Policy

Shaftesbury Education

September 2026

Safeguarding Children Policy

This document relates to	
Shaftesbury Education	✓

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Introduction

Shaftesbury is a disability charity offering care, education, vocational and rehab services. The charity also provides residential care, nursing and supported living.

Within the education sector, Shaftesbury has one school, Shaftesbury Victoria School, and 2 further education colleges, Shaftesbury Millie College and Shaftesbury Nash College. The school is for students aged 3-19, and the colleges are for students aged 16-25. All students have an Education, Health and Care Plan (EHCP), as well as physical and/or intellectual disabilities, and some have profound and complex learning needs.

The National Society for the Prevention of Cruelty to Children (NSPCC) Consultancy is commissioned annually review the Safeguarding Children Policy, the Safeguarding Adults Policy and the Safeguarding Reporting Procedure. This document has been produced as a result of their recommendations.

Purpose of this Policy

The purpose of this policy is:

- To provide guidance to all staff for the safeguarding and protection of children.
- To ensure a consistent approach to responding to allegations and/or concerns about the abuse or neglect of children.
- To ensure that the organisation fulfils its obligations under Keeping Children Safe in Education (KCSIE) 2026.

This policy is based on principles from the Children Act 1989, the Children and Social Work Act 2017, the Education Act 2002, and Keeping Children Safe in Education 2026 (KCSIE) guidance.

The Safeguarding Children Policy complements and should be used in conjunction with the relevant Local Authority (LA) Child Safeguarding protocol and operating procedures for the setting where the service is provided.

All staff must adhere to this policy without discretion. It applies whenever staff work with students, including all off-site activities such as visits, trips, and sporting events.

This policy also applies to all volunteers, agency and temporary staff, contractors, and visitors at Shaftesbury Education settings.

Shaftesbury also has in place a Safeguarding Adults Policy which should be used by any member of staff or volunteer who has a concern about an adult at risk with whom they come into contact with through the course of their work.

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What is Safeguarding?

'Safeguarding' is defined in KCSIE 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 children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity 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 2023).

The Children Act 1989 and amendments such as the Children and Social Work Act 2017 provide the legal framework for child protection in England. This includes local authorities, schools, and care providers. The guidance 'Working Together to Safeguard Children' highlights key practices, including early help, a child-centred approach, inter-agency cooperation, and accountability.

Section 47 of the Children Act requires local authorities to investigate if a child is suspected of significant harm, assessing their needs and family circumstances. Local Safeguarding Partnerships establish procedures that all partners follow.

At Shaftesbury, we are committed to these principles, ensuring children are protected, well-cared for, and able to thrive in a safe environment.

Safeguarding duties apply in relation to any child. A child is anyone under the age of 18.

The welfare of the child is paramount regardless of the situation - the most important consideration is whether the child is safe. If the child may be in immediate danger the police should be called.

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Policy Statement

Shaftesbury Education is dedicated to safeguarding all students, ensuring they feel secure and valued. Every student, regardless of background, has the right to protection from harm ,abuse, neglect and exploitation. We recognise the additional vulnerabilities of some children arising from their communication needs, dependency on others for personal care, and previous experiences of trauma, or other individual circumstances of abuse or neglect.

Staff play a crucial role in identifying signs of abuse. Comprehensive safeguarding training is provided during induction and regularly updated to maintain vigilance. Staff are required to follow reporting procedures and familiarise themselves with Part 1 of Keeping Children Safe in Education, which outlines key safeguarding issues.

This policy is crucial to our commitment to safeguarding and promoting the welfare of children. We work in partnership with parents and carers, multi-agency teams and departments, and our communities to continuously enhance the safeguarding culture within our schools and colleges. We work with statutory organisations to ensure that all safeguarding concerns are referred appropriately and addressed in accordance with local and national procedures and work with others to ensure reported incidents are investigated fully.

We recognise that safeguarding is everyone's responsibility.

Principles

Key principles underpinning all child safeguarding concerns are:

The welfare of the child is paramount.

- **Early help**: Providing support as soon as a problem emerges to prevent issues from escalating.to prevent issues for escalating and improving outcomes for children. This may be through community based Early Help or the targeted early help level of Family Help.
- **Child-centred approach**: Ensuring that the child's needs, wishes, feelings and lived/living experiences are at the heart of safeguarding processes.
- **Inter-agency cooperation**: Working collaboratively with other professionals and organisations to effectively safeguard children.
- **Accountability**: Ensuring that all professionals are responsible for their actions and decisions regarding child protection. Remaining vigilant, asking questions and taking action in the child's best interests.

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- **Protocols**: Following local and national protocols when responding to concerns about significant harm to a child.
- **Reporting**: Ensuring all staff follow the procedures for reporting concerns to the Designated Safeguarding Lead (DSL).
- **Trauma-informed practice**: Recognising the impact of trauma and prioritising safety and trust through tailored interventions to avoid re-traumatisation (see below).
- **Promote a Safeguarding Culture:** Creating a culture where children feel safe and are listened to.

Shaftesbury ensures that these principles are at the centre of its safeguarding practice.

Trauma Informed Practice

Trauma-informed practice develops from the understanding of how trauma exposure can affect our neurological, biological, psychological and social development. It is founded on the understanding and acceptance that symptoms and experiences related to trauma are coping strategies established by people to manage traumatic experiences. Trauma-informed practice seeks to avoid re-traumatisation by using the principles of safety, trustworthiness, choice, collaboration, empowerment and cultural consideration.

Shaftesbury recognises that trauma informed practice is an essential element of practice within safeguarding and is one which should be recognised in order to ensure that students are protected from further harm and re-traumatisation. Understanding the impact traumatic experiences have within the context of safeguarding enables Shaftesbury and other partners to tailor our interventions to the individual needs of students. The aim is to support students to develop trust and feel safe and empowered in their interactions with Shaftesbury and other agencies involved in safeguarding.

There is a natural crossover with trauma informed practice and the principles of child safeguarding. These approaches ensure that the student is at the centre of our practice and is supported to contribute to decisions about their care, support and safety planning wherever appropriate. enabled to make choices and be the expert of their own care, support and safety planning. This should be evident in Local Protocols.

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Roles and Responsibilities

Safeguarding is everyone's responsibility; every member of staff plus Trustees and members of the Local Advisory Board should:

- Protect students from abuse.
- Be aware of Shaftesbury's safeguarding policies, procedures and protocols.
- Know how to access and implement safeguarding policies.
- Follow local protocols at all times.
- Know the identity of the DSL and to whom one should speak in the absence of the DSL.
- Report all safeguarding concerns to the DSL.
- Make a record of any significant safeguarding concern, conversation or incident in line with local protocols.
- Undertake appropriate training, including refresher training every year.

In addition, some postholders have specific responsibilities as highlighted below:

Responsibilities of Shaftesbury's Trustees

The Charity Commission requires that Trustees have overall responsibility for the protection of beneficiaries and others who come into contact with the charity from harm and abuse and expects Trustees to have the requisite knowledge, skills and expertise to do so effectively and responsibly. The Trustees are supported in this by the Head of Governance. Trustees must ensure the following:

- All serious incidents are reported to the Charity Commission.
- A member of the Executive Leadership Team is designated as responsible for decision-making in response to safeguarding concerns and ensure Shaftesbury's obligations under the Prevent Duty are met.
- Safeguarding and promoting the welfare of children is embedded throughout the organisation's culture, policies, procedures and practice, and that all decisions are made in the best interests of children
- Safeguarding concerns and decision-making are overseen by suitably qualified DSLs.

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- Trustees must ensure appropriate filtering and monitoring systems are in place, regularly reviewed and documented, and that online safety is embedded within safeguarding arrangements.
- Clear structures are in place to enable staff, volunteers and visitors to report concerns.
- Incidents and allegations are logged, tracked, and monitored, with data regularly shared with management and trustees.
- Scrutiny of regular safeguarding reports and review of the effectiveness of policies, protocols, training and the management of safeguarding.
- Support is provided for staff working with individuals affected by abuse.
- Safer recruitment practices are implemented to mitigate risks from employees. See the Recruitment and Selection Policy.
- Staff receive supervision and training to identify abuse and neglect.
- A code of conduct sets standards for personal relationships for those in positions of trust.
- Accessible information guides staff and visitors on reporting concerns.
- Staff, students and visitors have easy access to information on how to voice concerns or complaints about the service, both internally and to external bodies.
- Procedures for managing allegations and low level concerns are in place.
- A whistleblowing policy supports reporting of bad practices.
- Disciplinary procedures address neglect or abuse by staff.
- Notifications are made to the Disclosure and Barring Service (DBS) when necessary.
- Safeguarding records are accurate, clear, and up-to-date.
- Service contracts and specifications align with safeguarding policies.
- A safeguarding board comprised of Trustees and Executive Directors reviews serious cases, trends, and lessons learned.
- A range of managers are involved in safeguarding decisions and are advised on learning and development opportunities from cases reviewed.
- Audits of the Sign-In Central Record (SICR) are reported to the Trustees via the Director for Education.

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The Board of Trustees has collective accountability for safeguarding. The Chair of the Safeguarding and Services Quality Committee provides oversight and assurance to the Board.

