

Child protection and safeguarding policy

(including safer recruitment, allegations against staff and low-level concerns)

Issue Date: September 2023

This policy is reviewed at least annually .

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Deputy Safeguarding Lead: Julie Phillips

Statement of Intent:

Connect2Education Ltd is committed to providing a safe and secure environment for children, staff and visitors and promoting a climate where children and adults feel confident about sharing any concerns they may have about their own safety, or the well-being of others.

Connect2Education will safeguard and promote the welfare of children by: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes.

The Designated Safeguarding Lead is required to take responsibility for child protection issues for students who are under the care of Connect2Education Ltd and ensure the company's safeguarding policy is adhered to. All systems, processes and policies are operating with the best interests of children and young people at the core of each one.

In line with updated guidance Legislation and statutory guidance this policy is based on the Department for Education's (DfE's) [statutory guidance Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#)

We comply with this guidance and the arrangements agreed and published by local safeguarding partners: schools, Local Authorities and LADO in each local authority we work with.

This policy is also based on the following legislation:

Regarding our work with schools and local authorities, in respect of Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils. Further, we adhere to The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment guidance.

In addition

- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

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Safeguarding children is everyone's responsibility regardless of role.

1. Policy aims:

The purpose of this policy is to:

- Identify the names of responsible persons in Connect2Education and their role regarding the safeguarding of children and young people in the Stokesley centre and/or whilst working within an outreach capacity.
- Provide an overview of what should be done if a staff member in the centre or a tutor on outreach tuition has a concern about the safety and welfare of a child or young person.
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of staff safeguarding training.
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff.
- Identify senior person responsible for filtering and monitoring of internet systems within the centre at Connect2Education
- Set out roles and responsibilities for all core and contracted staff regarding safeguarding of children in respect of online safety including filtering and monitoring on computers within Connect2Education centre and whilst tutoring children and young people in schools and homes.
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g., volunteers, designated carers and contractors.
- Outline how complaints against staff will be handled.
- Set out expectations regarding record keeping
- Outline how the implementation of this policy will be monitored.

Notes on use of the terms, victims, and alleged perpetrator(s)

- For the purposes of this policy, in places, the term 'victim' is used. It is a widely recognised and understood term. It is important that it is recognised that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with

which the individual child is most comfortable.

- For the purpose of this policy, in places, the terms 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)' are used. These are widely used and recognised terms. However, schools and colleges should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.

Connect2Education staff will follow the procedures set out in this policy, in conjunction with the Child Protection/Safeguarding policy of the school where the student is on roll and where needful, follow the protocols of the Safeguarding Children Board of the Local Authority within which the school is based, or the child resides.

All staff will

- Read and understand part 1 and annex B of the Department for Education (DfE) statutory safeguarding guidance, [Keeping Children Safe in Education](#) and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communication with parent and carers. This includes making parents and carers aware of how we reduce harms from exposure to unsuitable material from the internet and safeguard children and young people in the centre when using information and technology.
- Undertake training in online safety, which includes the expectation, applicable roles, and responsibilities in relation to filtering and monitoring of online sites and interactions.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

In addition, Connect2Education will ensure we

- Ensure we have a designated senior person for child protection who has received appropriate training and support for this role.
- Ensure every member of staff knows the names of all designated senior persons responsible for child protection and their role.
- Ensure all staff understand their responsibilities in being alert to the signs of abuse and for referring any concerns to the designated teacher responsible for child protection.
- Notify social services if there is an unexplained absence of more than one day of a young person who is on the child protection register or subject to a Child Protection Plan.
- Develop effective links with relevant agencies and cooperate as required with

their enquiries regarding child protection matters.

- Ensure all records are kept secure.
- Ensure safe recruitment practices are always followed.
- Work with all parties, commissioner, and relevant safeguarding bodies, to ensure that child protection processes are followed, in a confidential manner, where there is a significant concern about a young person.
- Follow due procedure where an allegation is made against a member of staff or volunteer.

2. Children Absent from Education

Due to the nature of the work undertaken by Connect2Education, we are often commissioned by schools and local authorities to work with children who may have been absent from education for prolonged periods of time. Staff are fully aware of their responsibilities in reporting attendance to tuition sessions which may take place in the home environment as part of a package of re-engagement in education. Each session taught is reported to schools for attendance purposes; staff are trained to ensure that they report any safeguarding concerns directly to the school and to Connect2Education Designated Safeguarding Leads at the time the concern is noted.

