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CHILD PROTECTION POLICY AND PROCEDURES 2024-2025

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Section 1: Introduction

We are committed to safeguarding children and young people, and we expect everyone who works in EmpowerEd to share this commitment. All adults in our company take all welfare concerns seriously and encourage children and young people to talk to us about anything that is worrying them.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, always, what is in the **best interests** of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action. A contextual safeguarding approach (for risks outside of the home) must also be considered when looking at individual cases. All assessments should include this wider picture.

All staff must have read and understood:

- Part 1 of Keeping Children Safe in Education (September 2024)
- EmpowerEd Code of Conduct
- Behaviour Policy
- EmpowerEd policies and procedures

All staff must also be aware of:

- The child protection policy
- Online Safety
- The behaviour policy.
- The staff code of conduct
- The safeguarding response to children who are absent from sessions, on repeat occasions and/or prolonged periods or where the absence is persistent or unexplainable.
- The role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any managers/deputy designated safeguarding leads).



Managers and staff that work directly with children must have also read – Annex A and Annex B of Keeping Children Safe in Education (September 2024).

All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

"THE WELFARE OF THE CHILD IS PARAMOUNT"

The safety and welfare of our students is of the utmost importance, ensuring that they are protected from maltreatment, impairment of their mental and physical health or development and that they are growing up in circumstances consistent with the provision of safe and effective care. We take action to enable all children to have the best outcomes. We have created a culture of vigilance where pupils and students' welfare is actively promoted. Pupils and students are listened to and feel safe. We maintain an 'it could happen here' attitude.

We know children learn best when they are healthy, safe, and secure, when their individual needs are met and when they have positive relationships with the people caring for them. We aim to have a community which is welcoming, safe, and stimulating and where children can enjoy learning and grow in confidence. All necessary steps are taken to keep children safe and well.

Because of the day-to-day contact with children, our staff are trained to identify when a pupil may be at risk of harm and abuse, and they report their concerns immediately. We have a duty to safeguard and promote the welfare of our pupils and students under the Education Act 2002 and Children Act 1989/2004 through identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate.

Staff are trained to answer questions about how students can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

Section 2: Purpose and Aims

The elements in this policy and our procedures related to this aim to:



- Ensure safe recruitment practice in checking the suitability of all our staff and volunteers to work with children including the completion of risk assessments.
- Ensure staff are appropriately trained.
- Raise awareness of safeguarding/child protection issues amongst all staff, supply, agency, and volunteers and of what to do if they have concerns.
- Ensure all staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- Below are some safeguarding issues all staff should be aware of: Child-On-Child Abuse; Child Criminal Exploitation (CCE); Child Sexual Exploitation (CCE); Domestic Abuse; Female Genital Mutilation (FGM); Mental Health and Serious Violence (KCSIE, September 2024). Annex B in KCSIE contains important additional information about specific forms of abuse, exploitation, and safeguarding issues. School and college leaders and those staff who work directly with children should read Annex B.
- Ensure that volunteers are appropriately supervised.
- Ensure that our procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that our links with relevant agencies are effective and that we co-operate and work in a partnership regarding child protection matters, including attendance at case conferences and core group meetings where appropriate.
- Ensure that our tuition centre environment is safe and is one in which children feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure that children know there are adults in the tuition centre who they can approach if they are worried about anything.
- Ensuring that students have a safe space to speak to a trusted adult, where they can raise concerns.
- Ensure that we support pupils and students who have been abused or may be at risk of harm in accordance with any agreed child protection plan.
- Ensure that we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure that staff follow accepted “safe practice” principles when working with pupils and students.
- Ensure that pupils and students are protected from all forms of harm.
- Ensuring that EmpowerEd creates an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

If there are Child Protection concerns, the **London Child Protection Procedures** (*London Safeguarding Children Board, 7th edition, 2022 – last updated April 2024*) must be followed. This can be found at www.londoncp.co.uk. The Local Safeguarding Children Partnership (LSCP) has adopted these procedures.

In addition to our overarching Safeguarding and Child Protection Policy and Procedures, the following policies should also be considered:

Induction, SEN, Pupil Premium, Equality, Health and Safety, Safer Recruitment, Attendance, Behaviour, Anti-bullying, E-Safety (including Filtering and Monitoring/mobile phone use), Positive handling, Intimate Care, Drug and Alcohol, Medical, Healthy Relationships, Data Protection, Whistleblowing.

Section 3: Links to other guidance

Although this list is not exhaustive, this policy and procedure also accords with:

- [After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers)
- [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/keeping-children-safe-in-education-2024)
- [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/working-together-to-safeguard-children)
- [Early years foundation stage \(EYFS\) statutory framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/early-years-foundation-stage-eyfs-statutory-framework)
- [Children Missing Education - Guidance for Local authorities \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/children-missing-education-guidance-for-local-authorities)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation)
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-guidance-england-and-wales-2023)
- [Prevent-Duty-Guidance-Schools-and-early-years-providers-briefing-note-1.pdf](https://www.gov.uk/government/publications/prevent-duty-guidance-schools-and-early-years-providers-briefing-note-1)
- [Disqualification under the Childcare Act 2006 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/disqualification-under-the-childcare-act-2006)
- [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/information-sharing-advice-for-safeguarding-practitioners)
- [What to do if you think a child is being abused \(DfE March 2015\)](https://www.gov.uk/government/publications/what-to-do-if-you-think-a-child-is-being-abused)
- [Section 5B of the Female Genital Mutilation Act \(2003\) Section 74 of the Serious Crime Act 2015](https://www.gov.uk/government/legislation/section-5b-of-the-female-genital-mutilation-act-2003)
- [Female Genital Mutilation: Resource Pack \(Updated February 2023\)](https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack)
- [Regulated activity in relation to children \(2012\)](https://www.gov.uk/government/publications/regulated-activity-in-relation-to-children)
- [Teacher Status Checks \(Updated June 2024\)](https://www.gov.uk/government/publications/teacher-status-checks)
- [Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/child-sexual-exploitation-definition-and-guide-for-practitioners)
- [Understanding sexualised behaviour in children | NSPCC Learning](https://www.nspcc.org.uk/learning/understanding-sexualised-behaviour-in-children/)
- [Searching, Screening and Confiscation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/searching-screening-and-confiscation)
- [Promoting the education of looked-after children and previously looked-after children \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/promoting-the-education-of-looked-after-children-and-previously-looked-after-children)
- [Criminal exploitation of children and vulnerable adults: county lines \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/criminal-exploitation-of-children-and-vulnerable-adults-county-lines)
- [Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/data-protection-the-data-protection-act)
- [Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/mental-health-and-behaviour-in-schools)
- [young-people-who-self-harm-a-guide-for-school-staff.pdf \(rcpsych.ac.uk\)](https://www.rcpsych.ac.uk/young-people-who-self-harm-a-guide-for-school-staff.pdf)
- [Education for a Connected World \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/education-for-a-connected-world)
- [Reducing the need for restraint and restrictive intervention - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/reducing-the-need-for-restraint-and-restrictive-intervention)
- [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/relationships-and-sex-education-rse-and-health-education)
- [Positive environments where children can flourish - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/positive-environments-where-children-can-flourish)



- [Safeguarding and remote education - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Implementation of the Marriage and Civil Partnership \(Minimum Age\) Act 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Gender Questioning Children - non-statutory guidance \(education.gov.uk\)](https://education.gov.uk)

Section 4: Safer Recruitment

The safe recruitment of staff EmpowerEd is the first step to safeguarding and promoting the welfare of the children in education.

In our recruitment and selection of staff and volunteers we will always adhere to the government guidance contained within “*Working Together to Safeguard Children*” (July 2018 – Updated July 2022 – currently under consultation) and ‘*Keeping Children Safe in Education* (DfE 2023).

We will ensure that:

- For good practice, our interview panel includes at least one member who has completed safer recruitment training,
- that we always follow up gaps in previous employment,
- that we always require references from previous employers
- that for all posts, paid and voluntary, the appropriate Disclosure and Barring Service (DBS) information has been received.
- We consider carrying out online checks for shortlisted candidates and have updated our Safer Recruitment Policy to reflect this. This may help identify any incidents or issues that have happened, and are publicly available online, which EmpowerEd might want to explore with the applicant at interview.

Section 5: Contractors and Outside Agencies

We expect all contractors providing services within EmpowerEd whose staff have access to EmpowerEd premises to comply with this policy and the attached procedure, as well as the staff code of conduct. The contractor or individual must agree to this in writing.

We require any contractor or organisation delivering a service to provide evidence they adhere to the above requirements in terms of recruitment, selection, training and supervision of their staff and any volunteers, in particular DBS information.



Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required (not including barred list information).

Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

If a contractor working with EmpowerEd is self-employed, the school will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

The identity of contractors and their staff will be checked on arrival at the school.

This policy and procedure will also apply to any organisation using EmpowerEd tuition centres. They must agree to this in writing.

For more information on regulated activity:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

Section 6: Site Security

All people on the site must adhere to the guidelines within this policy. Laxity can cause potential safeguarding issues to arise. Therefore:

- Entry gates to the centre should be locked
- All Exit Doors should be closed to prevent intrusion.
- The school will not request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). Centre managers will use his/her professional judgement about the need to escort or supervise visitors.
- For visitors who are attending in a professional capacity, their ID will be checked, and assurance will be sought that the visitor has had the appropriate DBS check (or that the visitor's employers have confirmed that their staff have appropriate checks).
- Children will only be allowed home with adults with parental responsibility or confirmed permission. Upon leaving the centre, all children will be signed out.
- Should a child leave a tuition session without permission this will be reported immediately.



- All visitors are required to sign in at the reception desk where they will be given a visitor's badge. This will be returned on departure.

Section 7: Data Protection – Information and Records

The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

All staff must maintain records and obtain and share information (with parents, carers, other professionals working with the child, police, social services, and Ofsted as appropriate) to ensure safe and efficient management of the company, and to help ensure the needs of all children are met. All staff must enable a regular two-way flow of information between parents and EmpowerEd.

Confidential information and records about children are held securely and only accessible and available to those who have a right or professional need to see them. EmpowerEd is aware of responsibilities under the latest Data Protection Act in England, including those imposed under the General Data Protection Regulation (GDPR) passed by the European Union. We believe that protecting the data we hold about our children is a fundamental part of our safeguarding process and treats this information with as much importance as protecting the child themselves.

All staff understand the need to protect the privacy of the children in their care as well as the legal requirements that exist to ensure that information relating to the child is handled in a way to ensure confidentiality. Parents and carers are given access to all records about their child provided that no relevant exemptions (information which could cause harm to the child or any other individual) apply to their disclosure under the DPA.

The GDPR imposes more stringent requirements on entities that deal with people's personal data. This applies to all personally identifiable information held on staff, children, and parents. We are fully committed to ensuring that it upholds the new rights granted to a person under the GDPR. Parents and carers should be aware that there are legal requirements that supersede data protection regulations. EmpowerEd is required to share data with certain agencies under legal obligations.

For more information:

[Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Section 8: Definition of Safeguarding and Child Protection

Safeguarding: is about every child



In relation to children and young people, safeguarding and promoting their welfare is defined in *Keeping Children Safe in Education (September 2024, Page 7)* 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.

In relation to children and young people, safeguarding and promoting their welfare is defined in *Working Together to Safeguard Children (December 2023, Page 7/8)* 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 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.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.

Child Protection: Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online (*Working Together to Safeguard Children (December 2023)*).

Section 9: The four main forms of abuse

All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff should be aware of the indicators of abuse, neglect, and exploitation (see below), understanding that children can be at risk of harm inside and outside of tuition sessions, as well as school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and



neglect so that staff are able to identify cases of children who may be in need of help or protection.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In ***Working Together to Safeguard Children (December 2023, Page 160)***, the definition of Neglect is as follows:

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); ensure access to appropriate medical care or treatment; **provide suitable education**. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For more information and to access Sutton's Neglect Toolkit, please click the link below:

[Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice \(suttonlscp.org.uk\)](https://suttonlscp.org.uk)

Section 10: Specific Safeguarding Issues

Safeguarding action may be needed to protect children and learners from specific safeguarding issues such as:

- Child abduction and community safety incidents;
- Child Criminal Exploitation (CCE);
- Child Sexual Exploitation (CSE);
- County lines;
- Children and the court system;
- Children who are absent from education;
- Children with family members in prison;
- Cybercrime;
- Domestic abuse;
- Homelessness;
- Mental health;
- Modern Slavery and the National Referral Mechanism;
- Preventing radicalisation;
- The Prevent duty;
- Channel;



- Sexual violence and sexual harassment between children in schools and colleges;
- Serious Violence;
- So-called 'honour'-based abuse (including FGM and Forced Marriage)
- FGM;
- FGM mandatory reporting duty for teachers
- Forced marriage

Please note this is not an exhaustive list – but are an indicator of some of the key issues of which staff may become aware.

See: Appendix A for further safeguarding definitions
[Annex B: Further information \(keepingchildrensafeineducation.co.uk\)](https://www.keepingchildrensafeineducation.co.uk)

Section 11: Early Help

Every family can go through difficult or challenging times at some point during their lives. If you are aware of a family that is experiencing problems, they may require support to help them to deal with difficult situations and make things better. Early Help services and support should be offered as soon as a problem or difficulty starts. This is to stop things from getting worse, and to make sure that the family gets the help that they need. The Early Help Assessment Tool (EHAT) is used to find out about the family so that we can understand the difficulties that they may be experiencing. The EHAT is used when a family would like support to help them with a difficulty; when a professional working with a family recognises that they may require extra support; when a family have lots of professionals working with them and services and information needs to be organised to help make things clearer for them, where the needs of the family are unknown or unmet. The EHAT is entirely consent based and the family can decide at any point that they no longer wish to engage with the process. An EHAT is confidential except where there is a risk of serious harm to a child or young person.

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 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. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

Any child may benefit from early help, but all 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 drugs or alcohol themselves.
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child.

For more information, please visit:

[Sutton Local Safeguarding Children Partnership - Helping Early in Sutton \(suttonlscp.org.uk\)](http://suttonlscp.org.uk)

[Targeted Early Help service - Sutton Council](#)

[Home | Sutton Information Hub](#)

[Commonly asked questions – Cognus](#)

[Eligibility Criteria for Targeted Early Help Support in Sutton.docx](#)

Signposting for families in times of need is vital, especially with the impact of the cost-of-living crisis. For further support please visit: [Together for Sutton - Together for Sutton](#)

Section 12: Mental Health

We aim to promote positive mental health and wellbeing for our whole EmpowerEd community; pupils and students, staff, parents, and carers, and recognise how important mental health and emotional wellbeing is. We recognise that children's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement.



Through a whole-company approach, we actively seek to promote emotional health and wellbeing by helping pupils and students to understand their feelings and the feelings of others.

Our role in tuition sessions at EmpowerEd is to help our pupils and students to succeed and reach their potential by supporting them to be resilient and mentally healthy. We also have a role to ensure that pupils and students learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues and where they can go if they need help and support.

All staff should also be aware that 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. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect, exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.

EmpowerEd has an important role to play in supporting the mental health and wellbeing of their pupils and students.

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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

EmpowerEd can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If you have a concern regarding the Mental Health of a child, contact your Designated Safeguarding Lead immediately to enable the required support to be put in place as soon as possible.

See: Appendix B for further definitions

Section 13: Children Missing in Education, CME, and Elective Home Education (EHE)



Children being absent from education or planned tuition sessions 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 EmpowerEd's response to persistently absent pupils and children missing tuition sessions 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 (KCSIE, September 2024).

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils and students are not at scheduled sessions. This means we need to have at least two up to date contact details for parents/carers. Parents should remember to update the EmpowerEd as soon as possible if the numbers change.

Please note this is different to children who leave tuition sessions without permission. If this happens, call the police, and follow the child where possible. Do not chase.

A child missing tuition sessions could be indicative of a child also missing their education at school. For advice, please contact attendance@cognus.org.uk.

'Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation, or radicalisation, and becoming NEET (not in education, employment, or training) later in life' (Children Missing Education, August 2024).

For further guidance:

[Sutton Local Safeguarding Children Partnership - LSCP Protocols \(suttonlscp.org.uk\)](https://suttonlscp.org.uk)
[Children Missing Education - Guidance for Local authorities \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
[Bitesize Safeguarding Training Videos and Accompanying Slides – Cognus](#)

In response to the guidance in Keeping Children Safe in Education (September 2024) EmpowerEd has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils and students who go missing from scheduled tuition sessions (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones as well as an awareness of breast-ironing and honour-based abuse (including FGM and forced marriage).



We will ensure that pupils and students who are expected to attend tuition sessions but fail to attend will be referred to the local authority where appropriate.

Section 14: Attendance

Please see our Attendance Policy.

Section 15: Children Looked After (CLA)

The designated lead staff are responsible for Children Looked After. All children looked after have a Personal Education Plan (PEP), which is part of the child's care plan and will be supported during tuition sessions wherever possible. This is reviewed termly. Advice and support are available through the virtual school and virtual head teacher.

[Sutton Virtual School – Cognus](#)

Section 16: Previously Children Looked After (Post-CLA)

The designated lead staff are also responsible for Previously Children Looked-After.

A previously child looked-after is one who is no longer looked after in England and Wales because s/he is the subject of an adoption, special guardianship or child arrangements order which includes arrangements relating to with whom the child is to live, or when the child is to live with any person, or has been adopted from 'state care' outside England and Wales; and a child is in 'state care' outside England and Wales if s/he is in the care of or accommodated by a public authority, a religious organisation or any other organisation the sole or main purpose of which is to benefit society.

Post-CLA support arrangements are distinct to those for CLA and are responsive to the needs of the child and family using the appropriate support systems.

Section 17: Internet Filtering and Monitoring

Our Internet provider is: BOnline

Internet access is filtered in two groups:



- **Staff**
- **Students**

All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, **includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring** at induction. The training is regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Section 18: Online Safety

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist 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.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse (KCSIE, 2024).

When children use the EmpowerEd's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils and students are able to access the internet using their own data plan. To minimise inappropriate use, as a tuition centre we ensure any student using a laptop to complete work is supervised 1:1 by a member of staff. Students are supervised and guided carefully when engaged in learning activities involving online technology. Students and parents/carers are informed of our policy regarding phones and digital devices, which are not allowed to be used during sessions.

If a student opts to bring a digital device or mobile phone to a session, upon entry to a session, students hand in mobile phones to be securely locked in a drawer, these are collected at the end of their tuition session upon signing out.

Through training all staff members will be made aware of the following:

- Pupil attitudes and behaviours which may indicate that they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Section 19: Mobile Phone and Camera Safety

1. Prohibition of Mobile Phones and Digital Devices During Sessions

- Students, parents, and carers will be informed that mobile phones, cameras, tablets, and other digital devices are strictly prohibited from being used during tuition sessions.
- This information will be communicated during enrollment, introduction sessions, through signage within the tuition centre, and in communications sent to parents and carers.

2. Secure Storage of Devices

- Students who bring mobile phones or digital devices to the tuition centre must hand them in upon entry to the session.
- Devices will be securely stored in a locked area managed by the centre's staff. Each device will be labelled with the student's name for proper identification.
- At the end of the session, devices will be returned to students once they have signed out of the session.

3. Signing Out Process

- At the conclusion of each session, students will sign out under staff supervision. Devices will only be returned once the student's attendance and departure are officially recorded.
- If a student fails to sign out, the device will not be returned until the sign-out process is completed, ensuring accountability.

4. Parental Responsibility

- Parents and carers are encouraged to remind students of the importance of complying with this policy.
- In case of emergency, parents may contact the tuition centre directly. Staff will facilitate communication between students and parents if necessary.

Safeguarding Considerations

The use of mobile phones and digital devices during sessions poses several risks, particularly in educational settings that involve children. This policy directly aligns with *Keeping Children Safe in Education 2024* and is designed to mitigate the following risks:

1. Inappropriate Use of Devices

- Mobile phones and digital devices may be used to access inappropriate content, record other students without consent, or engage in cyberbullying, which can jeopardise the safety and well-being of students.



- By prohibiting their use and securely storing them, we significantly reduce the potential for misuse and protect the privacy of all students.

2. Distraction-Free Environment

- Mobile phones can disrupt the learning process by diverting students' attention away from the lesson. This policy ensures that students remain focused on their education, promoting better academic outcomes and a safe learning space.

3. Safeguarding Personal Data and Privacy

- Digital devices often contain cameras or other recording capabilities. These can be misused to record sensitive information, breach privacy, or expose children to inappropriate content.
- By locking devices away during sessions, we limit opportunities for these breaches, ensuring that no unauthorised recording or sharing of images/videos occurs.

4. Staff and Student Accountability

- The signing-out process adds an extra layer of accountability. It helps ensure that students are properly tracked, and their devices are only returned when the session has ended, further protecting students from potential risks.

Implementation

- All staff will be trained on this policy to ensure its consistent application.
- Parents and carers will receive a copy of this policy upon registration and will be reminded periodically through written communications.
- Students will be informed of the policy at the beginning of every term, and reminders will be given during the sessions.

Consequences of Non-Compliance

- Any student found using a mobile phone or digital device during a session, or refusing to hand over their device, will be subject to disciplinary action.
- Parents will be informed immediately, and the student's continued attendance at the tuition centre may be reviewed.

Section 20: Children with Special Educational Needs or Disabilities (SEND) or certain health conditions

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect or exploitation in this group of children. These 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 disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

In EmpowerEd we identify pupils and students who might need more support to be kept safe or to keep themselves safe. We do this in the following ways:

- Children will have a familiar adult to support with communication through simple language.
- Use of visual aids and sign language to support understanding where required.
- Children are carefully monitored and observed to provide a full picture of their behaviour and mannerism so that any changes are noted, and a comparison can be made.
- The use of body maps, visuals and sign language are used to allow children to communicate their needs or concerns.
- The use of social stories is regularly used to support appropriate and inappropriate behaviour – such as bullying and keeping safe.
- Strategies are available to support children in how to communicate and explain appropriate and inappropriate behaviour.

When required to use reasonable force to calm a situation, 'reasonable' means 'using no more force than is needed'. Individual plans for vulnerable children will be drawn up to reduce the use of force.

For further support and guidance:

<https://suttoninformationhub.org.uk/pages/send-local-offer>

Section 21: Recognition/Signs of Abuse

The first indication of concern about a pupil's welfare is not necessarily the presence of a serious injury. Many other signs, could be an indication of abuse, these may include:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn, or clingy, or they might have difficulty sleeping or start wetting the bed
- Children with clothes which are ill-fitting and/or dirty
- Children with consistently poor hygiene
- Children who make strong efforts to avoid specific family members or friends,

without an obvious reason

- Children who are having problems during tuition sessions, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- Children who change friendships or have relationships with older individuals or groups
- Children who have a significant decline in performance
- Children who show signs of self-harm or a significant change in wellbeing
- Children who show signs of assault or unexplained injuries
- Children who have unexplained gifts or new possessions
- Children who talk about being left home alone, with inappropriate carers or with strangers
- Children who fail reach developmental milestones, such as learning to speak or walk, late, with no medical reason
- Children who are regularly missing from tuition sessions or home/school
- Children who are missing from education
- Children who are reluctant to go home after tuition sessions
- Children with poor attendance and punctuality, or who are consistently late being picked up
- Parents who are dismissive and non-responsive to practitioners' concerns
- Parents who collect their children from school when drunk, or under the influence of drugs
- Children who drink alcohol regularly from an early age
- Children who are concerned for younger siblings without explaining why
- Children who talk about running away
- Children who shy away from being touched or flinch at sudden movements.

(Please note this is not an exhaustive list)

Section 22: Role of the Designated Safeguarding Lead

Any deputies designated safeguarding leads should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

(See Appendix D for Designated Staff Details)

(See Annex C of KCSIE, 2024 for more information - [Annex C: Role of the designated safeguarding lead \(keepingchildrensafeineducation.co.uk\)](#))

Safeguarding is a standing item on all management board meetings.

All DSLs should lead on the completion of the annual safeguarding audits and return all requested information within the given time frame. This is a working document and should be used to inform future action planning and development around safeguarding.

The Designated Safeguarding Lead has a responsibility for Safeguarding and Child Protection – their key role is:

Manage referrals

The designated safeguarding lead (or deputies) will refer cases:

- of suspected abuse, neglect or exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a child is thought to be in immediate danger, to the Police as required.

Please refer to Sutton's Threshold Guidance for further information: [Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice \(suttonlscp.org.uk\)](#).

Working with others

The designated safeguarding lead (or deputies) will:

- act as a source of support, advice, and expertise for all staff.
- act as a point of contact with the safeguarding partners.
- liaise with the SLT to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult.
- as required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.

- liaise with staff on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- liaise with the EmpowerEd wellbeing officer where safeguarding concerns are linked to mental health.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- work with the relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement. This includes:
 - ensuring that EmpowerEd knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The guidance is clear that information may be shared where there are safeguarding concerns. Whilst consent to share is not necessarily required, there must be a legal basis to share.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child.

Records will include:

- 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.

The file will only be accessed by those who need to see it.

The designated safeguarding lead will ensure their child protection file is transferred to other professional organisations, such as the student's school or college.

Raising Awareness

The designated safeguarding lead (or deputies) will:

- ensure each member of staff has access to, and understands, the EmpowerEd's child protection policy and procedures, especially new and part-time staff.
- ensure EmpowerEd's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- ensure the child protection policy is available publicly and parents and carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the EmpowerEd in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with relevant staff members and wider professionals such as the student's school where necessary.

Training, knowledge, and skills

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. The designated safeguarding lead will undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care to safeguard and promote the welfare of children.
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.



- understand the importance of information sharing, both within EmpowerEd, and with the safeguarding partners, other agencies, organisations, and practitioners.
- understand and support EmpowerEd with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online during tuition sessions.
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation.
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures EmpowerEd may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

[Event List : Safeguarding \(event-booking.org\)](#)

[Bitesize Safeguarding Training Videos and Accompanying Slides – Cognus](#)

[Commonly asked questions – Cognus](#)

[Child Safeguarding Toolkit](#)

<https://safetraining.lgfl.net/>

Providing support to staff

Training will support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and



- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Additional support:

<https://www.educationsupport.org.uk/resources/for-individuals/videos/teaching-in-2023-how-to-manage-the-emotional-impact/>

wellbeing@empowered-education.co.uk

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures EmpowerEd may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The designated safeguarding lead will be equipped to:

- understand the importance of information sharing, both internally and with the safeguarding partners, other agencies, organisations, and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.
- The most important consideration is whether sharing information is likely to safeguard and protect a child. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner.
- **The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing**



information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

If the DSL is not available, staff should speak to a member of the SLT/take advice from local children's social care and/or contact a member of the Education Safeguarding Team.

Section 23: The Role of Individual Staff

The Role of Individual Staff

The Teachers' Standards 2012 state that teachers (which includes Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All EmpowerEd staff have a responsibility to provide a safe environment in which children can learn. All staff should be prepared to identify children who may benefit from early help.

All staff should be aware of systems within EmpowerEd which support safeguarding, and these will be explained to them as part of staff induction. This includes: the child protection policy (including the policy and procedures to deal with Child-on-Child Abuse); the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying); staff behaviour policy (EmpowerEd staff code of conduct); safeguarding responses; and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

All staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them he/she is being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that



they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The Role of the Senior Leadership Team

The senior leadership team has a strategic leadership responsibility for EmpowerEd's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must ensure that policies, procedures, and training in the company is effective and always complies with the law.

The senior leadership team will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at EmpowerEd are effective and support the delivery of a robust whole company approach to safeguarding. Their training should be regularly updated.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the SLT will do all that they reasonably can to limit children's exposure to the above risks from EmpowerEd's IT system. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The SLT should consider the age range of the children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

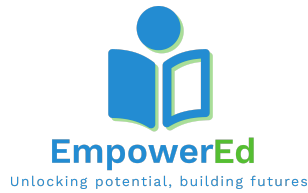
The Senior Leadership Team will make sure that:

The designated safeguarding lead (DSL) takes responsibility for understanding the filtering and monitoring systems and processes in place as part of their role (KCSIE 2024). All staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training (KCSIE 2024).

Section 24: Training

Induction training is mandatory and must also include:

- the Safeguarding and Child Protection policy and procedures.
- Online Safety (including Filtering and Monitoring).
- the Behaviour Policy.



- the Staff Code of Conduct.
- the safeguarding response to children who are absent from scheduled tuition sessions, on repeat occasions and/or prolonged periods or where the absence is persistent or unexplainable.
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

All staff will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All staff also receive training in data protection matters to ensure that they are kept up to date with their duties and obligations to protect information about the children.

Safer Recruitment training is available to all relevant staff who are involved in the recruitment process.

A record is kept of staff training – type of training and dates.

The SCR should be checked regularly by a member of the Senior Leadership Team.

Section 25: Confidentiality of Records

Our pupils and students and their parents/carers have the right to expect that all staff will deal sensitively and sympathetically with their situation. It is important that information is only available to those who need to know it. Parents/carers and where appropriate pupils and students should be told their right to confidentiality may be breached if information comes to light suggesting possible harm to a child. Safeguarding/Child Protection issues relating to individual cases **must not** be subject to open discussion in the staff room or elsewhere in EmpowerEd.

All personally identifiable information will be kept securely, following EmpowerEd's obligations under the latest Data Protection Act in England and the General Data Protection Regulations (GDPR) set down by the European Union.

Members of staff should also remember not to promise to pupils and students to keep "secrets" (see *procedure below*).

Section 26: Working with Children

We recognise that children, who are abused, neglected, exploited, or who witness either of these things, may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame. EmpowerEd tuition sessions may be the only stable, secure, and predictable element in the lives of children at risk. When at



tuition their behaviour may be challenging and defiant or they may be withdrawn. EmpowerEd will support pupils and students and enable them to feel safe through:

- the content of their sessions.
- EmpowerEd ethos which promotes a positive, supportive, and secure environment and gives pupils and students a sense of being valued.
- EmpowerEd behaviour policy which is aimed at supporting vulnerable pupils and students in EmpowerEd - EmpowerEd will ensure the pupil knows that some behaviour is unacceptable, but they are valued and not blamed for any abuse which has occurred.
- liaison with other agencies that support the pupil such as school/college, social services, the child and adolescent mental health service, the borough school attendance service, and the educational psychology service

Section 27: Allegations involving Staff/Supply/Agency/Volunteers

- Allegations or concerns about a member of staff, worker or volunteer must immediately be notified to the DSL. This guidance should be followed where it is alleged that anyone working in EmpowerEd including staff, volunteers and contractors has:
 - behaved in a way that has harmed a child, or may have harmed a child and/or;
 - possibly committed a criminal offence against or related to a child and/or;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- The DSL will always consult the Designated Officers (in Sutton, this person is still known as the Local Authority Designated Officer or LADO) within one working day. The LADO will conduct any investigation, convene an Allegations Against Staff/Volunteers Meeting (ASV) and involve other agencies as appropriate
- Following consultation, the DSL will decide on appropriate action, which may include consideration of disciplinary proceedings
- It is important to bear in mind that although the concern may relate to an individual student, other students may also be at risk
- EmpowerEd will promote an open and transparent culture in which all concerns about all adults working in or on behalf of EmpowerEd are dealt with promptly and appropriately. This should encourage an open and transparent culture; enable EmpowerEd to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of EmpowerEd are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of EmpowerEd.

Allegations or concerns about an adult working at EmpowerEd whether as a tutor,, other staff, volunteers, or contractors



We recognise the possibility that adults working in EmpowerEd may harm children, including senior managers, volunteers, tutors, and staff. Any concerns about the conduct of other adults in EmpowerEd should be taken to the DSL without delay; any concerns about the DSL should go to a Deputy DSL or a senior manager who can be contacted by: 07565582321

Any concerns about the conduct of a member of staff, tutors, volunteers or contractors should be reported to the DSL.

Keeping Children Safe during Community activities, after school clubs and Tuition

This is non-statutory guidance from the Department for Education (DfE). It aims to help providers of out-of-school settings (OOSS) understand best practice for creating a safe environment for children in their care and give parents and carers confidence that their child is in a safe activity or learning environment.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/940872/Keeping_children_safe_code_of_practice.pdf

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The DSL must decide whether the concern is an allegation or low-level concern, and this should be done in consultation with the LADO. 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 for referral to the Local Authority Designated Officer (LADO) (see below). By having a discussion with the LADO, you are able to get assurance that the necessary action has been taken.

Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside of EmpowerEd).

(*Person could be anyone working in EmpowerEd that provides education for children under 18 years of age, including tutors, volunteers, and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, EmpowerEd should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any



foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, EmpowerEd, or a combination of these.

Low-level Concerns

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

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, contrary to EmpowerEd policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

If the DSL is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm for threshold, they should consult with their LADO. We would suggest calling the LADO to talk your concern through for support and assurance purposes in all cases.

If the concern has been raised via a third party, the DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously.
- to the individual involved and any witnesses.

Reports about part-time tutors and contractors should be notified to their other employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely, and comply with the Data Protection Act 2018. EmpowerEd should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within EmpowerEd that enabled the behaviour to occur. This might mean that policies or processes could be revised, or extra training delivered to minimise the risk of it happening again.

See also Developing and implementing a low-level concerns policy (Farrer & Co):

<https://www.farrer.co.uk/news-and-insights/developing-and-implementing-a-low-level-concerns-policy-a-guide-for-organisations-which-work-with-children2/>

- The procedures in 'Keeping Children Safe in Education' (*DfE, September 2024*), 'Working Together to Safeguard Children' (*HM Government, December 2023*) and the Sutton Local Safeguarding Children Partnership procedures will be followed in all such cases.
- When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case.
- If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

For further training on the role of the LADO:

[Sutton Local Safeguarding Children Partnership - Induction Modules \(suttonlscp.org.uk\)](https://suttonlscp.org.uk)

Please also refer to the LADO Protocol:

[Sutton Local Safeguarding Children Partnership - LSCP Protocols \(suttonlscp.org.uk\)](https://suttonlscp.org.uk)

Section 28: Allegations against other children

- If an allegation of abuse is made against other children by children, then this must be reported immediately, in accordance with this policy.
- This will then be reported to the Children's First Contact Service (CFCS) by a designated person or deputy designated person.
- Abuse or concerns about a risk of abuse or harm by other children/young people is subject to the same safeguarding procedures as in respect of children or young people being abused by an adult.
- Professionals responding should be alert to the risk a child/young person may pose



- to children/young people other than any 'current' victim; and
- Children or young people who harm others are likely to have considerable needs themselves (e.g., they may have been subjected to abuse, witnessed domestic violence, or committed criminal offences).

Section 29: Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in EmpowerEd's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team.

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

The NSPCC whistleblowing helpline is available as an alternative route for staff that do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school.

Staff can call 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or email: help@nspcc.org.uk.

Section 30: Role of the Responsible Adult

Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by EmpowerEd to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on the incident log for the relevant student.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
 - a. a police officer;
 - b. employed by the police;
 - c. under the direction or control of the chief officer of a police force; or

¹ The police caution is: "You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."

² A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.



- d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

Section 31: Child Protection Procedures

When a child discloses, or you are aware there is a safeguarding issue

Do NOT DELAY

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a meeting/tutoring session to do this – do not leave notes in the Designated Safeguarding Lead's email / drawer as they may not get back to check their post until the pupil has gone home.
- Early referral gives more time to offer help to the pupil and family before the situation becomes more serious.
- When the matter is already severe or serious, early referral gives more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult the Children's First Contact Service (CFCS).

MAKE WRITTEN NOTES

In Summary

Receive – listen to what the student wants to tell you.

Reassure – that they are believed, and their concern will be followed up.

React – ask open questions and then speak to the DSL.

Record – make a written record of the conversation and pass it to the DSL.

Refer – via the DSL and using the local referral process.

It is important to remember that students may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. **If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.**

Referral Process

Any member of staff can make a referral to the Children's First Contact Service (CFCS) or the Police, but they should always consult the Designated Safeguarding Lead wherever possible.

The designated staff may contact the Children's First Contact Service (CFCS) to make a referral or take advice or contact the child's social worker (if allocated).

If staff are concerned that the child or family involved have been exposed to radicalisation or extremist behaviour, then they will make a Prevent referral. The referral form for Prevent can be found here:

[Statutory Prevent Duty - Sutton Council](#)

Remember

- If in doubt, consult.
- Do not ignore concerns, even if these are vague.
- The first responsibility of staff is to the pupil.
- If you need help or support to manage your own feelings, this can usually be provided.

Contact with the family

Contact with the family **should always** be discussed with the Designated Safeguarding Lead, who may consult the Children's First Contact Service (CFCS) or the Education Safeguarding Team.

In cases where a minor physical injury causes concern, then EmpowerEd's policy for dealing with accidents should be followed. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the pupil from harm), advice must be taken immediately from the Children's First Contact Service (CFCS).

In cases of possible neglect or emotional abuse, the concern may have built up over a period of time. There may have been discussion previously between staff and the family about sources of help, but if concerns persist, the Designated Safeguarding Lead will need to refer to the Children's First Contact Service and will normally advise the family of this unless specifically told otherwise.

In cases where there are suspicions of sexual abuse or physical chastisement, the Designated Safeguarding Lead will unpick with the child first and then seek

immediate advice from the Children's First Contact Service before discussing this with the family.

A flow chart on how to manage disclosures of Physical Chastisement is now included in Sutton's Threshold Guidance.

Recording

- Where there are concerns about a pupil, our electronic files have an appropriate flag to indicate concern.
- All records relating to child welfare concerns will be kept on the pupil 's child protection file and the file will be kept secure - a chronology of concern will be kept by the designated teacher.
- Written records of any concerns about pupils and students are kept, even where there is no need to refer the matter immediately.
- Information from records will only be accessed on a "need to know" basis; access is strictly controlled by the designated teacher.
- Key staff will need to know when a pupil is subject to a Child Protection Plan, so they can monitor the pupil's welfare.
- Records relating to the pupil's welfare will remain on the pupil's file as long as the pupil is attending tuition sessions at EmpowerEd.

Working with other agencies

- All staff have a legal duty to assist local authority Children 's Social Care or the Police when they are making enquiries about the welfare of pupils and students.
- Information about a pupil must therefore be shared on a "need to know" basis with other agencies.
- When telephone requests for information are received, **always** maintain security by checking the telephone number listing for the caller and calling back to a switchboard number **before** giving information or confirming the pupil is attending EmpowerEd.
- Always advise the designated safeguarding lead about such requests for information.
- Requests for attendance at meetings about individual pupils and students (e.g., child protection conferences) should be notified to the DSL or a DDSL, who will arrange preparation of a report and attendance at the meeting.
- Reports should contain information about the child's tuition sessions and include:
 - o academic progress
 - o attendance
 - o behaviour
 - o relationships with children and adults
 - o family



- o any other relevant matter.
- Reports should be objective, distinguishing between fact, observation, allegation, and opinion.
- Unless you specify otherwise, reports will normally be made available to the pupil's family.

Pupils and students subject to a Child Protection Plan

- The name of the key social worker must be clearly recorded on the pupil's record.
- EmpowerEd will participate fully in the work of Core Groups for these pupils and students, to assist with the objectives of the Child Protection Plan for the pupil - where appropriate and requested by the school / social worker.
- When a pupil is subject to a Child Protection Plan, EmpowerEd will report all unexplained absences even if only of a day.
- When a pupil is subject to a Child Protection Plan, EmpowerEd will report all behavioural changes or other concerns to the key social worker

Child's need for a social worker

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare.

All staff must always observe the above policy and procedure. They will be reviewed annually and as required in line with changes in local (LSCP) or national guidance.

Section 32: Definitions of Specific Safeguarding Issues

DEFINITIONS OF SPECIFIC SAFEGUARDING ISSUES

Bullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the four main types of bullying are: physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling), social (e.g. isolating an individual from the activities, lying and spreading rumours, damaging someone's reputation and carrying out acts behind a person's back to cause humiliation) and cyber (e.g. sending abusive or hurtful texts, emails, posts, images or videos, deliberately excluding others online, spreading gossip or rumours and imitating others online or using their log-in details).

Child Abduction and Community Safety Incidents

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

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

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

Children who are lesbian, gay, bisexual, or gender questioning

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.

However, the Cass review identified that 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 spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, 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 our 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.

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- Have older boyfriends or girlfriends; and
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home;



- Have been the victim or perpetrator of serious violence (e.g. knife crime);
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- Are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- Are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- Owe a ‘debt bond’ to their exploiters;
- Have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office and The Children’s Society County Lines Toolkit For Professionals](#)

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or a deputy) and involve local authority children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).



Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

Please click here to access Sutton’s FGM resources:

[Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice \(suttonlscp.org.uk\)](https://suttonlscp.org.uk)

So-called ‘honour-based’ abuse (including FGM and forced marriage)

So-called ‘honour’-based abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children’s social care.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

Radicalisation and Extremism

Children may be susceptible to extremist ideology and radicalisation. 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 [147] is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of

different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation [148] refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism [149] 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.

[147] As defined in the Government's Counter Extremism Strategy www.gov.uk/government/publications/counter-extremism-strategy.