Responsibilities of the Designated Safeguarding Lead (DSL) – see job description

All settings must have a Designated Safeguarding Lead (DSL) available at all times. Typically, this role is held by a senior leader, registered manager, Deputy Head, or Head of Setting. The DSL advises, supports, and guides staff on safeguarding concerns and links with local authorities and police.

DSLs receive specialised training and meet periodically with deputies and safeguarding leads from other settings. Their responsibilities include, but are not limited to:

- Ensuring the safety of all students.
- Collating information and securing forensic evidence for concerns.
- Informing the Head of Setting and Director for Education about significant issues.
- Contacting local authorities and coordinating action plans, including police involvement if needed.
- Recording actions in the Child Protection Online Management System (CPOMS), per reporting protocols.
- Notifying regulatory bodies for Care Quality Commission (CQC) registered services within 24 hours.
- Communicating with commissioning authorities and relevant social workers.
- Contacting the police if a student's safety is at immediate risk.
- Managing referrals to LA social care, the Channel programme and DBS, as required.
- Providing support to staff and sharing knowledge and skills.
- Understanding the views of students, encouraging a culture of listening and acknowledging the difficulties students may have in approaching staff.
- Holding detailed, accurate, secure written records of all safeguarding concerns, discussions and decisions, including the rationale for decisions.
- Ensuring student safeguarding files are kept up to date and where information is shared it is line with KCSIE guidelines.

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- Promoting effective information sharing with safeguarding partners and other relevant agencies in accordance with statutory guidance and data protection legislation.
-
- Taking a lead role in online safety, including advising on filtering and monitoring arrangements and responding to safeguarding concerns arising from the use of technology.
- Maintaining awareness of emerging safeguarding risks associated with artificial intelligence, digital technologies and online platforms.

The DSL's role is described in detail in Keeping Children Safe in Education (2026) Annex B.

Responsibilities of the Head of Setting

The Head of Setting (who may be the Headteacher, Principal or Head of College) is responsible for:

- Overseeing the effectiveness of safeguarding responses, reports, action plans, and investigations
- Ensuring the DSL has the time and resources to carry out their role effectively
- Reviewing safeguarding outcomes and recommending changes to protocols and staffing if needed
- With the DSL, proposing case closures to the Education Safeguarding Team for complex cases.

What is Abuse?

All staff need to recognise the signs and indicators of abuse. While it is not always possible to be certain that abuse has occurred or is occurring, staff should report any concerns, however small, to the DSL.

KCSIE 2026 defines abuse as:

> "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

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can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by… another child or children."

In addition, staff should understand that harm can occur inside and outside school or college, inside and outside the student's home, and online. Incidents of abuse, neglect and exploitation are rarely standalone events and multiple issues can overlap.

The term "potential source of risk" may include relatives, professional staff, paid care workers, volunteers, other people who use services, neighbours, friends, associates, and strangers. It applies regardless of whether the abuse was intentional or unintentional.

We take seriously any reports of non-recent abuse, reporting concerns to the police as necessary, and cooperating with any investigation.

It is not our responsibility to decide whether or not abuse has taken place. Shaftesbury has a responsibility to inform others if we believe there is cause for concern, so that the appropriate agencies can investigate and take any necessary action to protect the individual concerned. Any suspicion, allegation or incidence of abuse must be reported to the DSL immediately, who will then decide, in consultation with others as necessary, whether to make a referral to the relevant LA Safeguarding Team. DSLs and Head of Settings should be aware of the different procedures for children and adults, as referenced in local protocols.

General indicators of abuse

Children experiencing abuse often experience more than one type of abuse over a period of time. Children who experience abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend.

Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be able to recognise the signs.

The following may be indicators of abuse:

- Seeking shelter or protection.
- Unexplained reactions towards particular individuals or settings.
- Frequent or regular visits to the general practitioner or the accident and emergency department, or hospital admissions.
- Frequent or irrational refusal to accept investigations or treatments for routine difficulties.
- Unexplained change in material circumstances.

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- Inconsistency of explanation regarding the area of possible concern.
- Carer/care worker or third party always wishing to be present at interviews.
- Anorexia/bulimia or eating disorders.
- Panic attacks, withdrawal of verbal communication, regressive behaviour.
- Disturbed sleep patterns.
- Absconding/wandering.
- Dislike of being touched and flinching on being touched.
- Obsessive or challenging behaviour.
- Self-harm.
- Withdrawal.
- History of domestic violence.
- Knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour .

Although none of the above indicators definitively suggest abuse, and these signs do not necessarily mean a child is being abused, suspicions should be heightened if one or more of these factors exist. Where children and young people experience barriers to communication and understanding, it is even more important for staff to be aware of any behavioural changes.

It is not the role of staff to decide whether or not abuse has taken, or is taking, place, but if they have any concerns they should report it to the DSL, following Shaftesbury's safeguarding procedures.

Risk factors

There are certain factors and situations that may place people at particular risk of being abused. The presence of one or more of these factors does not automatically imply that abuse will result, but may increase the likelihood:

- Physical and cognitive disabilities – for example, where a person needs assistance in managing urinary and/or faecal continence.
- Mental health issues or social isolation – experienced by the person themselves or by a member of their household.
- Dependency on family or carers, or where someone else is dependent on them.

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- Cultural and language barriers – such as differences in communication.
- Environmental factors – this could include inappropriate or dangerous physical or emotional environments (such as a lack of personal space) or a change in the lifestyle of a member of their household (for example, due to unemployment or illness).
- Previous experience of abuse, a family history of abuse, or living in the same household as a known abuser.

Types of Abuse

Physical abuse

What is physical abuse?

Physical abuse may involve assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint or restricting movement (e.g. tying someone to a chair).

Spotting the signs of physical abuse

Children often have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern.

Injuries that are more likely to indicate physical abuse include:

Bruising

- bruises on babies who are not yet crawling or walking
- bruises on the cheeks, ears, palms, arms and feet
- bruises on the back, buttocks, tummy, hips and backs of legs
- multiple bruises in clusters, usually on the upper arms or outer thighs
- bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
- large oval-shaped bite marks

Burns or scalds

- any burns which have a clear shape of an object, for example cigarette burns

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- burns to the backs of hands, feet, legs, genitals or buttocks

Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times. If someone is frequently injured, and if bruises or injuries are unexplained or the explanation does not match the injury, this should be investigated. Delays in seeking medical help for someone who has been injured should also be investigated.

Emotional / Psychological abuse

What is emotional abuse?

Emotional abuse, also known as psychological abuse, is the persistent emotional maltreatment of a person to cause severe and persistent adverse effects on their emotional wellbeing.

Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Emotional abuse involves:

- humiliating, putting down or regularly criticising someone
- shouting at or threatening someone or calling them names
- mocking someone or making them perform degrading acts
- constantly blaming or scapegoating someone for things which are not their fault
- trying to control someone's life and not recognising their individuality
- not allowing someone to have friends or develop socially
- pushing someone too hard or not recognising their limitations
- manipulating someone
- addressing a person in a patronising or infantilising way
- exposing someone to distressing events or interactions
- persistently ignoring someone
- leaving someone unattended when they need assistance
- preventing someone from meeting their religious and cultural needs
- preventing the expression of choice and opinion
- failure to respect privacy

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- preventing someone from accessing services or educational and social opportunities
- removing mobility or communication aids
- being cold and emotionally unavailable during interactions with the person
- not being positive or encouraging to the person or praising their achievements and successes.

Spotting the signs of emotional abuse

There usually are not any obvious physical signs of emotional abuse, but you may spot changes in a child's actions or emotions. Some children are naturally quiet and self-contained while others are more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development.

Babies and pre-school children who are being emotionally abused may:

- be overly-affectionate towards strangers or people they haven't known for very long
- not appear to have a close relationship with their parent, for example when being taken to or collected from nursery
- lack confidence or become wary or anxious
- be unable to play
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you would not expect for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends
- fear making mistakes
- fear their parent being approached regarding their behaviour
- self-harm

Sexual abuse

What is sexual abuse?

Sexual abuse is forcing or enticing a child to take part in sexual activities. It does not necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child. It includes:

- sexual touching of any part of the body whether the child is wearing clothes or not

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- rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
- forcing or encouraging a child to take part in sexual activity
- making a child take their clothes off or touch someone else's genitals.

Non-contact abuse involves non-touching activities. It can happen online or in person and includes:

- encouraging or forcing a child to watch or hear sexual acts
- making a child masturbate while others watch
- not taking proper measures to prevent a child being exposed to sexual activities by others
- showing pornography to a child
- making, viewing or distributing child abuse images
- allowing someone else to make, view or distribute child abuse images
- meeting a child following online sexual grooming with the intent of abusing them.

Online sexual abuse includes:

- persuading or forcing a child to send or post sexually explicit images of themselves, this is sometimes referred to as sexting
- persuading or forcing a child to take part in sexual activities via a webcam or smartphone
- having sexual conversations with a child by text or online.

Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the child's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped. Abusers will often try to build an emotional connection with the child in order to gain their trust for the purposes of sexual abuse. This is known as grooming.