Furthermore, staff are trained to report instantly any child or young person who is absent from an agreed a tuition session. Staff understand the importance of raising concerns over absence as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. To this end, Connect2Education are a pivotal aspect of communication regarding absence or missing from tuition sessions with schools and local authorities, social workers and other agencies. Connect2Education work closely with local authorities to ensure that real time information is logged with the relevant professionals. Connect2Education follows guidance on school attendance [‘Working together to improve school attendance’](#) specifically with regard to updating information and keeping of registers to track and monitor attendance in addition to daily reports to school attendance systems as agreed.

3. Disclosures

If a young person alleges abuse or neglect to a member of staff, Connect2Education staff will operate according to the following guidelines:

- Listen to the child or young person.
- Respect the person’s point of view
- Do not question the child or young person.
- When the clarification of information is necessary, **do not** use leading questions. Allow the young person to write down any information or use some other form of communication, if this makes the young person feel more comfortable.
- Be honest about our responsibilities and explain what we do.
- Staff do not promise confidentiality.
- We operate a zero tolerance approach to abuse
- Immediately report to the Designated Safeguarding Lead at Connect2Education, or if in a school/academy, their identified Designated Safeguarding Lead.
- Keep written records of the events, conversations and observations which led to

the concerns being made and all actions taken.

- Date and sign all reports.
- It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. All abuse is unacceptable and will be taken seriously. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to [local authority children's social care](#).

4. A young person whose name is placed on the Child Protection Register:

Must be monitored closely.

Must have any further concerns reported to the Connect2Education, Designated Safeguarding Lead.

Must have reports, verbal or written, given to the Connect2Education, Designated Safeguarding Lead, or if in school, their Designated Safeguarding Lead.

Continued Support for the young person:

Liaison with other agencies that support the young person, such as safeguarding leads, social care, Child and Mental Health Services, educational welfare services and educational psychology service, must be ongoing.

Confidentiality

We recognise that all matters relating to child protection are confidential. However, a member of staff must never guarantee confidentiality to a young person, nor should they agree to keep a secret. Where there is a child protection concern it must be passed immediately to the Designated Safeguarding Lead. Referrals to Social Care must be made as soon as possible, at least within one working day of the concern being noticed. The Connect2Education, Designated Safeguarding Lead will disclose personal information about the young person, including the level of involvement of other agencies, to other members of staff on a 'need to know' basis, following advice and guidance from: school safeguarding lead and/or social care, or CAMHS (Child and Adolescent Mental Health Service)

Responsibilities and action points:

All staff working at Connect 2 Education Ltd (including visiting staff, contractors, or volunteers) are required to report instances of actual or suspected child abuse, or neglect, to the Designated Safeguarding Lead.

The Designated Safeguarding Lead at Connect2Education is also the first point of contact for external agencies that are pursuing Child Protection investigations for children or young people, who are connected to our service.

If a child is in immediate danger, or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Anyone can make a referral.

5. Filtering and monitoring of computer systems at Connect2Education Ltd

Connect2Education Ltd will ensure staff provide children and young people with a safe environment in which to learn. To this end staff are trained to do all they reasonably can to limit children's exposure to the risks from internet usage whilst in the centre as part of their access to tuition. As part of this process, the Directors have checked and updated appropriate filtering and monitoring systems on the computers in centre and review their effectiveness each term. All staff understand that no child or young person will be left on their own with a computer; students will be monitored at all times with the staff member 'side by side' with any student who requires access to a computer, this includes word processing and use for any video materials required. Access to internet use is strictly limited and full monitored by the staff member teaching the child or young person.

The computers available for use in the centre are managed by the Directors of Connect2Education Ltd who

- review filtering and monitoring provision on a termly basis or sooner if required.
- ensure staff are trained and systems in place to block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs of the children and young people who attend the centre for tuition.

6. Abuse and neglect.

All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Specifically in relation to children and young people who are referred to Connect2Education, staff are trained to notice that additional barriers can exist whilst recognising abuse and neglect in children with special educational needs and disabilities (SEND)

Indicators of abuse and neglect

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

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause

severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Cyberbullying can involve the exploitation or corruption of children. (See DfE advice:)

[Preventing & Tackling Bullying - Advice](#)

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

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

Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

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

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Below are some safeguarding issues all staff should be aware of.

7. Child-on-child abuse.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos¹¹ (also known as sexting or youth produced sexual imagery)

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

[Sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people](#)

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

8. Child-on-child sexual violence and sexual harassment

What schools and colleges should be aware of

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

group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. Schools and colleges should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should **never** be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Whilst **any** report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Sexual violence.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003: -

<https://www.legislation.gov.uk/ukpga/2003/42/contents>

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g., to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Sexual harassment.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we

reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive, or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos, or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of under18s is a criminal offence.

[Sharing Nudes & Semi Nudes - Advice for Education Settings working with Children & Young People](#) provides detailed advice for schools and colleges.

- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

9. Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "**harmful sexual behaviour**" (HSB). The term has been widely adopted in child protection and is used in this advice. **HSB can occur online and/or face-to-face and can also occur simultaneously between the two.** HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

It is effective safeguarding practice for the designated safeguarding lead (and their

deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting, and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

HSB **can**, in some cases, progress on a continuum. Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

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

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

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

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

- appear with unexplained gifts, money, or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

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

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

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

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Child Criminal Exploitation (CCE).

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

11. Domestic Abuse

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

detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

12. Operation Encompass

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

13. So-called ‘honour’-based abuse (including Female Genital Mutilation and Forced Marriage) So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often

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

Actions If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see below).

Female Genital Mutilation (FGM).

Whilst **all** staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** personally report this to the police.

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

FGM mandatory reporting duty for teachers

Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

[Mandatory-reporting-of-female-genital-mutilation-procedural-information](#)

Any teacher who either:

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

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

Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual

evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

14. Illegal Marriage

This is an update from February 2023 in the law which states that a child can not be married before their 18th Birthday even if violence threats or another form of coercion is not used. As with the existing forced marriage law, this applies to non-binding, unofficial marriages as well as legal marriage.

15. Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency statutory guidance for dealing with forced marriage, which can be found at, The right to choose: government guidance on forced marriage [The-right-to-choose-government-guidance-on-forced-marriage.](#)

16. Mental Health.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

17. Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

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

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

- being male

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

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698009/serious-violence-strategy.pdf

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

The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence:

<https://youthendowmentfund.org.uk/toolkit/>

18. County lines

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

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

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

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

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

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

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. [criminal-exploitation-of-children-and-vulnerable-adults-county-lines](#)

19. Preventing Radicalisation.

Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be part of a schools or colleges safeguarding approach. Any child or young person can be affected by grooming.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised. Further information and a list of such indicators can be found at Radicalisation and Extremism - Examples and Behavioural Traits (educateagainsthate.com)

<https://educateagainsthate.com/radicalisation-and-extremism/>

The Prevent duty

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

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

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

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

Channel

Channel is a voluntary, confidential support programme which focuses on providing

support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

20. VEMT (Vulnerable Exploited Missing Trafficked): Victims of sexual exploitation are often unaware that they are being exploited. This type of abuse could happen to any child or young person from any background. The signs you should look out for (in a child or young person) are as follows:

- Spending a lot of time associating with an older person away from the home
- Secretive mobile phone or computer use – sometimes at unsociable hours, regularly missing from school and not taking part in education.
- Missing for long periods of time and/or coming home late
- Suffering from sexually transmitted infections
- Appearing to have new unexplained gifts
- Showing inappropriate sexual behaviour
- Mood swings or emotionally upset
- Chatting online with strangers
- Changes in eating patterns
- Misusing alcohol or drugs

Vulnerable children & young people: All children are vulnerable however particular vigilance will be exercised in respect of pupils who are subject to Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker. If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care. In a school or academy, this will be a Designated Teacher. We acknowledge that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. We are aware that additional **barriers** can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children **with SEN** and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs. In addition, we are aware that some children have an increased **risk of abuse both offline and online**. Due to the nature of our work we are acutely aware of pupils who are absent or frequently absent from education **for prolonged periods** and/or **repeat occasions** and maintain daily contact with schools to this effect regarding attendance reporting.

21. Bullying: Connect2Education Ltd and staff, have a strong commitment to an anti-bullying ethos and will consider all coercive acts and child on child abuse, within a Child Protection context. We recognise that some pupils will sometimes negatively

affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the Connect2Education [Behaviour Policy](#) if in Centre, or referred to the child's school if behaviours are noted during outreach tuition in a school approved venue such as a library or a Sure Start Centre.

As an alternative education provider, we aim to minimise the risk of allegations of bullying against pupils, by providing developmentally appropriate PSHE lessons, which help children and young people to develop an understanding of acceptable behaviour and how to keep themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed, and valued.

