



## **SAFEGUARDING and CHILD PROTECTION POLICY**

**Designated Safeguarding Lead – Beverley Kirk**

**Deputy Designated Safeguarding Lead – Sally Robinson**

**Updated : September 2025**

## Safeguarding Policy

First Class Tailored Solutions Ltd is an off-site Education Provider for young people unable to attend mainstream education. Our tutors work in a variety of venues with young people.

**This policy applies to all staff** and will be reviewed by the DSL Beverley Kirk on a regular basis to ensure that it remains current and incorporates all revisions made to local and national safeguarding practice. FCTS will ensure that all parents/carers are made aware of our responsibilities regarding child protection procedures and how we will safeguard and promote the welfare of their children through the publication of the Safeguarding Policy on our website. These duties and responsibilities, as set out within the Education Act 2002 sec 175 and 157, DfE Statutory Guidance Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023 are incorporated into this policy.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children and young people. Children includes everyone under the age of 18. We will endeavour to provide a safe and welcoming learning environment where children are respected and valued. We will be alert to signs of abuse and neglect, mindful that safeguarding concerns could happen here whilst provision is in place, and we will follow our procedures to ensure that children receive effective support, protection and justice.

### **SAFEGUARDING IS EVERYONE'S RESPONSIBILITY, and involves**

- *providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing impairment of children's mental and physical health or development*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care*

First Class Tailored Solutions Ltd fully recognises the contribution it can make to protect children and young people and requires all staff to act in the best interest of the learners at all times.

The aim of the policy is to safeguard and promote learners' welfare, safety and health by fostering an honest, open, caring and supportive climate. The learners' welfare is of paramount importance. It is the intention of the procedures within our policy to ensure that the appropriate action is taken immediately where it is believed a learner may be at risk of significant harm or it is alleged that a learner is suspected of being abused. The prime concern at all times must be the interests and safety of the learner(s).

**All** staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring –at induction.

Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children, in line with 'Working Together' 2023 and 'Keeping Children Safe in Education' Sept 2025.

**The aims of this policy are to:**

- confirm that the learners' development is supported in ways that foster security, confidence and independence
- raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- confirm the structured procedures to be followed by all members of staff and those with designated responsibility for child safeguarding, health and safety and other safeguarding responsibilities
- emphasise the links with the company's guidelines for safe recruitment of staff and for managing allegations
- highlight the connection between the Safeguarding Policy and the company's policy for the safe recruitment of staff and for managing allegations
- confirm the relationship with local authority agencies centred around the safeguarding of children and young people

**Safeguarding and promoting the welfare of children is defined for the purposes of this document as:**

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

\*Children includes everyone under the age of 18.

**What staff should look out for:**

**Any** child may benefit from **early help**, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan); additional barriers can exist when recognising abuse and neglect for children with SEND, they can be more prone to peer group isolation or bullying and other safeguarding risks than other children and may not always show outward signs and may have communication barriers and difficulties in reporting challenges. FCTS will keep a record or data on the cohort of children having or have had a social worker and social care involvement.

- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, care or from home;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent/carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.
- Is deemed a 'looked after' child

It is important to remember that children may not be ready to talk about their experiences, they may not know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experience as harmful. Staff should always share their concerns about a child with the Case Manager and the DSL.

### **Roles and Responsibilities**

The Company's Designated Safeguarding Leads are Beverley Kirk and Sally Robinson. In the absence of either the DSL or Deputy DSL, Case Managers and/or Admin staff will deputise.

Where it is believed that a child may be suffering, or may be at risk of significant harm, the DSLs ensure that First Class Tailored Solutions Ltd follow the correct safeguarding procedures. The DSLs also ensure that full records are kept of any Safeguarding issue, that they are recorded on CPOMS. A single central database for all staff and their safeguarding training dates will be maintained and this list confirms that all staff have had a DBS check with the date of issue clearly identified.

All staff need to read and understand part 1 which contains important additional information about specific forms of abuse and safeguarding issues and be conversant with part 5 'Child on Child Sexual Violence and Sexual Harassment' of:

- Keeping Children Safe in Education September 2025

All staff members are aware of the need to record and report concerns about a child or children they teach. The DSLs are responsible for such records and for deciding at what point these records should be passed over to other agencies. Safeguarding records are held separately from a child's file and in secure electronic storage.