Spotting the signs of sexual abuse

There may be physical signs that someone has suffered sexual abuse. These include:

- anal or vaginal soreness or itching
- bruising or bleeding near the genital area
- discomfort when walking or sitting down
- an unusual discharge

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- sexually transmitted infections (STI)
- pregnancy.

Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people or show sexual behaviour that is inappropriate for their age. For example:

- they could use sexual language or know things about sex that you would not expect
- they might become sexually active or pregnant at a young age.

Child sexual exploitation

What is child sexual exploitation?

Child sexual exploitation (CSE) is a type of sexual abuse. Young people may be coerced or groomed into exploitative situations and relationships. They may be given things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities. Young people may be tricked into believing they are in a loving, consensual relationship. They often trust their abuser and do not understand that they are being abused. They may depend on their abuser or be too scared to tell anyone what is happening. They might be invited to parties and given drugs and alcohol before being sexually exploited. They can also be groomed and exploited online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs (Berelowitz et al, 2013). Child sexual exploitation can involve violent, humiliating and degrading sexual assaults and involve multiple perpetrators.

Signs of child sexual exploitation can be very difficult to identify.

Young people who are being sexually exploited may:

- go missing from home, care or education
- be involved in abusive relationships
- hang out with groups of older people
- be involved in gangs or anti-social groups
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- be involved in petty crime such as shoplifting
- have access to drugs and alcohol
- have new things such as clothes and mobile phones, which they are not able to easily explain.

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Child Criminal Exploitation (CCE)

Child criminal exploitation is a form of child abuse where a child or young person is forced or coerced to engage in criminal activity or commit any type of crime.

Child criminal exploitation does not yet have a legal definition. It has sometimes been used interchangeably with the term 'county lines'. County lines exploitation makes up a large proportion of child criminal exploitation, but there are other forms of criminal exploitation involving children.

County lines

County lines is a form of criminal exploitation where highly organised criminal networks, often in the form of gangs, persuade, coerce or force children and young people to store or move drugs and money. Children may be forced to move drugs or money around their local area or transport them outside their local area to suburban areas, market towns and coastal towns.

It can happen in any part of the UK, is against the law and is a form of child abuse.

Carrying weapons

Children and young people might be exposed to, or forced to use, a wide variety of weapons. This includes knives, firearms and harmful sprays and liquids such as CS spray or acids.

They can sometimes be made to store weapons or transport them from one area to another. They may also carry a weapon, such as a knife, because they fear for their own personal safety.

Other forced criminal activity

Children and young people might be made to:

carry out forced home invasion or 'cuckooing' of properties as a place for the people exploiting them to undertake criminal activity

grow cannabis

steal, shoplift, pickpocket or beg as a way of making money for the person exploiting them.

Financial exploitation

This type of child criminal exploitation can involve children being coerced, threatened or manipulated into moving money for the person exploiting them. Children can be forced to hold or move money through:

physical cash

their already existing bank accounts

cryptocurrency accounts

opening a new bank account which is then controlled by the exploiter.

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Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include:

• **i**ncreased absence from school or college,

• a change in friendships or relationships with older individuals or groups,

• a significant decline in educational 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 suspended, spent time in Alternative Provision or permanently excluded from school,

• having experienced child maltreatment,

• having been involved in offending, such as theft or robbery,

• having used drugs or alcohol in early adolescence

• having previously been a victim or previously perpetrated violence

Harmful sexual behaviour

What is harmful sexual behaviour?

Harmful sexual behaviour is developmentally inappropriate sexual behaviour displayed by children and young people which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour. Harmful sexual behaviour encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as the people it is directed towards.

Harmful sexual behaviour can include:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- sexual activity with other children or adults.

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Sexual behaviour between children is considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not (Davies, 2012). However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled (Rich, 2011).

Spotting the signs of harmful sexual behaviour

It is normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation.

Neglect

What is neglect?

Neglect is not meeting a person's basic physical and/or psychological needs. This can result in serious damage to their health and/or development. Neglect may involve a parent, carer or other responsible person not:

- providing adequate food, clothing or shelter
- supervising the person or keeping them safe from harm or danger (including leaving them with unsuitable carers)
- making sure the person receives appropriate health and/or dental care
- making sure the person receives a suitable education
- meeting the person's basic emotional needs – this is known as emotional neglect

Neglect is the most common type of child abuse. Neglect often happens at the same time as other types of abuse.

Spotting the signs of neglect

Neglect can be difficult to identify. Isolated signs may not mean a person is suffering neglect, but multiple and persistent signs over time could indicate a serious problem.

Some of these signs include:

- people who appear hungry - they may not have lunch money or even try to steal food
- people who appear dirty or smelly
- people whose clothes are inadequate for the weather conditions
- children who are left alone or unsupervised for long periods or at a young age

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- people who have untreated injuries, health or dental problems
- people with poor language, communication or social skills for their stage of development
- people who live in an unsuitable home environment.

Self Neglect

What is self-neglect?

Self-neglect is a lack of self-care to an extent that it threatens personal health and safety. It can include:

- neglecting to care for one's personal hygiene, health or surroundings
- inability to avoid self-harm
- failure to seek help or access services to meet health and social care needs
- inability or unwillingness to manage one's personal affairs.

Financial or material abuse

What is financial abuse?

Financial abuse is a type of abuse which involves having money or other property stolen or misused, or being defrauded or pressured in relation to money or property. This includes:

- theft of money or possessions
- fraud
- scamming
- preventing a person from accessing their own money or possessions
- denying assistance to manage/monitor financial affairs
- false representation
- using another person's bank account, cards or documents
- exploitation of a person's money or possessions, e.g. unauthorised use of a car
- misuse of a power of attorney, deputy, appointeeship or other legal authority

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Domestic abuse

What is domestic abuse?

Domestic abuse is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. It can include the following types:

- Emotional – e.g. belittlement, isolation from friends and family, controlling where the person goes or who they talk to.
- Threats and intimidation – e.g. threats to hurt/kill, harassing or following the person.
- Physical – e.g. hitting, shoving, throwing things at the person, choking.
- Sexual – e.g. pressuring the person into having sex, touching them in a way that they do not want to be touched.
- Financial – e.g. controlling the person's use of money, not giving them enough money to survive.
- Coercion – e.g. controlling behaviours that include assault, threats, humiliation and intimidation to harm, punish or frighten someone to obtain compliance.

Exposure to domestic abuse is child abuse. Children can be directly involved in incidents of domestic abuse or they may be harmed by seeing or hearing abuse happening. Children in homes where there is domestic abuse are also at risk of other types of abuse or neglect.

Spotting the signs of domestic abuse

It can be difficult to tell if domestic abuse is happening, because abusers can act very differently when other people are around.

Those who witness domestic abuse may:

- become aggressive
- display anti-social behaviour
- suffer from depression or anxiety
- not do as well in education – due to difficulties at home or the disruption of moving to and from refuges

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Organisational or institutional abuse

What is organisational abuse?

Organisational abuse involves mistreatment, neglect or poor practice towards individuals by an organisation. It includes:

- discouraging visits or the involvement of relatives or friends
- run-down or overcrowded establishment
- authoritarian management or rigid regimes
- lack of leadership and supervision
- insufficient staff or high turnover resulting in poor quality care
- abusive and disrespectful attitudes towards people using the service
- inappropriate use of restraints
- lack of respect for dignity and privacy
- failure to manage residents with abusive behaviour
- not providing adequate food and drink or assistance with eating
- not offering choice or promoting independence
- misuse of medication
- failure to provide care with dentures, spectacles or hearing aids
- not taking account of individuals' cultural, religious or ethnic needs
- failure to respond to abuse appropriately
- interference with personal correspondence or communication
- failure to respond to complaints.

Discriminatory abuse

What is discriminatory abuse?

Discriminatory abuse is unequal treatment based on one or more 'protected characteristics'.

The Equality Act 2010 lists the following protected characteristics:

- age

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- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief
- sex or sexual orientation.

Discriminatory abuse can include:

- verbal abuse
- derogatory remarks or inappropriate use of language related to a protected characteristic
- denying access to communication aids
- not allowing access to an interpreter, signer or lip-reader
- harassment or deliberate exclusion on the grounds of a protected characteristic
- denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- substandard service provision relating to a protected characteristic.

Disability hate crime

Disability hate crime is a crime or incident motivated by hatred or prejudice towards a person because of their actual or perceived disability. This is a type of discriminatory abuse.

Bullying and cyberbullying

What are bullying and cyberbullying?

Bullying is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable.

Bullying includes:

- verbal abuse, such as name calling
- non-verbal abuse, such as hand signs or glaring

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- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic bullying
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive calls.

Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying.

Cyberbullying includes:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name

Spotting the signs of bullying and cyberbullying
It can be hard to know whether or not someone is being bullied. They might not tell anyone because they are scared the bullying will get worse. They might also think the bullying is their fault. No one sign indicates for certain that someone is being bullied, but you should look out for:

- belongings getting ‘lost’ or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school or college, being mysteriously 'ill' each morning, or skipping school or college
- not doing as well at school or college

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- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others

Child trafficking

What is child trafficking?