[148] As defined in the Government's Prevent Duty Guidance for England and Wales. www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales

[149] As defined in the Terrorism Act 2000 (TACT 2000) www.legislation.gov.uk/ukpga/2000/11/contents

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are **possible indicators** that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect people from extremist ideologies and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard [150] to the need to prevent people from being drawn into terrorism". [151] This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised **Prevent duty guidance: for England and Wales**, especially **paragraphs 57-76**, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiar themselves with the **Prevent duty**

guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

[150] According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

[151] "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

All staff will undertake Prevent awareness training.

Further resources:

[Educate Against Hate - Prevent Radicalisation & Extremism](#)

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](#)

[Prevent duty self-assessment tool for schools - GOV.UK \(www.gov.uk\)](#)

[Prevent duty training - GOV.UK \(www.gov.uk\)](#)

[Prevent duty guidance - GOV.UK \(www.gov.uk\)](#)

Child-on-Child Abuse

Staff should be aware that safeguarding issues can manifest themselves via Child-on-Child Abuse/harm. 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 nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery).
- up skirting, 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).

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Child-on-Child Abuse/harm can be a one-off serious incident or an accumulation of incidents. It can involve physical, emotional, or sexual abuse. Child-on-Child Abuse/harm involves someone who abuses a ‘vulnerability’ or power imbalance to harm another and have the opportunity or be in an environment where this is possible. While perpetrators of Child-on-Child Abuse/harm pose a risk to others, they are often victims of abuse themselves.

We recognise that even if there are no reported cases of Child-on-Child Abuse, such abuse may still be taking place and is simply not being reported.

We recognise that it is more likely that girls will be victims and boys’ perpetrators, but that all Child-on-Child Abuse is unacceptable and will be taken seriously

Up skirting Voyeurism (Offences) Act 2019

The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12th April 2019. Up skirting typically involves taking a picture under a person’s clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual



gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Private Fostering

The phrase 'private fostering' is often misunderstood. There is local authority fostering and fostering by private agencies. However, in law 'Private Fostering' is quite different.

From a safeguarding perspective, many private fostering arrangements are 'hidden' and, it appears, are rarely brought to the attention of local authorities, even though it is an offence not to inform them. The penalty for non-reporting is a maximum £5,000 fine, but it seems that convictions are extremely rare.

What is Private Fostering?

A private fostering arrangement is one that is made privately (without the involvement of a local authority (or a private sector agency)) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins).

The local authority should be notified of the arrangement, at least six weeks before it starts and not to do so is a criminal offence.

Once the local authority has been notified, children's services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carers household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

[Sutton Local Safeguarding Children Partnership - Private Fostering \(suttonlscp.org.uk\)](http://suttonlscp.org.uk)

Breast Ironing

Breast Ironing is practised in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

Disguised Compliance

Parents who appear to cooperate to avoid professionals getting too close or asking too many questions. There is a tendency by professionals to confuse participation with cooperation. Indicators include parents that put little effort into making changes, limited improvement despite significant input, conflicting views of child and parent, parents align with certain professionals and only engage with part of the plan. The risks of disguised compliance are that cases may drift and lack focus, significant issues may be missed, risks may increase, cases may be closed too early, and the child remains at risk of harm. It is important to keep an open mind, use an investigative approach and effective questioning. As professionals we must look beyond the obvious.

Hidden Children

Children who do not attend school can become hidden, which means that we are less able to help and protect them. Some of these children may experience risks within their family, such as abuse, neglect or exploitation. There may also be risks outside their family, such as radicalisation or exploitation. Protecting children from these external risks is known as contextual safeguarding. Children who do not attend school may be at further risk of not achieving their educational potential. They may not be able to access formal education or employment in the future if they have not gained recognised qualifications. They will also not benefit from the role that schools play in developing children's skills to participate fully and constructively in society.

So which children are we talking about?

1. Children not attending school nor on a school roll, including children who have been excluded both on a permanent or an informal basis and for whom no suitable alternative provision is arranged.
2. Children who fall under the heading 'educated at home', but may not be receiving effective, efficient, and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.
3. Children attending unregistered schools, sometimes under the guise of being electively home educated.
4. Children in alternative provision that is of insufficient quality or is not provided for the required hours.
5. Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.

Domestic Abuse



The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. 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. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, 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 to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued 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 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.

Operation Encompass

In May 2024, the Victims and Prisoner’s Act received Royal Assent. This places a statutory duty on all police forces in England and Wales to participate in Operation Encompass.

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the 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 (or a deputy)) 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 local authority 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.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

Operation Encompass is currently under review in Sutton.

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

Transform Sutton - 020 8092 7569 / transformsutton@cranstoun.org.uk

[Not Alone in Sutton](#)

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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 violence/effects of domestic violence on children](#);
- [Safe Young Lives: Young people and domestic abuse | Safelives](#);
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#) (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).

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms

of illness in the child.

Adverse Childhood Experiences (ACEs)

1 in 3 diagnosed mental health conditions in adulthood are directly related to adverse childhood experiences. ACEs can include maltreatment, violence and coercion, adjustment, prejudice, family adversity, inhumane treatment, adult responsibilities and bereavement and survivorship. If you have witnessed or experienced any of the following before the age of 18 you have suffered an adverse childhood experience: domestic violence, sexual abuse, alcohol abuse, physical abuse, parental separation, drug abuse, verbal abuse, mental ill-health, or imprisonment.

Protective factors:

1. Positive and supportive family
2. Safe relationships with peers
3. Access to a supportive community
4. Ability to regulate emotions
5. Acquisition of problem-solving skills
6. Compassionate, professional response
7. Early intervention from services
8. Trauma-informed systems

When talking to someone who has suffered an ACE, don't ask, what is wrong with you?
But, what has happened to you?

Trauma and Attachment

A significant number of children are exposed to traumatic life events. A traumatic event is one that threatens injury, death, or the physical integrity of self or others and also causes fear, terror, or helplessness at the time it occurs. Traumatic events include sexual abuse, physical abuse, domestic violence, community and school violence, medical trauma, car accidents, acts of terrorism, war experiences, natural and human-made disasters, suicides, and other traumatic losses.

If a child has experienced trauma, they are likely to develop other related behaviours.

These include:

1. the development of new fears
2. separation anxiety (particularly in young children)
3. sleep disturbance, nightmares
4. sadness

5. loss of interest in normal activities
6. reduced concentration
7. decline in schoolwork
8. anger
9. somatic complaints
10. Irritability

Contextual Safeguarding

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are 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.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside of 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 exploitation, criminal exploitation, and serious youth violence.

To access Sutton's Safeguarding Adolescents Protocol, please click on the link below:

[Sutton Local Safeguarding Children Partnership - LSCP Protocols \(suttonlscp.org.uk\)](https://suttonlscp.org.uk)

For further information:

[Contextual Safeguarding Research Durham University](#)

Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

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

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.



The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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 Statutory Guidance: [Modern slavery: how to identify and support victims - GOV.UK](#).

Cyber Crime



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 skills 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 designated safeguarding lead (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: [Cyber Choices](#), and [National Cyber Security Centre - NCSC.GOV.UK](#).

(Please refer to Annex B of KCSIE, 2024 for further information and links to resources and support - [Annex B: Further information \(keepingchildrensafeineducation.co.uk\)](#)

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils. All staff should be aware that 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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems (KCSIE, 2024).

Anxiety

Anxiety problems can significantly affect a child's ability to develop, to learn or to maintain and sustain friendships.

Children and young people may feel anxious for several reasons – for example because of worries about things that are happening at home or at school, or because of a traumatic event. Symptoms of anxiety include feeling fearful or panicky, breathless, tense, fidgety, sick, irritable, tearful, or having difficulty sleeping. If they become persistent or exaggerated, then specialist help, and support will be required.

Clinical professionals refer to several diagnostic categories:

- Generalised anxiety disorder (GAD) – a long-term condition which causes people to feel anxious about a wide range of situations and issues, rather than one specific event.
- Panic disorder – a condition in which people have recurring and regular panic attacks, often for no obvious reason.
- Obsessive-Compulsive Disorder (OCD) – a mental health condition where a person has obsessive thoughts (unwanted, unpleasant thoughts, images or urges that repeatedly enter their mind, causing them anxiety) and compulsions (repetitive behaviour or mental acts that they feel they must carry out to try to prevent an obsession coming true).
- Specific phobias – the excessive fear of an object or a situation, to the extent that it causes an anxious response, such as panic attack.
- Separation Anxiety Disorder (SAD) – worry about being away from home or about being far away from parents/carers, at a level that is much more than normal for the child's age.
- Social Phobia – intense fear of social or performance situations.
- Agoraphobia – a fear of being in situations where escape might be difficult, or help wouldn't be available if things go wrong.

Depression

Feeling low or sad is a common feeling for children and adults, and a normal reaction to experiences that are stressful or upsetting. When these feelings dominate and interfere with a person's life, it can become an illness.

Depression can significantly affect a child's ability to develop, to learn or to maintain and sustain friendships.

Clinicians making a diagnosis of depression will generally use the categories major depressive disorder (MDD – where the person will show a number of depressive symptoms to the extent that they impair work, social or personal functioning) or dysthymic disorder (DD – less severe than MDD but characterised by a daily depressed mood for at least two years).

Hyperkinetic Disorders

(e.g., disturbance of activity and attention)

Although many children are inattentive, easily distracted, or impulsive, in some children these behaviours are exaggerated and persistent, compared with other children of a similar age and stage of development. When these behaviours interfere with a child's family and social functioning and with progress at school, they become a matter for professional concern.

Attention Deficit Hyperactivity Disorder (ADHD) is a diagnosis used by clinicians. It involves three characteristic types of behaviour – inattention, hyperactivity, and impulsivity. Whereas some children show signs of all three types of behaviour (this is called 'combined type' ADHD), other children diagnosed show signs only of inattention or hyperactivity/impulsiveness.

Hyperkinetic disorder is another diagnosis used by clinicians. It is a more restrictive diagnosis but is broadly like severe combined type ADHD, in that signs of inattention, hyperactivity and impulsiveness must all be present. These core symptoms must also have been present before the age of seven and must be evident in two or more settings.

Attachment disorders

Attachment is the affectionate bond children have with special people in their lives that lead them to feel pleasure when they interact with them and be comforted by their nearness during times of stress. Researchers generally agree that there are four main factors that influence attachment security: opportunity to establish a close relationship with a primary caregiver; the quality of caregiving; the child's characteristics; and the family context. Secure attachment is an important protective factor for mental health later in childhood, while attachment insecurity is widely recognised as a risk factor for the development of behaviour problems.

Eating disorders

The most common eating disorders are anorexia nervosa and bulimia nervosa. Eating disorders can emerge when worries about weight begin to dominate a person's life. Someone with anorexia nervosa worries persistently about being fat and eats very little. They lose a lot of weight and if female, their periods may stop. Someone with bulimia nervosa also worries persistently about weight. They alternate between eating very little, and then bingeing. They vomit or take laxatives to control their weight. Both eating disorders affect girls and boys but are more common in girls.

Self-harm

Self-harm is a serious public health problem and is the reason behind many admissions to accident and emergency departments every year. Self-harm and suicidal threats by a child/young person put them at risk of significant harm and should always be taken seriously and responded to without delay.

Common examples of deliberate self-harm include 'overdosing' (self-poisoning), hitting, cutting, or burning oneself, pulling hair or picking skin, or self-strangulation. The clinical definition includes attempted suicide, though some argue that self-harm only includes actions which are not intended to be fatal. It can be a coping mechanism, a way of inflicting punishment on oneself and a way of validating the self or influencing others.

Self-harming is NOT attention seeking behaviour, it is attention NEEDING behaviour.

EmpowerEd will follow the Sutton Self-Harm protocol in responding to concerns about self-harm: [Sutton Local Safeguarding Children Partnership - LSCP Protocols \(suttonlscp.org.uk\)](http://suttonlscp.org.uk)

Post-traumatic stress

If a child experiences or witnesses something deeply shocking or disturbing, they may have a traumatic stress reaction. This is a normal way of dealing with shocking events and it may affect the way the child thinks, feels and behaves. If these symptoms and behaviours persist, and the child is unable to come to terms with what has happened, then clinicians may make a diagnosis of post-traumatic stress disorder (PTSD).

Section 34: Sexual violence and sexual harassment

The school will follow the guidance in 'Keeping Children Safe in Education' (DfE, September 2024): **Responding to reports of sexual violence and sexual harassment.**

All school staff should be aware that students may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All school staff, but especially the designated safeguarding lead (and deputies) should consider whether children are 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.

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.



Appendix D

Section 35: Designated Staff Information

EmpowerEd Education

Designated Safeguarding Lead: Chris Vasquez, chris@empowered-education.co.uk

Deputy Safeguarding Leads: Kerri Hayes, Reuben Omnou
kerri@empowered-education.co.uk, reuben@empowered-education.co.uk

Staff Lead for Child Protection and Looked after Children: Kerri Hayes

Senior Safeguarding Lead: senior-safeguarding@empowered-education.co.uk

Section 36: Key Contacts

Sutton

Children's First Contact Service (CFCS) – 020 8770 6001
childrensfirstcontactservice@sutton.gov.uk

Social Care - Out of Hours – Emergency Duty Team – 0208 770 5000 x9

Sutton Local Safeguarding Children's Partnership: 020 8770 4879
suttonlscp@sutton.gov.uk

Website: www.suttonlscp.org.uk

Sutton LA LADO (Local Authority Designated Officer – complaints against staff) –
0208 770 4776 (LADO@sutton.gov.uk)

For escalation procedures, please click on the link below:
[Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice \(suttonlscp.org.uk\)](http://suttonlscp.org.uk)

[Escalation Process – Cognus](#)

For the Sutton CFCS Operating Protocol which includes guidance on what to do in relation to a serious incident or child death, please click on the link below:

[cfcs-operating-protocol-2024.pdf](#)

General Contacts:

- Ofsted 0300 123 1231
- Ofsted whistle blowing line – 0300 123 3155
- Police 999
- NSPCC 0808 8005000
- NSPCC whistle blowing helpline number – 0800 028 0285
- ChildLine 0800 11 11



Appendix F