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

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

All staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children missing/absent from education, particularly where there are concerns regarding the potential for forced marriage or female genital mutilation.

### **Enhanced DBS**

A Single Central Register will be kept by admin staff detailing all pre-employment checks, specifying when the check was made and when it will be renewed, for example, all staff will undergo an Enhanced DBS check, renewed every four years, Barred List check, Right to Work in the UK etc (Please see Recruitment and Selection Policy) Where staff subscribe to the DBS Update service, these are checked annually. The SCR will contain details about safeguarding training dates.

The policy will be updated, at least, annually and will be available publicly via the company website.

### **Referrals**

The DSLs will: Refer cases of suspected abuse or allegations to the relevant investigating agencies; act as a source of support, advice and expertise within the educational establishment when deciding whether to make a referral by liaising with relevant agencies; liaise with the Managing Director to inform her of any issues and on-going investigations.

### **Training**

Role of the DSLs: To recognise how to identify signs of abuse and when it is appropriate to make a referral; have a working knowledge of how the Safeguarding Board operate, the conduct of a child protection case conference, and be able to attend and contribute to these effectively when required to do so; ensure each member of staff has access to and understands the Safeguarding Policy, especially new or part-time staff who may work with different educational establishments; ensure all staff have induction training covering Safeguarding and are able to recognise and report any concerns immediately they arise; be able to keep detailed, accurate and secure written records of referrals/concerns; obtain access to resources and attend any relevant or refresher training courses at least every two years.

### **Raising Awareness**

The DSLs will: Ensure the company's Safeguarding Policy is updated and reviewed annually. Ensure parents have access to the Safeguarding Policy via the website which alerts them to the fact that referrals may be made and the role of First Class Tailored Solutions Ltd in this process.

The Company Directors will ensure that: The policies and procedures adopted are fully implemented, and followed by all staff. An annual safeguarding refresher training will be completed by all staff.

## **Procedures and guidelines for all staff**

### **Actions where there are concerns about a child – key elements**

- **Recognition**
- **Response**
- **Inform Case Manager and DSL in line with company policy**

### **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, alcohol misuse, unexplainable and/or persistent absences from education and sexting (also known as youth produced sexual imagery) 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 and put children in danger. Issues such as domestic violence can impact on a child's well-being and learning, staff should be aware of the indicators and implications of such situations, changes in a child's presentation, demeanour, attendance etc.

### **Responding to a disclosure**

A 'disclosure' is when a learner confides information which is of a sensitive nature and which gives you cause to be particularly concerned e.g. being hit at home, a sexual assault, unfed, medical needs not attended to, inappropriate punishments by parents, continual verbal abuse, and pregnancy.

Always believe the learner and accept what he/she says and take the matter seriously, even if what you hear sounds unlikely.

Listen carefully and make notes. Only prompt the student by asking open questions eg. 'Is there anything else you want to tell me?' Write notes using the child's/YP's own words/descriptions. The pace should be dictated by the child/young person without them being pressed for detail. The role of staff is to listen, not investigate.

If bruising or injury is observed try to record the detail of it, eg. 'right arm above elbow.' Do not take photographs.

Take as much time as the learner needs. Reassure them that they have done the right thing by telling you. It is important that you avoid making promises you cannot keep, 'It'll be all right now.' 'I'll stay with you all the time.'

Make sure the learner understands that you will have to tell someone else in order to help them. This will only be on a 'need to know' basis; it will be confidential to as few people as possible.