Child trafficking is child abuse. It involves recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another.

Children may be trafficked for:

- child sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal exploitation such as cannabis cultivation, pickpocketing, begging, transporting, drugs, selling pirated DVDs and bag theft

Children who are trafficked experience many forms of abuse and neglect. Physical, sexual and emotional abuse is often used to coerce children and they are also likely to suffer physical and emotional neglect.

Child trafficking can require a network of organised criminals who recruit, transport and exploit children and young people. Some might not be directly involved in trafficking a child but play a part in other ways, such as falsifying documents, bribery, owning or renting premises or money laundering (Europol, 2011). Child trafficking can also be organised by individuals and the children's own families.

Traffickers trick, force or persuade children to leave their homes. They use grooming techniques to gain the trust of a child, family or community. Although these are methods used by traffickers, coercion, violence or threats do not need to be proven in cases of child trafficking - a child cannot legally consent to their exploitation so child trafficking only requires evidence of movement and exploitation. Modern slavery is another term which may be used in relation to child trafficking. The Modern Slavery Act passed in 2015 in England and Wales

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categorises offences of slavery, servitude, forced or compulsory labour and human trafficking**.** For further details, please refer to the Modern Slavery and Human Trafficking Policy Statement.

Signs that a child has been trafficked may not be obvious, but you might notice unusual behaviour or events.

Children who have been trafficked may:

- have to do excessive housework chores
- rarely leave the house and have limited freedom of movement
- not have any documents (or have falsified documents)
- give a prepared story which is very similar to stories given by other children
- be unable or reluctant to give details of accommodation or personal details
- not be registered with a school or GP practice
- have a history with missing links and unexplained moves
- be cared for by adults who are not their parents or carers
- not have a good quality relationship with their adult carers
- be one among a number of unrelated children found at one address
- receive unexplained or unidentified phone calls whilst in a care placement or temporary accommodation

There are also signs that an adult is involved in child trafficking, such as:

- making multiple visa applications for different children
- acting as a guarantor for multiple visa applications for children
- having previously acted as the guarantor on visa applications for visitors who have not left the UK when the visa expired

Female genital mutilation

What is female genital mutilation?

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. The age at which FGM is carried out varies. It may be carried out when a child is new-born, during childhood or

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adolescence, just before marriage or during pregnancy. FGM is child abuse. There are no medical reasons to carry out FGM. It is dangerous and a criminal offence.

Spotting the signs of female genital mutilation

Someone at risk of FGM may not know what is going to happen. But they might talk about or you may become aware of:

- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin or an older female relative such as a mother or aunt
- missing school/college repeatedly or running away from home

Someone who has had FGM may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

Regulated health and social care professionals and teachers in England and Wales must report ‘known’ cases of FGM in under-18s to the police (Home Office, 2016).

Forced marriage

What is forced marriage?

A marriage without the consent of one or both parties. In a forced marriage one or both spouses either do not, or cannot, consent to the marriage.

The legal age to marry in England and Wales is 18. It is a crime to do anything that would mean that a child is married before their 18th birthday, even if there is no violence, threats or other forms of coercion involved. As with all laws relating to forced marriage, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.**Mental Health**

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All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, still have an important role to play. Specifically, they can support the fulfilment of 4 key roles:

• promoting good mental wellbeing and preventing the onset of mental illness,

• observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,

• ensuring early targeted support is provided

• liaison with/referral to specialist services where needed.

The Prevent Duty

Background

Shaftesbury has a duty under the Counter Terrorism and Security Act 2015 (CTSA 2015) to have due regard to the need to help prevent people from being drawn into terrorism. This duty, known as the Prevent Duty, is about safeguarding people and communities from the threat of terrorism. The duty applies to safeguarding those who may be vulnerable to being drawn into terrorism or extremist ideologies. It covers all types of extremism, whether political, religious, racial or ideological.

The Act states that authorities subject to the provisions must also have regard to the statutory guidance issued under section 29 of the Act when carrying out the duty. The guidance summarises requirements in terms of four themes: risk assessment, working in partnership, staff training and IT policies. Shaftesbury recognises that Prevent is part of its wider safeguarding duty.

The Prevent duty is consistent with existing duties, such as the requirement to abide by the Equality Act 2010, promote 'fundamental British values', secure a balanced presentation of political issues and promote community cohesion.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an

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extremist or terrorist group may appear to provide an answer. Radicalisation can occur both online and offline. Staff should be aware that social media platforms, online communities, encrypted messaging services, gaming environments and emerging technologies may be used to disseminate extremist content or facilitate radicalisation.

Although these indicators do not necessarily mean a person is being or has been radicalised, the potential signs of radicalisation include:

- Ignoring or demonising viewpoints that contradict their own.
- Expressing themselves in an 'us vs. them' manner about others who have alternative beliefs,
- Increasingly secretive or unwilling to discuss views.
- Using derogatory language.
- Changing their circle of friends.
- Losing interest in activities they once enjoyed.
- Becoming socially withdrawn or spending a lot of time online.
- Belief in conspiracy theories and distrust of mainstream media.
- Justifying the use of violence or expressing a desire for revenge.
- Being secretive about who they talk to online and which websites they visit.
- Fixation on extremist material.
- Sudden intolerance towards protected groups.
- Increased engagement with extremist online content.
- Sharing extremist symbols, propaganda or messaging.
- Expressions of admiration for terrorist acts or perpetrators.
- Susceptibility to conspiracy narratives linked to extremist ideology

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to be being drawn into terrorism. Every LA has a Channel programme which provides a source of advice - anyone can make a referral.

Any concerns that a child may be vulnerable to radicalisation or extremism should be reported to the DSL following the school's procedures.

Protecting the people who use our services from the risk of radicalisation

Shaftesbury is compliant with the most recent Prevent Duty guidance: Prevent duty guidance - GOV.UK

The duty to protect people who use our services from the risk of radicalisation is seen as a part of the wider safeguarding duties of Shaftesbury's education centers, similar to the

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responsibility to protect students from harm caused by, for example, drugs, gangs, neglect or sexual exploitation.

Shaftesbury recognises the potential vulnerability of many of those we work with in our other services. For this reason, as well as specific training for staff within our education services, all Shaftesbury staff receive appropriate training on radicalisation. Prevent awareness training is provided for members of staff, volunteers and Local Advisory Board (LAB) members.

As with managing other safeguarding risks, staff should be alert to changes in behavior which could indicate that those we work with may be in need of help or protection. Staff, in liaison with the DSL should use their professional judgement in identifying anyone who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Our school and colleges promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. They have clear protocols for ensuring that any visitors and visiting speakers are suitable and appropriately supervised at our settings. DSLs and Prevent leads undertake awareness training to support them in identifying those at risk of being drawn into terrorism and to challenge extremist ideas. Procedures are kept under review in order that amendments can be made as required as a result of changes in the regulations and/or external guidance.

All students at a Shaftesbury Education setting have a completed Prevent Risk Assessment in place.

Shaftesbury Education's Prevent Leads triage Prevent cases and take appropriate action as required.

Refer to the Shaftesbury Education Prevent Duty Policy for more detail on risk assessments, training, use of external speakers and other measures relating to Prevent.

Online Safety

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

Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact – being subjected to harmful online interaction with other users, or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and

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adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increase the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g.) consensual and non-consensual sharing of nudes and semi-nudes), sharing other explicit images, including those generated by AI and online bullying.

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

To manage risk and safeguard students from potentially harmful and inappropriate online material we:

- Ensure filtering and monitoring systems are in place on all devices and networks.
- Ensure the DSL and safeguarding teams understand their responsibilities around online safety, know what filtering systems are in place and are notified of all monitoring alerts.
- Ensure filtering systems are robust and appropriate without unreasonably impacting teaching and learning.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff receive regular training updates.
- Ensure staff are aware of the expectations and restrictions around the use of mobile phones and smart technology and social media usage.
- Teach students about online safety as part of the curriculum, for example safe use of the internet, social media and technology, how to recognise unacceptable behaviour online, how to recognise and report incidents of cyber-bullying.
- Inform parents and carers about online safety and how to report any concerns.

All students should have an online safety risk assessment conducted as part of their annual "keeping me safe" review. This document provides a summary score and should be used to establish risk.

A safeguarding referral should be made in accordance with the Directorate Online Safety Policy.

For further information about online safety, please refer to our Online Safety Policy.

Mobile Phone Policy

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Attendance and Safeguarding

Shaftesbury Education is committed to ensuring the safety and wellbeing of all students, including those who may be missing from education. We recognise that prolonged or repeated absence from school or college can indicate safeguarding concerns. Regular monitoring of attendance records can help identify patterns of absence.

Refer to the Student Attendance Policy and Procedure.

Contextual Safeguarding

The British Association of Social Workers (BASW) defines contextual safeguarding as "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 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 in a range of social contexts."[1]

Contextual safeguarding is an important part of safeguarding children, and Shaftesbury Education works with local authorities and other agencies in the community as required.

What to do when you have a Concern or a Child discloses Abuse or Neglect

Action to be taken by everyone

The following action should be taken by anyone who has concerns about the welfare of a child. Staff should not assume a concern will be reported by a colleague or another professional.

[1] Contextual Safeguarding | BASW

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NON-ACTION IS NOT AN OPTION.

Actions:

Step 1: Make sure everyone is safe now. If they aren't, take immediate action to make them safe; this may include calling the police (see Step 3).

Step 2: If a disclosure is being made, you should:

- React calmly so as not to frighten or alarm the student. Listen to what they have to say and allow the pace of the conversation to be dictated by the student.
- Tell them they were right to tell and acknowledge how hard it was for them to tell you.
- Tell them that they are not to blame.
- Take what they say seriously.
- Reassure them that the information will be treated with respect but that you are required as part your job to report it (to the DSL) to ensure that the student can be helped to stay safe and feel better.
- Ask only questions which will clarify the nature of the allegation. Questions should be neutral, such as "can you tell me what happened?". Avoid interviewing them or asking explicit details of the allegation as this may hinder a police enquiry.
- Note carefully any clearly visible external signs of possible injury or neglect.
- Preserve any forensic evidence i.e. the scene of the incident, place of entry/exit to the room/building, clothing, person's body etc.

If a disclosure is being made, you should **not**:

- Burden the student with guilt by asking questions such as "why didn't you tell me before?"
- Interrogate or pressure the student to provide information.
- Ask any potentially leading questions such as those that start with the words, how, when, where and why.
- Undress the student or examine clothed parts of the student's body in an attempt to determine the nature of any such injuries/neglect.
- Criticise the perpetrator; this may be someone the student loves.
- Promise confidentiality.
- Make promises that you cannot keep such as "I'll stay with you all the time" or "it will be alright now".

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Step 3: Report the concern to the DSL or another member of the Safeguarding Team, using the reporting method specified in your setting's Local Safeguarding Protocol – unless this person is part of the allegation. If this person dismisses the concern you should contact their next line manager (See Shaftesbury Whistle-blowing policy).

All settings display a safeguarding poster identifying the DSL and other members of the Safeguarding Team. All members of staff have a duty of care to ensure that they speak to a DSL or member of the Safeguarding Team about their concerns.

If the student wants to call the police immediately and they need support to do so, this should be provided by the DSL or Head of Setting. In line with local protocol, the Head of Setting and DSL must be informed prior to a call taking place.

Step 4: Write up a factual account of what you've been told and what you've done, using the reporting method specified in your setting's Local Safeguarding Protocol.

- Record the date, time, place and context of the disclosure or concern, and what has actually been said, not assumption or interpretation. Accounts must be signed and dated.
- Clearly distinguish between fact, observation, allegation and opinion.
- Record observed injuries and bruises on a body map.
- Note the non-verbal behaviour and the key words in the language used by the student (do not translate into "proper terms").
- Appreciate that your records may be used in criminal proceedings or disciplinary investigations.

Any concerns about students must be discussed with or referred to the DSL as soon as possible and at the latest by the end of the session the concern occurred in.

Local protocols may have different reporting arrangements. Shaftesbury Education requires all staff to read and sigh the Local Safeguarding Protocol for the setting they are employed in alongside this document.

Do not underestimate the effects and impact on you. Make sure you speak to a manager or the People Team about how you are feeling. They will make sure you know where to go to get support and that you know who you can talk to if needed.

Remember:

- It is not the job of the person who raises the concern to decide if abuse has taken place. Do not put off taking action.
- Do not leave it to someone else to help the person at risk and do not assume that someone else will report the concern.

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- Do not be afraid to voice your concern – the person at risk may need urgent safeguarding.
- Do not promise not to tell. This could make you an accessory to abuse.
- Do not begin your own investigation.

Action to be taken by the Designated Safeguarding Lead (DSL)

Usually initial actions must start as soon as a safeguarding concern has been raised.

Actions:

Step 1: Make sure everyone is safe now. If they aren't, take immediate action to make them safe; this may include calling the police (see Steps 3 and 4).

Step 2: Check all required actions have been completed by the person raising the concern and collate all relevant information. Ensure any forensic evidence is secured.

Step 3: Inform the Head of Setting and Director for Education for all issues greater than minor, including if 'out of hours'. Where the disclosure relates to actual abuse or the suspicion of abuse, the DSL will report the disclosure to the Head of Setting, Director for Education and Children's Social Care within 24 hours. The DSL may discuss the concern with the Head of Setting and/or Director for Education, or take advice from Children's Social Care, before deciding whether to make a referral.

For minor issues ensure all appropriate actions are taken in line with Safeguarding Reporting Procedure and Local Protocol.

If the student wants to call the police immediately you must support their decision to do so. However, it is better if we contact the police once we have talked the issue through with the relevant LA Safeguarding Team / Children's Social Care (see Local Protocol).

Step 4: If a police contact is required contact the relevant LA Safeguarding Team (see Local Protocol) and agree on an immediate plan, including communicating with police if appropriate, and who will contact family members, the potential source of risk and other people who use our services and staff.

REMEMBER – Everyone is entitled to the protection of the law and access to justice. Behaviour which amounts to abuse and neglect, for example physical or sexual assault, psychological abuse or hate crime, willful neglect, unlawful imprisonment, theft and fraud and certain forms of discrimination also often constitute specific criminal offences under various pieces of legislation. Although the LA has the lead role in making enquiries, where criminal

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activity is suspected, the early involvement of the police is likely to have benefits in many cases.

Step 5: Follow any agreements for immediate action made with the LA Safeguarding Team.

Step 6: Ensure actions taken are recorded within CPOMS in line with Safeguarding Reporting Procedure.

Step 7: All matters reported to the LA must be reported to the Director for Education and any guidance given should be followed.

Step 8: All CQC registered services MUST:

- Inform the regulatory body within 24 hours on the standard notification forms.
- Inform social worker/care manager of commissioning or sponsoring authority.

DO NOT:

- put off taking action.
- leave it to someone else to help the student at risk.
- be afraid to voice your concern as the student at risk may need urgent safeguarding.
- promise not to tell. This could make you an accessory to abuse.
- begin your own investigation.

Action to be taken by the Registered Manager

(This may be the same person as the DSL above[2])

Actions:

Step 1: Make sure everyone is safe now. If they aren't, take immediate action to make them safe.

Step 2: Confirm immediate facts – establish what happened and ensure all immediate actions required have been completed by the person raising the concern and/or the DSL as required.

Step 3: In conjunction with the DSL commence the fact finding process**.**

Step 4: Assess need to suspend potential source of risk (if staff member)

[2] Shaftesbury Education settings with CQC registration may appoint a Registered Manager who is also the DSL.

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Step 5: In conjunction with the DSL, produce and implement action plan – ensure local protocols for use of Cause for Concern and CPOMS are used.

Step 6: Ensure the person reporting the concern and where relevant, the student at risk and their parents/carers are informed of action taken and kept up to date throughout the process.

DO NOT:

- put off taking action.
- leave it to someone else to help the student at risk.
- be afraid to voice your concern – the student at risk may need urgent protection.
- promise not to tell. This could make you an accessory to abuse. Where the fact finding process identifies opportunities for learning and improving service quality the registered manager is also responsible for proposing changes to operational policies and procedures, service design or staffing arrangements identified as a result of investigations.

Action to be taken by the Head of Setting

Actions:

- Monitor the effectiveness of DSL's responses, fact finding reports, action plans and investigations into safeguarding concerns across their setting.
- Review responses, fact finding reports, action plans and investigations to all safeguarding concerns across their setting.
- Propose changes to local operational protocols and procedures, structure design or staffing arrangements identified as a result of investigations.
- Recommend closure of cases to the Education Safeguarding Forum, chaired by the Directorate Safeguarding Lead.

Escalation procedures

When staff report concerns about a student it is reasonable to expect the DSL to respond within a specified time frame to say what action has been taken. If staff have not heard back from the DSL they can ask again after the specified time period for feedback has elapsed. In the event that a member of staff does not agree with the action taken, they can escalate the concern to the Head of Setting.

If the DSL is not satisfied with, or disagrees with, the decision made by Children's Social Care, they can challenge this through further discussion with the social work team or raise it formally

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through the professional disagreement procedure which can be found on the Local Safeguarding Partnership website. The DSL can also escalate the case to the Director for Education.

Consent

Parental consent

The decision to make a referral which could activate a child protection investigation, and the issue of gaining parental consent, are serious matters and require careful judgement. These decisions must only be taken by the Head of Setting or DSL, who will liaise with the Head of Setting as appropriate, following consultation as appropriate with Children's Social Care.

The consent of parents should be obtained before making a formal referral, unless to do so could place the child at risk of significant harm. Information relating to safeguarding can be shared without consent in accordance with the Information Commissioner's Office (ICO) guidance.

Any decision to make a referral and the rationale relating to sharing information with or without consent should be recorded.

Medication Administration Incidents

The administration of medication places great responsibility on us as a provider of high-quality services, and shortfalls can lead to serious risk of harm. Therefore, Shaftesbury Education requires that all medication administration incidents and errors are reported immediately to the DSL, recorded on CPOMS in line with safeguarding procedures and local protocols, and notified to the Director for Education for all incidents above minor.

As with all safeguarding, there is the dual aim of ensuring further harm is mitigated and that learning improves our practice. To enable us to do this, we need to undertake 'fact finding' and lessons learnt procedures that align with the medication administration process.

Completion of reporting will require the use of the Incident Decision Tree to determine the likely root cause and the appropriate outcomes. These outcomes will be recorded on the reporting form, on CPOMS, and through monthly KPI with monitoring to completion.

Refer to the Medication Administration Policy and Procedure for more detail.

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Supporting a Person who makes Repeated Allegations

A person who makes repeated allegations that have been looked into and are unfounded should be treated without prejudice:

- Each allegation must be risk assessed and reviewed to establish if there is new information that requires action under these procedures.
- A risk assessment must be undertaken and recorded and measures taken to protect staff and others, where appropriate.
- Each incident must be recorded as an alert and entered onto the safeguarding database by the DSL.
- The DSL should ensure that the individual circumstances are discussed with the person's social worker and the plan of action agreed, recorded as part of the individual care plan and shared with all relevant parties.
- It is recognised that someone who makes repeated allegations may be in need of safeguarding.

When the Person Causing Harm has Care and Support Needs

In cases where the potential source of risk is another person (adult or child) with care and support needs, the agency responsible for their care must be informed. This would be done by the DSL contacting their social worker or case manager. The individual may need an assessment – e.g. health or care, behaviour, mental health, MCA or Deprivation of Liberty Safeguards (DoLS) – in their own right to establish whether they require additional specialist services. They may also be entitled to the support of an IMCA if they lack mental capacity.

Allegations against Staff

All Shaftesbury Education staff and volunteers are expected to follow the Code of Conduct which outlines expected standards of behaviour and conduct. Staff should also adhere to the guidelines on personal and professional conduct set out in Part 2 of the Teachers' standards – Gov.UK as well as the school/college's policies.

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Any student making an allegation against a member of staff will be treated sensitively and made to feel safe and listened to. If there are any immediate safety concerns, action must be taken to remove the student from harm.

Managing allegations against staff

It is acknowledged that a parent, student, or another staff member may raise an allegation against a member of staff, including volunteers and supply staff. If an allegation is made:

- The staff member receiving the allegation must promptly inform the Head of Setting or the most senior DSL within the Senior Leadership Team if the Head is unavailable. If the allegation involves the DSL or Head of Setting, the Director for Education must be contacted for guidance.
- The Head of Setting or DSL will discuss the allegation with the Local Authority Designated Officer (LADO) for Children's Safeguarding.
- In situations occurring outside regular office hours, contact details provided within each setting should be used.

Settings are required to follow local authority procedures outlined in the LADO protocol for managing allegations against staff, along with statutory guidance from KCSIE.

Possible lines of investigation into an allegation include LA safeguarding services making enquiries and assessing whether an adult needs support, and disciplinary procedures being activated.

If an allegation is made that a staff member or volunteer has:

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

then this should be reported immediately to the police or Children's Social Care.

If police involvement is necessary, whenever possible, the Head of Setting or DSL should liaise with the police before communicating with the member of staff who is the subject of the allegation.

Actions taken must align with Shaftesbury's disciplinary procedures and employment law. The employee has the right to be informed, in broad terms, that concerns or allegations have been raised about them. Individuals subject to allegations should be informed promptly. However,

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maintaining confidentiality is essential, in compliance with reporting restrictions set by the Education Act 2011.

It is important that accurate records are kept of allegations, actions taken, advice received and the response.

Consideration should also be given to how students are supported through the process, as well as the member of staff involved.

Suspension of the staff member under scrutiny requires careful deliberation, and consultation with the LADO for Adult Safeguarding and the Shaftesbury People Team.

If the staff member resigns from their post or refuses to cooperate with the process, this would not prevent an allegation being followed up.

'Settlement agreements' (where a person agrees to resign and the employer agrees not to pursue disciplinary action) are **not** used in cases of alleged abuse.

Duty to refer

Shaftesbury Education has a legal duty to refer anyone who has harmed or might have been at risk of harming a child to the DBS, regardless of whether the person was dismissed, moved roles, or left of their own accord.

Investigation outcomes

KCSIE defines possible outcomes of allegations as:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person who is the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Where a safeguarding investigation outcome/disciplinary process determines that a teacher is unsuitable to work with children their name will be reported to the Teaching Regulation Agency, with advice and support from the People Team and Director for Education and LADO

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where appropriate. This will be conducted in accordance with Barring Regulations and Shaftesbury's disciplinary procedures.

Reportable conduct includes:

- Unacceptable professional conduct, including serious breaches of the Teachers' Standards (e.g. dishonesty, misuse of social media, inappropriate relationships)
- Conduct that may bring the profession into disrepute
- Conviction of a relevant criminal offence, especially involving violence, dishonesty, sexual misconduct, or safeguarding
- Serious safeguarding failures, including:
    - Abuse of trust
    - Failure to follow safeguarding procedures
    - Failure to protect students from risk of harm

If an allegation against a member of staff is substantiated, action will be taken in line with the Managing Allegations against Staff Policy – action may include:

- considering any factors that may have contributed to or failed to prevent abuse occurring
- reviewing safeguarding and child protection measures to ensure ongoing vigilance
- making changes to organisational policies and procedures as necessary.

Staff Conduct

Safer working practice

All staff are expected to follow the Shaftesbury Staff Code of Conduct and follow guidance and local protocols around professional boundaries and physical contact.

Staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for staff working with individual students to do so in view of other staff. If staff anticipate being in a situation that could be open to misinterpretation they should alert a senior leader in advance and inform the student's parent or carer.

Staff should escort students of the same sex to the toilet but are not expected to be involved with personal care, unless the student has an additional need and a care plan has been agreed in writing.

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We recognise that physical touch between staff and students in relation to the activity being provided is acceptable in public places; however, this will be carefully risk assessed and agreed with the Senior Leadership Team.

Low-level concerns

At Shaftesbury Education, we promote an open and transparent safeguarding culture. Staff are encouraged to report any concerns - even if no more than a 'nagging doubt' – about the behaviour, conduct or attitudes of a staff member, volunteer or contractor working in or on behalf of the setting.

KCSIE refers to 'low-level concerns' as any concerns or allegations which do not meet the threshold set out at paragraph 432 of KCSIE. This does not mean the concern is insignificant. The person may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

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

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared with the DSL, recorded and dealt with promptly and appropriately.

Confidential records should be kept of all low-level concerns, including the nature of the concern and action taken. A review can indicate if there are emerging patterns.

Whistleblowing

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.

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All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in relation to students. Please refer to the Whistleblowing and Raising Concerns Policy.

Staff Training

All staff will receive face to face training on safeguarding as part of their induction.

All staff will receive face to face refresher safeguarding training at least annually with a particular focus on recognising signs of abuse, managing a disclosure as well as recapping monitoring and reporting procedures of abuse and suspected abuse. In addition, staff will receive regular training updates about safeguarding related issues.

Online safeguarding training will also be used as refresher training.

Every member of staff is required to sign to confirm that they have read and understood: the Safeguarding Adults Policy, Safeguarding Children Policy, Safeguarding Reporting Procedure, Local Safeguarding Protocol, Staff Code of Conduct and KCSIE Part One.

The safeguarding training of third-party staff/contractors is verified and, if necessary, further training may be given as part of the induction process. Third-party colleagues also sign the Staff Code of Conduct.

Training records are regularly reviewed. Local Safeguarding Protocols detail the measures in place to manage staff who have missed training.

Staff competency in responding to safeguarding concerns are monitored on an ongoing basis and additional training provided as required. Should a student or a member of staff be concerned about another member of staff's conduct in relation to safeguarding then procedures are put in place.

Specific training is provided for DSLs. DSLs keep up to date on safeguarding through local and national networks and cascade relevant information to all staff.

Safer Recruitment

Shaftesbury Education recognises that sometimes people who want to cause harm to children actively seek employment that provides them access to children. Settings will protect our students by thorough and rigorous scrutiny of all applications. We will implement the charity's Safer Recruitment Policy which requires our Education settings to:

- Verify the applicant's identity

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- Check qualifications, experience, employment history
- Check applicant's health and physical capacity to undertake the job in accordance with equality legislation and where appropriate to fitness to undertake the role
- Hold a face-to-face interview for all candidates with at least one member of the panel who has attended safer recruitment training.
- Ensure all adults in regulated activity with students have been DBS checked and barred list checked.
- Where an applicant has lived or worked overseas criminal record checks will be obtained where available, Translations of original documents must be verified.
- Carry out an online search of shortlisted candidates as part of due diligence
- Make staff aware of their contractual, legal, administrative and pastoral responsibilities. A key document to support staff's understanding in this area is KCSIE which is made available to all staff.
- All pre employment checks will be recorded on the school's SCR.

Following appointment, all staff will receive safeguarding training and support as part of their induction. Training will be updated annually and is regularly reviewed to ensure expectations are being met.

In recruiting and appointing staff, the Head of Setting and People Team have key responsibilities to create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse students.

Refer to the Recruitment and Selection Policy for more information.

Recording Information

It is very important that all concerns are properly recorded whether the local authority are involved or not. Records of concerns may reveal patterns, which may indicate abuse or identify unmet needs. Poor record keeping is regularly identified as one of the main safeguarding challenges, which can put Shaftesbury and its students at risk.

Staff should follow these guidelines when recording safeguarding information:

- Records should be only as long as necessary and written in everyday plain English without abbreviations.
- Certain information may not be available to you. Do not pursue the questioning of the person for this information if it is not given freely. Consult any files or documentation

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Shaftesbury may have for these details. Do not delay reporting the matter by waiting for all the information.

- It is important to stick to the facts. However, your opinion may be crucial, but ensure that it is recorded as an opinion and that you can state evidence to support your thinking. Records pertaining to issues of safeguarding may be accessible to third parties, such as local authorities, police, the courts and solicitors.
- All safeguarding incidents, concerns and allegations should be recorded using local setting protocols. This includes the use of CPOMS. The details of any action and outcome of a safeguarding enquiry is confidential to the individual concerned and professionals who need to know. However, it is appropriate to expect a level of feedback. This may be from the DSL or local authority, which tells you that action has been taken, and that the person is okay and safe.
- Copies of all records relating to safeguarding issues must be kept securely. All documents should be uploaded to the documents section in CPOMS.

Sharing Information

Notifying parents/carers

The setting will normally seek to discuss any concerns about a student with their parents or carers. However, staff should not discuss concerns with parents or carers directly and should always consult with the DSL and follow advice from the DSL. Concerns must be handled sensitively and the DSL will make contact with the parent or carer in the event of a concern, suspicion or disclosure. However, if the setting believes that notifying parents or carers could increase the risk to the student or exacerbate the problem, then advice will first be sought from Children's Social Care. Consideration will be given as to how to maintain a good working relationship with parents and carers when there are safeguarding concerns.

Referrals

The decision to make a referral which could activate a safeguarding investigation, is a serious matter and requires careful judgement. These decisions must only be taken by the Head of Setting or by the DSL, who will liaise with the Head of Setting as appropriate, following consultation as appropriate with Children's Social Care.

Where the disclosure relates to actual abuse or the suspicion of abuse, the DSL will report the disclosure to Children's Social Care within 24 hours.

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In the event of the setting making a referral to Children's Social Care, they should agree with the recipient of the referral what exactly the student and their parents and/or carers will be told, by whom and when. The DSL should ask to be kept informed of the timing of the strategy discussion between Children's Social Care and the police, which will decide whether and how to investigate. The DSL should be prepared to contribute to the strategy discussion.

Children's Social Care are required to acknowledge written referrals within one working day. If the setting has not heard from Children's Social Care after two working days it will make contact again. A record of each contact with Children's Social Care, including the name(s) of the officer spoken to, should be kept.

Confidentiality and sharing information

REMEMBER – *Sharing information about safeguarding should not be delayed because of concerns about confidentiality – safeguarding always overrides confidentiality.*

Nonetheless, all staff should understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the student(s) and staff involved, but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, Deputy DSL, Head of Setting, Director of Education or Safeguarding Trustee (depending on who is the subject of the concern). That person will then decide who else needs to have the information and will disseminate it on a 'need-to-know' basis.

Safeguarding information will be stored and handled in line with General Data Protection Regulation (GDPR), 2018 principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights secure.

Records of referral forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store safeguarding information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Safeguarding

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information will be stored separately from the student's school/college file and the school/college file will be 'tagged' to indicate that separate information is held.

Safeguarding records are normally exempt from the disclosure provisions of GDPR, which means that students and their parents or carers do not have an automatic right to see them. If any member of staff receives a request from a student or parent/carer to see safeguarding records, they should refer the request to the Head of Setting.

GDPR principles do not prevent settings from sharing information with relevant agencies, where that information may help to protect a student. When information is shared, the reason for doing so as well as the reasons why consent may not have been sought, will be clearly documented within the safeguarding records.

When a student leaves the setting, their safeguarding files will be copied, with the copies archived and stored securely for 7 years and the original securely packaged and transferred by hand to the new setting. A signed document acknowledging receipt of the record will be requested from the new setting.

Guidance from the ICO can be found here: Data sharing | ICO

Toilets

Schools must not allow children into toilets designated for the opposite biological sex. This includes where schools are responding to requests to support social transition for children who are questioning their gender.

Schools must provide separate toilets for boys and girls aged 8 and over, apart from where a mixed-sex toilet is in a room intended for use by one pupil at a time and is lockable from the inside. Schools should assess the safeguarding risks of mixed-sex toilets and plan accordingly.

If a gender-questioning child does not want to use the toilet designated for their biological sex, schools should consider whether they can provide an alternative toilet facility, without compromising single-sex toilet provision. Schools should keep a clear record of these situations, communicate them appropriately and review them regularly. Changing rooms and showers • Schools must not allow a child aged 11 years or older at the start of the school year to undress in front of a child of the opposite biological sex.

Schools must provide suitable changing accommodation and showers for pupils who are aged 11 years or older at the start of the school year, considering age, numbers, sex and any special requirements they may have.

When responding to a request to support social transition, schools must not allow a child to access changing rooms designated for the opposite sex.

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If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, schools should consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. This could be achieved by using a separate fully enclosed room or by using existing facilities at separate times. Schools should keep a clear record of these situations, communicate them appropriately and review them regularly.

Children who are questioning their gender

Schools should take time to understand the thoughts and feelings of children who are questioning their gender and be professionally curious about the child's experiences, including potential vulnerabilities. Schools should consider adopting policies that maintain flexibility and avoid rigid rules based on gender stereotypes.

Considering requests for support with social transition

Members of staff should not adopt any changes relating to social transition unless a decision has been made by the school following involvement from the child's parents or carers.

Schools should make sure that the decision-making process around requests for support with social transition is documented and records are kept.

Schools should consider whether pupils would be best supported by a policy on social transition which explains the steps the school would take.

Schools and colleges have statutory duties to safeguard and promote the welfare of all children

As a first step when considering a request for support with social transition, schools should consider what is in the best interests of the child and other children.

In most cases, this would be carried out in conjunction with the child's parents or carers, with referral to clinical evidence and advice where relevant.

Parents and carers should be actively involved and their views treated with importance

The views of the child's parents or carers should be properly considered. In circumstances where involving parents or carers would put the child at a greater risk than not involving them, the school should involve the DSL to determine what action should be taken.

Schools should explore how best to support conversations with parents and carers, including offering for a staff member to be present or speak to parents and carers on the child's behalf.

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In cases where a child speaks to a staff member about their feelings but does not ask the school to make any changes around support with social transition, there is no reason to share this information any further unless there is a related safeguarding risk.

Accommodating social transition is an active intervention so schools and colleges should take a very careful approach

Schools should take a very careful approach in relation to social transition. The Cass Review acknowledged that there is a lack of good evidence on the long term impact of social transition on young people.

Primary schools should exercise particular caution, and the guidance expects support for full social transition in these settings to be agreed very rarely. The Cass Review acknowledges that older children will generally have greater agency to make their own decisions.

Schools should comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

Where a policy may place a child who is questioning their gender at a disadvantage relative to other children, schools should consider the following:

- does the policy have a legitimate aim (such as safeguarding or fairness in sport)?
- is the policy a proportionate means of achieving that legitimate aim?

Discussing constraints on social transition

Schools should sensitively discuss any constraints to social transitioning, highlighting that supporting social transitioning does not include allowing access to toilets, changing rooms or residential accommodation designated for the opposite sex.

Schools must be conscious of the rights of pupils and staff in relation to their religion or belief.

Reviews

Schools and colleges are legally required to record a child's biological sex accurately wherever it is recorded. Schools should make sure that all relevant staff are aware of a child's biological sex.

Children living in stealth

Schools should keep in mind that some children who socially transition before puberty will be 'living in stealth,' meaning other pupils and/or staff may be unaware of their biological sex.

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Schools should be aware of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth. Support for children who wish to detransition

In circumstances where a child wants to fully or partially reverse a request that has been previously agreed, schools should work closely with parents or carers and relevant experts to make sure that children in this position are supported.

Duty of Candour

On 1 April 2015, the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 extended a new duty of candour, to all service providers of regulated activities.

The duty of candour requires Shaftesbury to act in an open and transparent way in relation to care and treatment provided to our students. This duty applies to our dealings with students, and the people who act on the behalf of students who lack capacity.

The duty means that, as soon as reasonably practicable, after becoming aware that a safeguarding incident has occurred which meets the 'notifiable safety incident' criteria, either the 'registered person' or the Head of Setting must notify the 'relevant person' that the incident has occurred, and provide reasonable support to them in relation to the incident.

'Notifiable safety incident' is a specific term defined in the duty of candour regulation as an incident that meets all three of the following criteria:

- It must have been unintended or unexpected.
- It must have occurred during the provision of an activity we regulate.
- In the reasonable opinion of a healthcare professional, it already has, or might, result in death, or severe or moderate harm to the person receiving care. This element varies slightly depending on the type of provider.

If any of these three criteria are not met, it is not a notifiable safety incident (although the overarching duty of candour, to be open and transparent, always applies).

The 'registered person' is the person responsible for carrying out, or delegating the responsibility for carrying out, the duty and must liaise with the 'relevant person'.

The 'relevant person' is the student or the person acting on the behalf of students who lack capacity regarding decisions relating to their overall care or treatment and how/where it is managed.

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REMEMBER – *All safeguarding concerns, regardless of whether the duty of candour applies, should be reported under the safeguarding procedure as set out in the Shaftesbury Education Safeguarding Reporting Procedure and the local setting's Safeguarding Protocol.*

The policy - Communication with Relatives, Advocates, Friends and Carers - provides specific guidance on how incidents should be communicated to meet the Duty of Candour.

Reflections and Lessons Learnt

All safeguarding cases above 'minor' will be followed by the debriefing and lessons learnt process – see the Debriefing Policy and Procedure.

Implementation

Each LA has its own safeguarding procedure. Every setting has its own Local Safeguarding Protocol. Every setting has a copy of the procedure for their LA area referenced in the protocol for their setting. The LA safeguarding team will provide DSLs and setting leaders with advice and guidance about the application of our safeguarding policies and procedures to ensure they meet local requirements.

Shaftesbury Education ensures that managers and staff are able to carry out the requirements of this policy by:

- Being trained and competent in line with best practice.
- Being informed of relevant sources of support and information.
- Having a clear understanding of what constitutes poor practice, the implications of poor practice and benefits of good practice.
- Being supported by other staff and managers, and with necessary resources.
- Monitoring staff competency in the application of this procedure and acting appropriately to respond to any shortfalls.
- Completing periodic refresher briefings on the content of safeguarding policies and procedures.
- Ensuring briefings and training for all new staff as part of induction.
- Ensuring regular audits of the application of the procedure – by checking and monitoring mechanisms including record keeping, against the standards set out in the procedure.

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- Displaying the safeguarding poster – see Appendix B - in all workplaces.
- Ensuring that managers and staff are aware of the potential signs of abuse, and that they know what to do to raise a concern. This will be monitored as part of the Shaftesbury quality process through periodic checks, audits and direct staff questioning.
- Reviewing data on safeguarding concerns raised and responses to concerns through the safeguarding forum and Trustee safeguarding board.

Related Policies, Procedures and Protocols

This procedure should be read in conjunction with the following documents.

- Shaftesbury Education Safeguarding Adults Policy
- Shaftesbury Education Safeguarding Reporting Procedure
- Setting-specific Local Safeguarding Protocols
- Location-specific LA safeguarding procedures
- Shaftesbury Safeguarding Children in an Adult setting Policy
- Shaftesbury Education Prevent Duty Policy
- Shaftesbury Education Online Safety Policy
- Individual Online Safety and Prevent Risk Assessments
- Shaftesbury Whistleblowing and Raising Concerns Policy
- Shaftesbury Mental Capacity Act Policy and Procedure
- Shaftesbury Lone Working Policy
- Shaftesbury Disciplinary Policy
- Shaftesbury Education Recruitment and Selection Policy
- Shaftesbury Education Student Attendance Policy
- Shaftesbury Education Positive Behaviour Support Policy
- Shaftesbury Education Managing Allegations Against Staff Policy

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- Shaftesbury Staff Code of Conduct
- Shaftesbury Education Physical Intervention Procedure
- Shaftesbury Education Physical Touch Procedure
- Shaftesbury Intimate Care and Clinical Tasks Policy
- Shaftesbury Education Relationships and Sex Education Policy

The above policies and procedures are located on the Shaftesbury intranet: 7net – Shaftesbury Intranet

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Policy Ownership

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Safeguarding Children Policy	2.0

Date published	Date for next review
September 2026	September 2027

Approved by	Date
Shaftesbury Safeguarding & Services Quality Committee	8th September 2026

History	Date	Author	Reason
4.5	September 2022	Jane Percy	Annual review
4.6	September 2023	Jane Percy	Annual review
1.0	November 2025	Adele Audin	New Education Version
2.0	September 2026	Adele Audin	Updated with NSPCC review

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Appendix A – Safeguarding Levels Criteria

Appendix A - Safeguarding Levels Criteria

Link: **Safeguarding Types of Abuse Severity Matrix**

Appendix B – Safeguarding Posters

Appendix B1 – Safeguarding Poster template

Link: **Safeguarding Poster**

Appendix B2 – Local Safeguarding Posters

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Shaftesbury Millie College:

SAFEGUARDING

Shaftesbury Millie College

If you witness or suspect harm, or have a concern, you must:

ACT IMMEDIATELY and speak to one of the following Designated Safeguarding Leads below within **one hour**:

Geoff Lively
Deputy Principal
Designated Safeguarding Lead DSL

Emma Browning
Pastoral & Wellbeing Lead
Deputy Designated Safeguarding Lead

Rebecca Burgess
MDT Lead
Deputy Designated Safeguarding Lead

Mike Gamble
Assistant Principal
Deputy Designated Safeguarding Lead

If you see or hear something that:	If you witness a member of Staff:
• Concerns you that a young person may be at risk • Makes you feel uneasy or worried about a young person • Suggests something is not right, even if you are unsure • Raises a concern about a young person's safety or wellbeing	• Behaving in a way that has harmed or may harm a young person • Possibly committing a criminal offence against or relating to a young person • Behaving in a way towards a young person in a manner that suggests they are unsuitable to work with young people
Speak to a member of the **Safeguarding Team** within **one hour**. **Record** your concern onto **CPOMS or Cause for Concern form** (the safeguarding team member will direct you to the correct recording system)	

For further information and contacts Safeguarding policy documents can be found on our website and in our safeguarding stations

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Shaftesbury Nash College:

Shaftesbury Nash College

COLLEGE SAFEGUARDING

REPORT ANY CONCERNS ABOUT A STUDENT'S WELFARE TO A SAFEGUARDING OFFICER

Mo Obadare
x203 or 07803 623457
Head of People & Student Welfare;
Designated Safeguarding Lead

Kristal Nicholson
07834 176829
Pastoral Support Team Lead;
Deputy Designated
Safeguarding Lead

Martin Bentham
x299 or 07885 687910
Head of College

If you have a concern about a college student you must speak to a member of this team IMMEDIATELY.
If you are unable to get hold of anyone from this team, please contact Adele Audin, Shaftesbury Safeguarding contact, on 07976584290.

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Shaftesbury Victoria School:

PRINT DATE: 11.09.26 KCSIE 2026 VERSION

Safeguarding

Victoria School Shaftesbury

If you witness or suspect harm, or have a concern, you **MUST: ACT IMMEDIATELY** and speak to one of the following:

Designated Safeguarding Leads

Daniel Pitt
(DSL)
SLT Corridor
Ext: 266
M: 07889 154 303

Victoria Pudney
(DSL)
SLT Corridor
Ext: 262
M: 07889 154 308

Jake Line
(DSL)
Carmel House
Ext: 290
M: 07525 807 664

Deputy Designated Safeguarding Leads

Sean Mogg
(Deputy DSL)
Carmel House
Ext: 221
M: 07889 154 310

Gemma Mallett
(Deputy DSL)
Behind Reception
Ext: 296
M: 07889 154 326

Nikki Nabney
(Deputy DSL)
Nurses' Office
Ext: 226
M: 07889 154 324

Olu' Odunsi
(Deputy DSL)
Headteacher
Ext: 291
M: 07925 357825

- **Everyone should have access to CPOMS.** If there are any issues, **speak to a member of the Safeguarding Team.**
- If you are unsure whether to report something on CPOMS, **speak to a member of the Safeguarding Team**
- Do not confront or report anything to the person you suspect; this could prejudice any enquiry that may follow.
- If you are unable to access CPOMS, use a *Cause for Concern* Form and **hand it to a member of the Safeguarding Team within 1 hour of the concern being raised**
- If staffing levels are a concern at a particular point in the day, use the orange NurseCall Button (see image)
- Call for assistance on channel **3** on a radio or call Reception on Ext: **200**
- If the person you suspect is on the above list or close to someone on the list, go straight to the next person named. If your concerns relate to the above team or leadership of safeguarding within the school, please contact:

Adele Audin – Director of Education: 020 8315 4800/aaudin@shaftesburygroup.org

BCP Children's First Response Hub: 01202 123334 BCP Adults' Social Care: 01202 123654

BCP Local Authority Designated Officer (LADO): 01202 817600 NSPCC: 0808 800 5000

If you witness a member of staff

- behaving in a way that has harmed or may harm a child
- possibly committing a criminal offence against or relating to a child
- behaving in a way towards a child in a manner that suggests she/he is unsuitable to work with children:

Report this immediately to the Headteacher/Principal or appropriate alternative route, and to the LADO where relevant.

Ensure safety of child → File a cause for concern through a Cause for Concern Form → Inform your DSL or line manager immediately → Be assured that your concern is being taken seriously

Safeguarding is everyone's responsibility. Always be professionally curious.

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