22. Students and families with additional vulnerabilities/multiple needs:

Connect2Education Ltd and staff acknowledge the additional need for support and protection of children who are vulnerable by virtue of: homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those with mental health difficulties or with parents with poor mental health, those with a parent or carer in prison, those subject to private fostering arrangements, those who are young carers, mid-year admissions, pupils who are excluded from school, children missing from education and pupils where English is an additional language (particularly very young children) when an appropriate translation service should be used, if necessary.

23. Reporting concerns

What should I do if I have concerns, in regard to any of the above? All concerns should be reported to the Designated Safeguarding Lead for Connect2Education or the Deputy Safeguarding Lead. You may be asked to fill in a Safeguarding form for clarification.

You can find further information from the government website here:

[What to do if you're worried a child is being abused.pdf](#)

Links to additional advice and support on all the above vulnerabilities, are available in:
[Keeping Children Safe in Education, September 2023](#)

Training: Training on safeguarding issues will be delivered as and when deemed necessary but at least on an annual basis. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All newly recruited staff (teaching and non-teaching) will be appraised of this policy and expected to sign a declaration confirming that the document has been read and understood, they will also be required to attend training. In addition, all new staff and temporary staff will need to attend an induction session with the Designated Safeguarding Lead prior to their first day in the business.

24. Safer Recruitment

Recruitment: Connect2Education Ltd is committed to the principles of Safer Recruitment, with a member of the SLT having NSPCC Certification. As part of this commitment C2E adopts recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed, and all staff recruited to Connect2Education will be subject to appropriate identity, qualification, and health checks. In addition, as part of the shortlisting process, Connect2Education may consider

carrying out a general **online search** as part of our due diligence on shortlisted candidates. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare "Disqualification under the Childcare Act 2006", which also contains information about 'disqualification by association'.
(Updated August 2018)

Volunteers: Any parent or other person/organisation engaged by Connect2Education to work in a voluntary capacity with children or young people will be subject to all reasonable vetting procedures and Criminal Records Checks.

Under no circumstances will a volunteer, in respect of whom no checks have been obtained, be left unsupervised or allowed to work in **regulated activity**.

<https://www.gov.uk/government/publications/new-disclosure-and-barring-services>

Definition of 'regulated activity': regulated activity refers to certain roles that involve working with children or vulnerable adults, such as teaching and providing care. Anyone who is on the Disclosure and Barring Service (DBS) barred lists cannot work in these roles. Volunteers who, on an unsupervised basis, teach or look after children regularly, or provide personal care on a one-off basis on our Connect2Education site/in centre, are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity.

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain a DBS certificate for volunteers who are not in regulated activity and who are supervised regularly and on an ongoing day to day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment.

Further information on checks on volunteers can be found in Part three, 'Safer Recruitment', of the DfE guidance "Keeping children safe in education". Volunteers will be subject to the same code of conduct as paid employees of the school.

Carers: Any paid carer or other person/organisation engaged by an outside agency or school/residential placement to work in a supporting capacity, or where there is a risk assessment in place which requires their attendance to sessions in the Connect2Education Centre, will be subject to all reasonable vetting procedures and Criminal Records Checks.

25. Staff Code of Conduct for Connect2Education Ltd:

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families.

The Teachers' Standards 2019: (updated December 2021)

<https://www.gov.uk/government/publications/teachers-standards>

state that all teachers, including Head Teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions, or rewards are allowed outside of those detailed in the school's Behaviour Management Policy. [Behaviour Policy Connect2Education](#)

Except in cases of emergency, first aid will only be administered by qualified First Aiders.

If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present.

Connect2Education staff should also be alert to the possible risks that might arise from social contact with pupils outside of work.

- Home visits to pupils, or private tuition of pupils, should only take place with the knowledge and approval of the Safeguarding Leads at Connect2Education and the student's school.
- If required, Connect2Education staff will only use the schools, or approved venues digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head of Centre or Library.
- Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils, nor will staff and will not store images at home.
- Staff should be aware of Connect2Education's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the Safeguarding Leads.

Contractors: It is Connect2Education's policy, that under no circumstances will we allow a contractor, in respect of whom no checks have been obtained, to work unsupervised, or engage in regulated activity. We will determine the appropriate level of supervision depending on the circumstances. We will always check the identity of contractors (and their staff) and visitors upon arrival at the centre and any person visiting, such as a social worker.

Complaints and Allegations made against staff; including volunteers:

Connect2Education Ltd ensures that it has created a safe working environment where children, young people and staff feel comfortable to discuss matters in relation to other members of staff. Connect2Education Ltd takes seriously all complaints made against members of staff and there is a Whistleblowing Policy in place.