*'Children want to be respected, their views to be heard, to have stable relationships with professionals built upon trust and for consistent support provided for their individual needs. This should guide the behaviour of professionals. Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; work with them collaboratively when deciding how to support their needs.'* Working Together 2018

## **Early help**

Any child may benefit from early help, see previous list 'What staff should look out for' help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

## **Immediate response to the pupil**

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

- listen to the learner, if you are shocked by what is being said, try not to show it
- it is okay to observe bruises but not to ask a pupil to remove their clothing to observe them
- if a disclosure is made,
  - accept what the learner says
  - stay calm, the pace should be dictated by the pupil without them being pressed for detail by asking leading questions such as "what did s/he do next?" It is your role to listen - not to investigate
  - use open questions such as "is there anything else you want to tell me?" or "yes?" or "and?"
  - be careful not to burden the pupil with guilt by asking questions like "why didn't you tell me before?"
  - acknowledge how hard it was for the learner to tell you
  - do not criticise the perpetrator, the learner might have a relationship with them
  - do not promise confidentiality, reassure the pupil that they have done the right thing, explain whom you will have to tell (the designated lead) and why; and, depending on the learner's age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as "I'll stay with you all the time" or "it will be all right now".

It is vital that staff alert Case Managers regarding any safeguarding concerns, this will then be communicated to DSLs. All safeguarding concerns will be shared with referrers immediately and future action jointly decided. A central safeguarding log will be maintained via CPOMS, and completed by either the member of staff, as instructed by CMs, or by the case manager.

All policies relating to Safeguarding will be reviewed annually. These guidelines apply to all young people receiving tuition from FCTS staff.

Children may be abused or placed at risk of harm in a family, institutional or community setting. Staff at First Class have a 'duty of care' to ensure that where abusive situations become known, they are dealt with, according to the clear guidance and procedures drawn up by the Nottinghamshire Safeguarding Children Board (NSCB)/Leicestershire and Rutland Children Partnership ([Irsb.org.uk](http://Irsb.org.uk)). For those staff working outside of Nottinghamshire please refer to the particular local authority's safeguarding guidance.

- Staff should be alert to signs and symptoms of harm, abuse, neglect and exploitation
- Staff should know how to respond when they have concerns or when a learner discloses to them and to take appropriate actions.
- Undergo child safeguarding training which is updated regularly in line with advice from the Safeguarding Boards (City and County).

Further guidance on effective assessment of the need for early help can be found in [Working Together to Safeguard Children](#).

### Supporting Learners

- The staff recognise that a child or young person who is abused or witnesses violence may find it difficult to develop and maintain a sense of self worth. We recognise that in these circumstances pupils might feel helpless and humiliated, and that they might feel self blame.
- We recognise that a child's tutor might provide the only stability in the lives of pupils who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a pupil in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn.
- Supporting children in care is a key priority for all staff. We recognise that the needs of this group of children can only be effectively met when all agencies work together.

### Reporting concerns to the designated leads

- Any concern should be discussed, in the first instance, with one of the designated leads, as soon as possible. **If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or police immediately. Anybody can make such a referral.**
- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;



- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made**;
  - only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

### **Legal responsibility**

In the exceptional case of a Safeguarding issue going to Court, the need for all staff involved to make and keep accurate notes is particularly pertinent. Any member of staff may be required to testify under oath.

Concerns raised by parents - These should be directed to the DSLs and the Managing Director.

### **Working Together**

Multi-agency expectations for **direct practice** are as follows:

**Collaborate:** practitioners working with the same child and family share information to get a complete picture of what life is like for the child. Collectively, they ensure the child's voice is at the centre and the right support is provided

**Learn:** practitioners learn together by drawing on the best available evidence from their individual fields and sharing their diverse perspectives during regular shared reflection on a child's development, experiences, and outcomes

**Resource:** practitioners build strong relationships across agencies and disciplines to ensure they support and protect the children with whom they work

**Include:** practitioners recognise the differences between, and are confident to respond to, circumstances where children experience adversity due to economic and social circumstances and acute family stress, and situations where children face harm due to parental abuse and neglect

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

## Understanding “information sharing”

Information sharing in a safeguarding context means the appropriate and secure exchange of personal information, between practitioners and other individuals with a responsibility for children, in order to keep them safe from harm.

This advice relates to sharing case-level information about individual children and, where necessary, information about family members and other people who might – through their actions or neglect – put a child at risk of harm. This includes informal sharing of information between practitioners to develop an accurate understanding of a child or family, and more formal processes of sharing information such as referrals into local authority children’s services. The principles of this advice may also be helpful to agencies or organisations managing larger scale sharing of child and family data, such as collation of data for development of local Joint Strategic Needs Assessments; however, this type of sharing is not the focus of this advice. ([see DFE Information Sharing – