



# Safeguarding and Child Protection Policy

**September 2025**

*Signed: Caroline Murphy*

*Position: Business Manager*

Last Reviewed: September 2025

Next Review Date: September 2026

*In accordance with Nottingham City Schools Safeguarding and Child  
Protection Policy Framework  
September 2024*

TBAC

## Safeguarding Policy

The policy reflects current legislation, accepted best practice and complies with the government guidance: Working Together to Safeguard Children 2023 and Keeping Children Safe in Education September 2024.

This policy was written and adopted in November 2020. *It has been approved by the Directors and Senior Leadership Team. The policy is updated annually.*

It is due for review in twelve months: September 2025

Other policies that may need to be taken into account are:

- *Anti-bullying and discrimination*
- *PSHE*
- *Drugs*
- *Confidentiality*
- *Behaviour management and positive intervention*
- *Attendance (including children missing from education)*
- *Special needs*
- *Health and safety*
- *Safer recruitment*
- *Physical intervention*
- *E-safety*
- *Management of Allegations*
- *Intimate Care*
- *Touching*
- *Use of Mobile Phones and Cameras*
- *Whistleblowing policy*
- *Staff Conduct policy (Code of Conduct)*

- *Visitors' policy*
- *Children in Care / Previously Children in Care (was known as Looked After Children / Previously Looked After Children)*
- *Equality*
- *Data Protection Policy*

Schools (including independent schools, non-maintained special schools, Academies and free schools) and Further Education (FE) institutions should give effect to their duty to safeguard and promote the welfare of their pupils under section 175/157 the Education Act 2002 and where appropriate under the Children Act 1989 by:

- Creating and maintaining a safe learning environment for children and young people; and,
- Identifying where there are child welfare concerns and taking action to address them, in partnership with other organisations where appropriate.

Governing bodies and proprietors should consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. Preventative education should be taught that prepares pupils for life in modern Britain and creates a culture of zero tolerance for discrimination, harassment and abuse of any kind. This may include covering relevant issues through personal, social health and economic education (PSHE), and/or – for maintained schools and colleges – through sex and relationship education (RSE).

**Working Together to Safeguard Children 2023 & Keeping Children Safe in Education 2024**

**Statutory duties that apply to schools**

Schools should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, including:

- Ensuring that the school or college contributes to inter-agency working in line with statutory guidance *Working Together to Safeguard Children 2023*. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to, for example, children subject to child protection plans and children in care and children previously in care,
- A clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children
- A senior member of staff to take leadership responsibility for the school's safeguarding arrangements
- A culture of listening to children and taking account of their wishes and feelings and ensuring there are systems in place for children to express their views and give feedback
- Ensuring there are procedures in place to respond robustly to allegations, including those relating to children harming, or allegedly harming other children (including sexual violence and sexual harassment) and allegations against staff and volunteers
- Arrangements which set out clearly the processes for sharing information, with other professionals and with the local Safeguarding Partners (previously LCSCB's);
- A designated professional lead for safeguarding. Their role is to support other members of staff, to recognise the needs of children, including recognising and responding to possible abuse or neglect. Designated leads should be a member of the school senior leadership team and their roles should always be explicitly defined in job descriptions. They should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.
- Safe recruitment practices for individuals whom the organisation will permit to work regularly with children (Keeping Children Safe in Education 2024 pages 56-91, paragraphs 210 – 358 ) including

policies on when to obtain a relevant Disclosure and Barring Scheme (DBS) check;

- Safer recruitment practices will include an online check of shortlisted candidates as outlined on page 59, paragraph 226 of Keeping Children Safe in Education 2024;
- Schools and colleges must keep a single central record of DBS checks and training undertaken (p.75 paragraph 274 Keeping Children Safe in Education 2024). The record must cover the following people:
  - All staff (including supply staff) who work in the school; in colleges, this means those providing education to children
  - All others who work in regular contact with children in the school or college, including volunteers
  - For independent schools, including academies and free schools, all members of the proprietary body.
- It is the school's responsibility to ensure that all the staff they employ in specified early or later years childcare have had the appropriate checks. This includes ensuring that staff working in early and later years settings are suitable to do so. The DfE issued updated guidance for schools in August 2018, entitled Disqualification Under the Childcare Act 2006 of teachers and other school staff working in early or later years provision, or those who are directly concerned with the management of such provision.
- Relevant staff are those working in childcare, or in a management role because they are: working with reception age children at any time; or working with children older than reception until age eight, outside school hours.
- Keeping Children Safe in Education 2024 page 75, paragraph 272 also refers to disqualification: "For staff who work in childcare provision or who are directly concerned with the management of such provision, employers need to ensure that appropriate checks

are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018”.

- Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role
- Staff should be given mandatory safeguarding training at the point of induction, which includes familiarisation with safeguarding responsibilities and procedures to be followed if anyone has any concerns about a child’s safety or welfare. Staff in schools and colleges should ensure that all staff read and understand at least part one of Keeping Children Safe in Education 2024. There should be an ongoing program of refresher training and updates to staff/volunteers about key safeguarding issues, e.g. Information shared at the Designated Safeguarding Leads network meeting. Such updates should be at least annually (Keeping Children Safe in Education 2024, page 35 paragraph 123), with suggested three yearly ‘Introduction to Safeguarding and Child Protection’ training for all staff (Nottingham City Safeguarding Children’s Partnership recommendation)
- Ensure there is an effective child safeguarding policy in place together with a school behaviour policy, schools response to children who go missing from education, staff behaviour policy (code of conduct) and a whistleblowing policy. These should be provided to all staff – including temporary staff and volunteers – on induction
- All professionals should have regular reviews of their own practice to ensure they improve over time
- The designated lead professional for safeguarding should maintain comprehensive records, which should be used to inform a review of the support and level of concern child’s circumstances whenever new information arises;
- All schools and colleges must be compliant with the requirements of the LSCB in Nottingham and this includes engagement in the Serious Case Review process
- Nottingham City Safeguarding Partners require all schools to complete an annual safeguarding audit and be engaged in multi-agency processes and Serious Case Reviews (See Working Together

to Safeguard Children 2023 (Chapter 2 p23 & chapter 3 p43), to be read in conjunction with dfe Keeping Children Safe in Education 2024

- Clear policies in line with those from the Safeguarding Partners for dealing with allegations against people who work with children, in either a paid or voluntary capacity. For any safeguarding allegation, the school will follow their safeguarding policy and procedures, including informing the Local Authority Designated Officer (LADO)- Keeping Children Safe in Education, 2024 page 96, paragraph 384. An allegation may relate to a person who works with children who 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 they 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.

In addition:

The Local Authority Designated Officer (LADO) is to be involved in the management and oversight of individual cases where there are allegations made against people who work with children. The Designated Officer will provide advice and guidance to schools, liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, and are consistent with a thorough and fair process:

- Any allegation should be reported immediately to the Head of Provision of the Centre. Where the allegation relates to the Head of Provision or Principal it should be reported to a Deputy Head of Provision or equivalent. The Local Authority Designated Officer should be informed within one working day of all allegations that come to an employer's attention or that are made directly to the police; and
- If an organisation removes an individual (paid worker or unpaid volunteer) from work such as looking after children (or would have, had the person not left first) because of a safeguarding concern that the person may pose a risk of harm to children, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.
- Paragraph 430-452 of Keeping Children Safe in Education 2024 highlights the need for schools to have processes for managing low level concerns that do not meet the harm threshold and advises a close focus on record keeping of such concerns and early intervention is expected to be included in safeguarding training for all staff.

In addition to these duties, which apply to schools, further safeguarding duties are also placed on them through other statutes. The key duties that fall on schools are set out below.

*\* Schools and colleges*

*Section 175 of the Education Act 2002 places a duty on local authorities (in relation to their education functions and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions. The same duty applies to independent schools (which include Academies and free schools) by virtue of regulations made under section 157 of the same Act.*



*In order to fulfill their duty under sections 157 and 175 of the Education Act 2002, all educational settings to whom the duty applies should have in place the arrangements as set out above. In addition schools should have regard to specific guidance given by the Secretary of State under sections 157 and 175 of the Education Act 2002.*

## Introduction

At TBAC the Directors and staff fully recognise the contribution the centre makes to safeguarding children. We recognise that the safety and protection of all pupils is of paramount importance and that all staff, including volunteers, have a full and active part to play in providing early help protecting pupils from harm. We believe that the school should provide a caring, positive, safe and stimulating environment which promotes all pupils' social, physical, emotional and moral development. In delivering this ambition we will adhere to the principles set out in Nottingham's Safeguarding Children Partnership Threshold of Need and Nottingham City Safeguarding Partners Policy, Procedures and Practice Guidance.

Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children, in line with Working Together 2023 and Keeping Children Safe in Education 2024.

The aims of this policy are to:

- Confirm that the pupils' development is supported in ways that will foster security, confidence and independence
- Raise the awareness of teachers, non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- Confirm the structured procedures to be followed by all members of the school community in cases of suspected harm or abuse
- Emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child

safeguarding, mental and physical health, attendance, safety and other safeguarding responsibilities

- Emphasise the importance of maintaining and implementing appropriate safeguarding policies, procedures and arrangements of those service providers who use the school's premises through extended schools or provide any other before and after school activities
- Highlight the connection between the safeguarding policy and the school's policy for safe recruitment of staff and volunteers, and for managing allegations
- Confirm the working relationship with children and families direct, Nottingham City safeguarding partners and other agencies and, where appropriate with similar services in neighbouring authorities.

## Responsibilities

- i. **The governing body:** has a trained person for Safeguarding, who will attend training/updates at least every three years and will also receive the regular safeguarding updates referred to above
  - will ensure a member of the governing body is nominated to liaise with the local authority and/or partner agencies on issues of child protection in relation to safeguarding and in the event of allegations of abuse made against the Headteacher, the Principal of a college or proprietor or member of governing body of an independent school.
- will ensure that the Centre has a child safeguarding policy, single central record, staff conduct policy and procedures in place, operates safe

recruitment procedures, makes appropriate checks on staff and volunteers and has procedures for dealing with allegations against staff and volunteers that all comply in accordance with Nottingham City Safeguarding Partners.

- will ensure that schools and colleges create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might pose a risk to children (Part three: Safer Recruitment, Keeping Children Safe in Education 2024).
- has appointed a member of staff of the Centre leadership team to the role of designated safeguarding lead.
- will ensure the centre keeps an up-to-date single central record of pre-employment checks, specifying when the check was made and when it will be renewed.

- monitors the adequacy of resources committed to child safeguarding, and the staff and governor training profile
- recognises that neither it, nor individual Directors, have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against staff)
- ensure that the child safeguarding policy is available to parents and children on request
- will ensure this policy and practice complements other policies e.g. anti-bullying including cyber bullying, health and safety, to ensure an integrated model of safeguarding operates across the Centre.
- Will ensure that they develop a safeguarding culture and facilitate a whole school approach to safeguarding.
- Will ensure that all safeguarding processes and policies operate with the best interests of the child.
- Ensuring that the child's wishes and feelings are taking in to account when action is determined by school leaders.

Governors in maintained schools are required to have an enhanced criminal records certificate from the DBS & the Teacher Services' web page.

Schools can easily check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction (Keeping children safe in Education 2024 Page 84, paragraph 321). It is the responsibility of the governing body to apply for the certificate for any of their governors who do not already have one. Governance is not a regulated activity and so governors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity. Schools should also carry out a section 128 check for school governors, because a person subject to one is disqualified from being a governor.

**ii. The Head of Provision will ensure that:**

- The policies and procedures adopted by the Governing Body are followed by all staff
- The policy will be updated annually and be available publicly either via the school or college website or by other means.
- Designated staff review policy when the Nottingham City Safeguarding Partners update their policies and procedures
- Sufficient resources and time are allocated to enable the designated persons and other staff to discharge their responsibilities including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of children and young people and be appropriately trained.
- A single central database of all staff and volunteers, and their safeguarding training dates is maintained and that this list confirms that all staff and those volunteers who meet the specified criteria have had a DBS check, when this check was made and when it will be renewed.
- All staff and volunteers feel able to raise their concerns about poor and unsafe practice in regard of pupils, and such concerns are addressed in a timely manner in accordance with agreed policies.

- Where there are concerns about a member of staff's suitability to work with children, contact the LADO.
- Where an allegation is made against a staff member who is not employed by the school e.g. supply teacher, the head will immediately contact both the agency concerned and the LADO. The school will continue to support any investigation that is required (Keeping Children Safe in Education, 2024 Page 96 Paragraph 380-383).
- School staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children missing from education, particularly where there are concerns regarding the potential for forced marriage or female genital mutilation. From February 2023 it is crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. (Keeping Children Safe in Education, 2024 Pages 162,)
- He/she undergoes child safeguarding training, which is updated regularly, in line with advice from the Nottingham City Safeguarding Partners.

### **iii. All DSLs need to ensure Multi-Agency working:**

The department published Working Together Transitional Statutory Guidance to support Local Safeguarding Children Boards (LSCBs), the new safeguarding and child death review partners, and the new Child Safeguarding Practice Review Panel in the transition from LSCBs and serious case reviews (SCR's) to a new system of multi-agency arrangements and local and national child safeguarding practice reviews. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area) must make arrangements to work together to safeguard and promote the welfare of local children, including

identifying and responding to their needs. Governing bodies, proprietors, management committees and their senior leadership teams, especially their designated safeguarding leads, should be aware of their local arrangements.

A list of relevant agencies is available at: [legislation.gov.uk](http://legislation.gov.uk). Schools and colleges are included.

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance *Working Together to Safeguard Children*. It is especially important that schools and colleges understand their role in the new safeguarding partner arrangements.

New safeguarding partners and child death review partner arrangements are to be in place by 29 September 2019. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Governing bodies, proprietors, management committees and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their new local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners must set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the new arrangements.

The three safeguarding partners should make arrangements to allow all schools (including multi-academy trusts) and colleges in the local area to

be fully engaged, involved and included in the new safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on how best to achieve the active engagement of individual institutions in a meaningful way.

If named as a relevant agency, schools and colleges, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.

Governing bodies and proprietors should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners.

Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

- A visitor's policy is in place that puts the safeguarding of pupils at the centre and is applied to all visitors irrespective of their status. Refer to Appendix A
  - All visitors to the Centre will be asked to bring formal identification with them at the time of their visit (unless they are

named on the approved visitors/contractors list as set out below).

- Once on site, all visitors must report to reception first. No visitor is permitted to enter the centre via any other entrance under any circumstances.
- At reception, all visitors must state the purpose of their visit and who has invited them. They should be ready to produce formal identification upon request.
- All visitors will be asked to sign in using our signing book making note of their name, organisation, who they are visiting and car registration.
- All visitors will be required to wear an identification badge and suitable lanyard (refer to Appendix A). The lanyard must remain visible throughout their visit.
- Visitors will then be escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site. The visitor must not be allowed to move about the site unaccompanied unless they are registered on the Approved Visitor List (to be on this list, the person must have a current clear DBS check and children's barred check with a copy of this registered on the school's central record. They must then follow the procedures above e.g. sign in and enter the premises via reception).

### **Mobile Phones and Cameras in Early Years, Foundation Stage and across school:**

Appropriate use of mobile phones is essential at TBAC. The use of mobile phones must not detract from the quality of supervision and care of children. Practitioners are able to use their personal mobile phones during their break times. During working hours, they must be kept out of the reach of children and parents, in a secure area accessible only to staff. All staff are made aware of their duty to follow this procedure which is set out in the Code of Conduct.

All student phones are removed from the student and stored in the centre safe until the end of their session.



Visitors to the setting (including/excluding parents) are requested not to bring their mobile phones onto the premises or to hand them in at reception for collection on departure.

We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration at TBAC. We take a mixture of photos that reflect the pre-school environment; sometimes this will be when children are engrossed in an activity either on their own or with their peers. Photos are used as a source of evidence for learning. Children are encouraged to use the camera to take photos of their peers. In order to safeguard children and adults, and to maintain privacy, cameras are not to be taken into the toilets by adults or children. All adults whether teachers/practitioners or volunteers at TBAC understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act

### **Nottingham City Schools Agreed Visiting Professionals Guidance September 2018**

- Any professional wishing to undertake work in school with children must be expected and

make a formal appointment

- The named professional must be the person who undertakes the intervention
- Professionals must show their organisation ID on arrival

- School, on production of the organisation ID must accept that all organization

safeguarding procedures have been followed by the external organisation and that DBS clearance has been obtained for that individual following the specific organisation safeguarding policy

*Schools should not deny access to professionals if they do not have a copy of their DBS certificate with them or if their clearance period is longer than that expected for school.*

*Schools are not permitted to request copies of any personal information relating to Professional Visitors – including DBS Certificates or numbers*

### **Allegations against the Headteacher**

Where an allegation is made against the Headteacher, Principal or equivalent, the Chair of the Governing Body, or equivalent, must be informed as well as the Designated Officer (LADO) 0115 8765501.

The trained designated leads (Headteacher/senior managers) for safeguarding:

1. Business Manager & DSL – Caroline Murphy
2. Head of Education & DSL – Lucy Wellings
3. Facilities Coordinator & DSL – Karen Cresswell
4. Lead Learning Mentor & DSL – Kortney Adams
5. Tutor & Mentor – Jo Banton
6. Tutor & Mentor – Josh Butler
7. Tutor & Mentor – Chris Oliver

will:

- Have their roles explicitly defined in their job descriptions
- Be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively
- Undergo updated child safeguarding training every two years.
- Liaise with relevant agencies in accordance with the Nottingham City Safeguarding Partners procedures when referring a pupil where there are concerns about possible abuse or harm
- Where there are concerns about a member of staff's suitability to work with children, contact the designated officer (LADO)
- Be able to access the contents of the Nottingham City Safeguarding Partners procedures and personnel procedures and make these accessible to all staff
- Ensure all staff, including supply staff, visiting professionals working with pupils in the school and volunteers are informed of the names and contact details of the designated leads and the school's procedures for safeguarding children
- Support staff who attend strategy meetings, looked after reviews and/or case conferences
- Support staff and volunteers who may find safeguarding issues upsetting or stressful by enabling them to talk through their anxieties and to seek further support from the school leadership group or others as appropriate
- Ensure involvement of other designated leads e.g. Where there are concerns about a pupil who is 'looked after or previously looked after'
- Support staff to reflect on the information they hold about children and provide an alternative perspective on issues in order to promote a better understanding of what may or may not be concerning
- Meet at least each half term to review procedures and case load
- Be aware of the requirement for children (investigated by the police) to have an appropriate adult (PACE)
- Take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) (Keeping Children Safe in Education 2024, Page 31, Paragraph 102)

## Designated leads will ensure that:

- Written records of concerns are kept, even if there is no immediate need for referral; and monitored using the Common Assessment Framework (CAF) or Priority Families Assessment
- All child protection records are marked as such and kept securely locked, and if these are stored electronically, that they are differently password protected from the pupils' other files, and accessible only by the Head teacher/designated leads
- Pupil records are kept separately, and marked as appropriate to indicate other confidential records are being held elsewhere
- All absence letters are dated and clearly signed by a teacher/tutor, and that if there are concerns about attendance and a pupil's wellbeing and safety, the Education Welfare Officer is contacted
- Phone calls about absences are similarly logged and dated
- The children missing education- statutory guidance for local authorities 2016 is adhered to
- Where a pupil is subject to a Child Protection Plan, and is absent without explanation for two days, their key worker in Children's Social Care is contacted.
- Records are monitored for patterns of what, when taking in isolation would appear to be low level concerns, but when viewed together indicate a pattern which requires further action.
- Where there are existing concerns about a pupil, and they transfer to another school in this or another authority, information held is transferred securely and confidentially e.g. A CAF is forwarded under confidential cover and separate from the pupil's main file to the designated lead for child safeguarding in the receiving school
- Transfer of records (once on roll at another school) is 5 working days
- Where a pupil has a **child protection plan** or there are ongoing child protection enquiries and transfers to another school;

- The designated lead for Safeguarding is informed immediately

- Their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file.

### All Designated Safeguarding Leads and Deputy Designated Safeguarding Leads need to ensure multiagency working :

Schools and colleges have a pivotal role to play in multiagency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multiagency working in line with statutory guidance Working Together to safeguard Children 2023. It is especially important that schools and colleges understand their role in the new safeguarding partner arrangements.

Working Together to Safeguard Children 2023, page 18 paragraph 27 outlines expectations for multiagency working-

- **Collaborate** : practitioners working with the same child and family share information to get a complete picture of what life is like for the child. Collectively, they ensure the child's voice is at the centre and the right support is provided.
- **Learn** : practitioners learn together by drawing on the best available evidence from their individual fields and sharing their diverse perspectives during regular shared reflection on a child's development, experiences, and outcomes
- **Resource** : practitioners build strong relationships across agencies and disciplines to ensure they support and protect the children with whom they work
- **Include** : practitioners recognise the differences between, and are confident to respond to, circumstances where children experience adversity due to economic and social circumstances and acute family stress, and situations where children face harm due to parental abuse and neglect.

- **Mutual challenge** : practitioners challenge themselves and each other, question each other's assumptions, and seek to resolve differences of opinion in a restorative and respectful way

The three safeguarding partners (the Local Authority, a clinical commissioning group and the chief of police) should enable all schools (including multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in the new safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on how best to achieve the active engagement of individual institutions in a meaningful way. In Nottingham City we recognise the role of education and therefore have an Education Subgroup who feed in to the Nottingham City Safeguarding Children Safeguarding Partnership.

If named as a relevant agency, schools and colleges, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.

Governing bodies and proprietors should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners.

Schools and college should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

NSPCC guidance : "When to call the police" is designed to help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

#### iv. The staff

All staff, teaching and non-teaching, volunteers and others working in school need to:

- Read and understand Part 1 of Keeping Children Safe in Education 2024
- Be aware that to safeguard children, they have a duty to share information with the designated leads, and through the designated lead, with other agencies
- Be aware that despite the requirement to share information with designated leads they can make their own referral to Children's Social Care, e.g. In urgent situations.
- Be alert to signs and symptoms of harm and abuse. Further information regarding potential indicators of abuse, including specific information about risks such as Female Genital Mutilation and Forced Marriage is available on the Nottingham City Safeguarding Partners webpage
- Know how to respond to their duty when they have concerns or when a pupil discloses to them and to act
- Know how to record concerns and what additional information may be required
- Undergo child safeguarding training which is updated regularly in line with advice from the Nottingham City Safeguarding Partners, (whole staff training every three years) and statutory guidance (KCSIE, 2024)
- Recognise that abuse and neglect can happen in any setting and maintain an attitude of 'it could happen here'
- Familiarise themselves with "What to do if you're worried that a child is being abused:

Advice for practitioners' guidance." (2015)

- Report where they see or suspect that unacceptable content is being accessed online despite filtering and monitoring systems
- Ensure appropriate supervision when children are accessing online platforms

- Give due consideration to planned lesson content where it may impact the schools filtering and monitoring process, See E-safety policy for further information.
- Staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these pupils are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation. Staff will monitor pupils that are absent from school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, and in accordance with the school Attendance Policy.

### **Reporting concerns to the designated leads**

Any concern should be discussed in the first instance with *one of the designated*, as soon as possible. **If at any point, there is a risk of immediate serious harm to a child, a referral should be made to City MASH or the police immediately. Anybody can make such a referral.**

**All concerns / decisions / actions / outcomes are recorded as per school procedures (including electronic records)**

### **Immediate response to the pupil**

It is vital that our actions do not harm the pupil further or prejudice further enquiries, for example:

- Listen to the pupil, if you are shocked by what is being said, try not to show it
- It is ok to observe bruises but not to ask a pupil to remove their clothing to observe them
- If a disclosure is made,
- Accept what the pupil says
- Stay calm, the pace should be dictated by the pupil without them being pressed for detail by asking leading questions such as "what did s/he do next?" It is your role to listen – not to investigate
- Use open questions such as "is there anything else you want to tell me?" Or "yes?" Or "and?"



- Be careful not to burden the pupil with guilt by asking questions like “why didn’t you tell me before?”
- Acknowledge how hard it was for the pupil to tell you
- Do not criticise the perpetrator, the pupil might have a relationship with them
- Do not promise confidentiality, reassure the pupil that they have done the right thing, explain whom you will have to tell (the designated lead) and why; and, depending on the pupil’s age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as “I’ll stay with you all the time” or “it will be all right now”.

## Recording information

- Make some brief notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern, facts and not assumption or interpretation. Your name and role should be included.
- If it is observation of bruising or an injury try to record detail, e.g. “right arm above elbow”. Do not take photographs.
- Note the non-verbal behaviour and the key words in the language used by the pupil (try not to translate into ‘proper terms’).
- It is important to write up these original notes on the appropriate template and pass them on to the designated member of staff.
- All verbal conversations should be promptly recorded using the TBAC system.

## Supporting pupils

- The staff and Directors recognise that a child or young person who is abused or witnesses’ violence may find it difficult to develop and

maintain a sense of self-worth. Children who are impacted by Domestic Abuse are victims in their own right. We recognise that in these circumstances pupils might feel helpless and humiliated, and that they might feel self-blame.

- We recognise that any child may benefit from early help. As noted on page 10 of Keeping Children Safe in Education 2024, all staff should be particularly alert to the potential need for early help for a child who :

- is disabled
- has special educational needs
- has a mental health need
- is a young carer
- is showing signs of being drawn in to antisocial 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 school
- 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 or alcohol misuse, adult mental health issues and domestic violence
- is misusing alcohol or other drugs themselves
- is at risk of so called "honour" based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

- We recognise that this school might provide the only stability in the lives of pupils who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a pupil in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn.
- Staff have an understanding that pupils with SEND can be more vulnerable to abuse and neglect. SEND pupils will receive support from the Inclusion Lead (SENCo) and relevant outside agencies e.g Learning support or Education and Health Care Plan (Keeping Children Safe in Education 2024)
- We are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where staff have concerns about a child's mental health immediate action should be taken in line with safeguarding policy. (Keeping Children Safe in Education 2024 Page 16 and Page 17 Paragraphs 43-45).
- The centre will support all pupils by discussing child protection cases with due regard to safeguarding the pupil and his or her family; supporting individuals who are, or are thought to be, in need or at risk in line with Nottingham City Safeguarding Partners procedures; encouraging self-esteem and self-assertiveness; challenging and not condoning aggression, bullying or discriminatory behaviour; promoting a caring, safe and positive environment.
- We recognise that the provision of the right help at the right time is a key element of our wider safeguarding responsibilities. This includes the provision of Early Help either directly through the school or by signposting to other local services, as set out in Nottingham City's Threshold of Need. Where a child is receiving early help support, we will continue to monitor this to make sure it is having the required impact. Where there is no evidence of this impact we will consider other alternatives, which may include seeking specialist support.

## Confidentiality

- The personal information about all pupils' families is regarded by those who work in this school as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality
- Staff understand that they need know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The designated leads will disclose information about a pupil to other members of staff on a need-to-know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family and the consequent actions.

Staff must be aware that:

- They cannot promise a pupil complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the pupil or other pupils safe
- Where there are concerns about a pupil's welfare relevant agencies need to be involved at an early stage with consent from the parents/carers where this does not compromise the safety of the child or cause further risk. If a member of staff or a volunteer has concerns about a pupil's welfare, or if a pupil discloses that he/she is suffering abuse or reveals information that gives grounds for concern, the member of staff must speak to their designated lead with a view to passing on the information.

## Consent

All professionals are expected to follow consent guidance from the General Data Protection Regulation (GDPR) 2017, the Children Act 1989 and the Crime and Disorder Act 1998. To make a referral, parents/carers must give their

**explicit and informed consent** for information to be shared with other agencies to enable holistic support and access to services. Recorded consent should be gained by the referring agency with clarity about why and with whom information will be shared. Services cannot accept a referral without consent, unless there are safeguarding concerns whereby there is a statutory duty to intervene and seeking consent may put the child at further risk or cause a delay. In situations where there are concerns that a child is suffering, or is likely to suffer significant harm, information may be shared without consent.

Circumstances may include :

- Suspicion that a child will be forced in to marriage or removed from the country against their will
- Suspicion that a child is at risk of female genital mutilation
- A disclosure of sexual or physical abuse putting the child at immediate risk
- Suspicion that illness is being fabricated.

Permission to share information with the City MASH should always be sought from an adult with parental responsibility for the child/young person before passing information about them to Children's Social Care, UNLESS seeking permission would place the child at immediate risk of significant harm or may lead to the loss of evidence, for example destroying evidence of a crime or influencing a child about a disclosure made.

The Data Protection Act 2018 and 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. (Keeping Children Safe in Education 2024, page 19 paragraph 55)

Further details on information sharing can be found : Working Together to Safeguard Children 2023, Data Protection : toolkit for schools, Information

Sharing : Advice for Practitioners providing safeguarding services to Children, Young People, Parents and Carers.

## V. Pupils

### Safe Environment – pupils are safe and feel safe

All pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

School adopts an open and accepting attitude towards pupils as part of our responsibility for pastoral care. Pupils, parents and staff will be free to talk about any concerns and will see the school as a safe place when there are difficulties. Pupils' worries and fears will be taken seriously, and pupils encouraged to seek help from school staff.

School will therefore ensure that:

- There is an ethos where pupils feel secure and are encouraged to talk and are listened to, taken seriously, and responded to appropriately
- Pupils are involved in the decision-making which affects them.
- Pupils know that there are adults in the school whom they can approach if they are worried or have difficulties and the school has well developed listening systems.
- Posters are displayed which detail contact numbers for appropriate support services and child protection helplines e.g. Nottingham City Safeguarding Partners and Childline.
- Curriculum activities and opportunities to equip pupils with the skills they need to stay safe from abuse are provided.
- There is a clear written statement of the standards of behaviour and the boundaries of appropriate behaviour expected of staff and pupils that is understood and endorsed by all. Positive and safe behaviour is encouraged among pupils and staff are alert to changes in a pupil's behaviour and recognise that challenging behaviour may be an indicator of abuse.
- Effective working relationships are established with parents and colleagues from partner agencies.

- There is an awareness that personal and family circumstances and lifestyles of some pupils lead to an increased risk of neglect and/or abuse.

## Safeguarding as part of the Curriculum

Through PSHE, ICT and other curriculum opportunities, pupils are helped to talk about their feelings, know about their rights and responsibilities, understand and respond to risks, to deal assertively with pressures and know who they can turn to for advice and help both in and out of the school and how to make a complaint.

The following areas are addressed within PHSE, ICT and in the wider curriculum:

Bullying, including cyber-bullying, peer on peer abuse and up skirting  
E safety

Road, fire and water safety

Inter-personal relationships and domestic violence

Child sexual exploitation (CSE), online and offline

Honour based violence and forced marriage

Female genital mutilation (FGM)

Radicalisation and extremism (Educate Against Hate)

This may include covering relevant issues through Relationships Education and Relationships and Sex Education (formerly known as Sex and Relationship Education), tutorials (in colleges) and/or where delivered, through Personal, Social, Health and Economic (PSHE) education. The Government has made regulations which will make the subjects of Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) mandatory from September 2020.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils are able to access the internet using their own data plan and therefore our wider curriculum and linked policies (eg mobile phone policy) ensure that pupils have an awareness and understanding of online risks.

Governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness (Keeping Children Safe in Education 2024, page 40, paragraph 143) with clear identified roles and responsibilities for all involved in this area of safeguarding.

### Working with parents/carers

- Parents and carers play an important role in protecting their children from harm.
  - In most cases, the school will discuss concerns about a pupil with the family and, where appropriate, seek their agreement to making referrals to City MASH.
  - The pupil's views will be considered in deciding whether to inform the family, particularly where the pupil is sufficiently mature to make informed judgments about the issues, and about consenting to that.
- 
- *vigilance: to have adults notice when things are troubling them*
  - *understanding and action: to understand what is happening; to be heard and understood; and to have that understanding acted upon*
  - *stability: to be able to develop an ongoing stable relationship of trust with those helping them*
  - *respect: to be treated with the expectation that they are competent rather than not*



- *information and engagement: to be informed about and involved in procedures, decisions, concerns and plans*
  - *explanation: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response*
  - *support: to be provided with support in their own right as well as a member of their family*
  - *advocacy: to be provided with advocacy to assist them in putting forward their views*
  - *protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee (Working Together to Safeguard children 2018 p 10)*
- 
- The school aims to help parents understand that the school, like all others, has a duty to safeguard and promote the welfare of all pupils. The school may need to share information and work in partnership with other agencies when there are concerns about a pupil's welfare.

## Children in Care (previously known as LAC) and Children Previously in Care

Supporting children in care and children who have been in care is a key priority for our school. We recognise that the needs of this group of children can only be effectively met when all agencies work together. To ensure we have a coordinated approach to meeting the needs of children in care who attend our school we have a designated lead, who is: Lucy Wellings.

Our designated lead for CIC will

- Attend PEP reviews

- Ensure children receive the correct provision, support and intervention and review frequently
- Work closely with the Virtual School

## Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (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. A 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.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## Prevention in the Curriculum

Keeping Children Safe in Education 2024, page 36 paragraph 130, states that preventative education is most effective in the context of a whole school or college approach that prepares pupils and students for life in modern Britain

In addition, it is expected that:

- The school recognises the importance of developing pupils' awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The PSHE programme *in each key stage* provides personal development opportunities for pupils to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils are taught to, for example:
  - safely explore their own and others' attitudes
  - recognise and manage risks in different situations and how to behave responsibly
  - Judge what kind of physical contact is acceptable and unacceptable
  - Recognise when pressure from others (including people they know) threatens their:
    - Personal safety and well-being and develop effective ways of resisting pressure
    - Including knowing when and where to get help

- Use assertiveness techniques to resist unhelpful pressure.
- How to keep safe on-line
- The risks associated with sharing indecent images of, or information about, themselves. This is something that is often referred to as Sexting. Research indicates that this is increasingly associated with concerns such as sexual exploitation. Our work in this area is based on the guidance set out in Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People.

### **Particularly Vulnerable Groups**

Some children and young people may be particularly vulnerable to abuse and harm. This includes for example privately fostered children, children with a disability, children with communication needs. Certain forms of behaviour can also increase the vulnerability of a young person such as drug or alcohol misuse. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (Nottingham City Safeguarding Partners) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm.

At TBAC we recognise that some pupils with protected characteristics may require reasonable adjustments and positive action to be taken to deal with particular disadvantages which may affect them (Keeping Children Safe in Education 2024, page 27, paragraph 87)

### **Child Sexual Exploitation**

The sexual exploitation of children and young people (CSE) under 18 is defined as that which: involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship

where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.' (Department for Education, 2012)

Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.

### ***Who is at risk?***

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face, and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.

Nottingham City Children's safeguarding Board have developed the Multi Agency Sexual Exploitation Risk Assessment Tool where there are concerns that a child may be at risk of, involved in or thought to be experiencing child sexual exploitation. It will assist in identifying indicators of sexual exploitation and then to determine what intervention, support services and disruption tactics are required. Copies are available from the DSLs.

### **Child Criminal Exploitation (County Lines)**

All staff should be aware that children can become involved in any aspect of criminal exploitation and should be able to recognise the indicators of this abuse. This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity a) in exchange for something the victim needs or wants and/or b) the financial or other advantage of the perpetrator and facilitator and/or c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. Any concerns of this nature must be reported to the DSL and external agencies as appropriate.

All staff should be aware of indicators, which may signal that 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.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance<sup>11</sup>

## Preventing Radicalisation – Keeping Children Safe in Education 2024 (Page 156-159)

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counter-terrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of, becoming radicalised. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation. Also, schools will be monitored to ensure they are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology. Referrals to Channel are for those who are susceptible rather than vulnerable to radicalisation and being at risk of being drawn in to terrorism. Consent is needed for referrals to Channel.

Statutory guidance has been published and is available here:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

If you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the Prevent Team [prevent@nottinghamshire.pnn.police.uk](mailto:prevent@nottinghamshire.pnn.police.uk) who will then contact you to discuss whether a referral should be made. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

### Honour-based Violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. 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 HBV, or already having suffered HBV.

## Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman
- Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Potential indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.



- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. Withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a mandatory duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and Children's Social Care. Although the duty does not apply in relation to at risk or suspected cases nevertheless this is still something that must be reported to social care.

[www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation](http://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation)

### **Children who Self-harm**

Staff should always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse. All such cases should be discussed with children's social care.

Even in those unusual cases where a primary age child is thought to have self-harmed it is important to recognise that this behaviour is an indicator of emotional distress, and the child will need support to address this.

### **Child on Child Abuse**

Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Up skirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; which sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals

At TBAC we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the centre's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Where this is the case, we will follow the processes set out in the policy above. In addition, we will be mindful of the fact that the pupil against whom the allegation has been made may also be vulnerable and need additional support and that their behaviour could be an indicator that they themselves are experiencing abuse or have done so.

### **Sexting**

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'

### **Sexual violence and sexual harassment between children in schools and colleges – Keeping Children Safe in Education, 2024 Pages 111-142, paragraphs 453-563**

Schools and colleges should respond to all reports and concerns of child on child (peer on peer) sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online

Sexual violence and sexual harassment can occur between two children of any age and sex. They 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and

under pressure. Governing bodies and proprietors should ensure that the school or college contributes to multiagency working in line with statutory guidance Working Together to Safeguard Children.

Any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

The NSPCC also provides free and independent advice about HSB: NSPCC Learning –Protecting children from harmful sexual behaviour and NSPCC – Harmful sexual behaviour framework

### **Neglect – Keeping Children Safe in Education, 2024 Page 11-12 Paragraph 28 and Annex A, Page 145 Paragraph 10**

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 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.

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

Nottinghamshire and Nottingham City Safeguarding Children Partnerships have adapted this toolkit which was initially developed by Jane Wiffin on behalf of Hounslow LSCB and then revised by North Somerset; to offer a 'Structured Judgement Approach' to the identification of child neglect and the tools for agencies to work in partnership with families to improve outcomes for the children and young people.

### ***Child and Young Person's Neglect Toolkit for assisting in the identification of Child Neglect V1.3 June 2022***

The Toolkit should be used in conjunction with the local Nottinghamshire and Nottingham City Pathway documents which provide guidance on

thresholds for services, and the interagency Procedures and Guidance  
[http://nottinghamshirescb.proceduresonline.com/p\\_neglect.html](http://nottinghamshirescb.proceduresonline.com/p_neglect.html).

- Nottinghamshire: Pathway to Provision  
<http://www.nottinghamshire.gov.uk/care/childrens-social-care/nottinghamshire-childrens-trust/pathway-to-provision>
- Nottingham City: Threshold of Need Multi Agency Safeguarding Children Hub (MASH) – Nottingham City Council

## Contextual safeguarding

This means that incidents and or behaviours are associated with factors outside the school or college and/or occur between children outside the school or college the designated safeguarding lead (or deputy) should be considering contextual safeguarding. This simply means assessments of children in such cases should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors and so, it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the evidence and the full context of any abuse.

## Criminal and/or Sexual Exploitation of Children

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers and Trust 'best practice' of three. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education 2023 the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - Leave school to be home educated
  - Move away from the school's location
  - Remain medically unfit beyond compulsory school age
  - Are in custody for four months or more (and will not return to school afterwards); or
  - Are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

## Professional development

The Directors recognise that all staff and volunteers who work with pupils aged up to 18 years need to have appropriate child safeguarding training that equips them to recognise and respond to pupil welfare concerns. We will ensure staff are given mandatory induction, which includes familiarisation with child safeguarding policy, part 1 of Keeping Children Safe in Education, staff behaviour policy, the designated leads in the school, their responsibilities and procedures to be followed.

Part 2 pages 52-55 of the same guidance titled "The Management of Safeguarding" specifies "Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection training at induction.

The training, including multi-agency training, in the last 3 years undertaken by staff and Directors to ensure their knowledge and skills are up to date includes:

- Introduction to Safeguarding
- Prevent
- FGM
- Domestic Abuse
- Honour based violence
- Child Sexual Exploitation
- Sexual abuse
- DSL update training

A report of the school's training needs assessment is presented to the Directors annually so that they can ensure that training is appropriately provided for all staff. This report is also shared with staff to enable them to contribute to the development of safeguarding practice in the school. A training register is kept indicating when staff and Directors have been trained and this in turn informs the *annual* report to Directors.

Safer recruitment training has been attended by:

Head of Education – Lucy Wellings

Business Manager – Caroline Murphy

## Training

Regular training and discussion within the school environment is important and should be led by the Designated Leads for safeguarding.

### Timelines for training:

- Designated Safeguarding Lead training: refreshed **every two years** (Statutory requirement).
- Children in Education – Safeguarding Update training: To be refreshed **every three years** as agreed with Nottingham City Safeguarding Partners

The above training is available through the Safeguarding in Education Service

[safeguardingineducation@nottinghamcity.gov.uk](mailto:safeguardingineducation@nottinghamcity.gov.uk)

- Whole School Refresher Training at least annually with regular in-school updates
- Safer recruitment training: Through the DfE on-line (under review) or through local training

provided by Nottingham City Council

All staff, schools and Directors should be open to new learning and keep up to date with changes made to national and local safeguarding policy, procedure and guidance including that provided by our safeguarding partners.



Schools need to evaluate and demonstrate how well they fulfil their statutory responsibilities and exercise professional judgment in Keeping Children Safe as outlined in Keeping Children Safe in Education 2024.

### **Confidentiality, sharing information and record keeping**

Information will be shared in line with GDPR.

Staff should only discuss concerns with the Designated Safeguarding Lead, Head of Provision or Directors on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Wherever possible consent will be sought to share information however where there are safeguarding concerns about a child, information will be shared with the appropriate organisations such as Pupil's Social Care. In most cases concerns will be discussed with parents and carers prior to the referral taking place unless doing so would increase risk.

TBAC's policy on confidentiality and information-sharing is available to parents and pupils on request.

### **Schools and Partnerships**

Schools invest time and other resources in partnership activity and this investment should be aimed at improving outcomes for pupils. The Local Authority actively promotes the benefits to schools of partnerships and in this case to safeguard and improve the outcomes for potentially vulnerable pupils. Examples of this are:

- **Parental E-learning (free): Child Sexual Exploitation** is a high-profile issue. Secondary schools and academies are asked to promote this e-learning with their parents and carers as it is an opportunity to improve their awareness in identifying and responding to child sexual exploitation from a preventative or early intervention perspective.  
<http://www.paceuk.info/the-problem/keep-them-safe/>

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- **Pint Size Theatre:** Secondary Schools and Academies in Nottingham can access a performance of Pintsize Theatre's 'LUVU2' production. It is an interactive play aimed at raising awareness of Child Sexual Exploitation (CSE) with young people aged 13-14 (year 9). Contact is via email [www.pintsizetheatre.co.uk](http://www.pintsizetheatre.co.uk) or Tel: 0115 8419853.
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- **NSPCC Child line Project:** (funded through the DfE) The project is free of charge to all primary schools and pupils in Years 5 & 6. Raising awareness through interactive classroom sessions with trained NSPCC staff, they come into schools, provide an assembly and workshops to raise the awareness with children about what is or is not acceptable behaviour and how and where to seek help if worried. Contact for this is through Emma Grishin NSPCC Area Child Line Coordinator email: - [EGrishin@NSPCC.org.uk](mailto:EGrishin@NSPCC.org.uk) or Tel: 0115 9258602.
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- **Further guidance**

To support the work around child protection and safeguarding, links to statutory, national and local guidance are below:

- Family Support Pathway
- <http://www.nottinghamchildrenspartnership.co.uk/family-support-pathway/>
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- Child Sexual Exploitation

- [www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guidance-for-practitioners](https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guidance-for-practitioners)
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- Female Genital Mutilation (FGM)

- [www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation](https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation)
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- Children who may have been trafficked

- <https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>
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- Criminal Exploitation

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

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- Behaviour and Discipline

- <https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools>

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- Attendance

- <https://www.gov.uk/government/publications/school-attendance>

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- Exclusions

- <https://www.gov.uk/government/publications/school-exclusion>

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- Bullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

- Nottingham City Safeguarding Partners (formerly NCSCB) Guidance Children Missing from Home and Care Joint Procedures

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- Sexting in Schools and Colleges

- Sexting in Schools and Colleges, responding to incidents and safeguarding young people – UKCCIS (2017)

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- [www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006](http://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006) (updated August 2018)

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**TBAC**  
The Learning Centre