All such complaints should be brought immediately to the attention of the Designated Safeguarding Lead and Chief Executive Officer. In cases where the Safeguarding Lead, Deputy Safeguarding Lead, or the Director, is the subject of the allegation or concern, they will be reported to the person not subject to the allegation or concern, in order that they may activate the appropriate procedures.

In the case of allegations made against all of the above, or in regard to allegations that may meet the harms threshold, the Local Authority Designated Officer (LADO) will be contacted.

The LADO will provide advice and guidance to schools and colleges when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Where it is thought best that an independent body investigate an allegation, Connect2Education employ the services of an HR/personnel company:

MBHR Consulting Limited: [MBHR Consulting Middlesbrough](#)

See also Connect2Education [Complaints Policy](#)

Below is a summary of some of the main points in; **'Keeping Children Safe in Education; Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers, and contractors.**

For detailed information, refer to this section Annex A

Where staff feel unable to raise an issue with their employer or feel that their

genuine safeguarding concerns are not being addressed NSPCC whistleblowing advice line is available. Staff can call 0800028 0285 – 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Section one: Concerns or allegations that may meet the harm threshold

This part of the guidance is about managing cases of concerns/allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This part of the guidance should be followed where it is alleged that any teacher or member of Connect2Education staff, or anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child - the designated safeguarding lead (or a deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content, and context of the allegation, and agree a course of action.

C2E has a duty of care to their employees. When an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. Consequently, a member of the SLT will act as liaison person for the member of staff

Allegation outcomes

The definitions that should be used when schools and colleges determine the outcome of an allegation are set out below:

- 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 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, or
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Suspension:

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college, until the allegation is resolved

26. Section Two: Low Level Concerns or allegations that do not meet the harm threshold

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the 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 children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

C2E wish to create and embed a culture of openness, trust, and transparency in which our values and expected behaviours are constantly lived, monitored, and reinforced by all staff. We aim to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

C2E will

- ensure their staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- empower staff to share any low-level safeguarding concerns.
- address unprofessional behaviour and support the individual to correct it at an early stage; • provide a responsive, sensitive, and proportionate handling of such concerns when they are raised; and,
- help identify any weakness in our safeguarding system. **Recording incidents.** Brief and accurate written notes will be kept of all incidents and child protection or child in need concerns relating to individual pupils. Records should include:
 - a clear and comprehensive summary of the concern.
 - details of how the concern was followed up and resolved.
 - a note of any action taken, decisions reached and the outcome.

These notes are significant, especially if the incident or the concern does not lead to a referral to other agencies. All contact with parents and external agencies will be logged and these will be kept on file in a locked cabinet in the education centre for Connect2Education Ltd.

Child protection (CP) records are not open to pupils or parents. Records may only be accessed by the Designated Safeguarding Lead. Records will be shared with appropriate agencies and where it is not clear which agencies require information, this will be

decided by the school's child protection officer, or a social worker.

27. Safety in the educational environment or approved education venue:

Authorised visitors to the centre will be logged into and out of the premises. Unidentified visitors will be challenged by staff or reported to the Safeguarding Leads.

Connect2Education Ltd conduct a safeguarding/risk assessment visit for any tuition required in a home environment, prior to tutors beginning tuition, as stated in the Service Level Agreement.

28. Working in partnership with parents, carers, and schools: It is our policy to work in partnership with parents, carers, and schools to secure the best outcomes for our children. We will use clear statements in our reports and correspondence. We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.

We will be alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services as necessary. We will make available a copy of this policy to any parent/carer who requests it. The policy will also be available through the Connect2Education website.

29. Monitoring and evaluation: The Designated Safeguarding Lead will monitor the safeguarding arrangements of Connect 2 Education Ltd on daily basis, in centre, to ensure that these arrangements are having a positive impact on the safety and welfare of children.

The Safeguarding Lead, or Deputy Safeguarding Lead is available to staff members throughout the working day and on call to ensure that staff are supported. Training for staff at Connect2Education will ensure that all staff are aware of the signs that children may be at risk of harm either within the educational setting, or in the family or wider community, outside the setting. Staff are also made aware of the timeliness of response to any safeguarding concerns that are raised and the correct person to raise concerns with, at the time.

30. Complaints: Any complaints arising from the operation of this policy will be considered by the Safeguarding Lead. If required, the Safeguarding Lead may contact the Local Authority Designated Officer for Safeguarding in Education Service [Complaints Policy Connect2Education](#) Please contact us via email for the Complaints Form, which is in Microsoft Word Format.

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