> Be integrated, aligned and considered as part of our organisation safeguarding approach and wider staff/tutor training

> Be in line with advice from the 3 safeguarding partners

> Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

> Have regard to the Teachers' Standards to support the expectation that all teachers:

o Manage behaviour effectively to ensure a good and safe environment

o Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

16.2 The DSL and [managers/deputies]

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

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

They will also undertake Prevent awareness training.

16.3 Recruitment – interview panels

At least one person conducting any interview for any post with NLL will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.4 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff behaviour/code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- First aid
- Privacy notices
- Whistleblowing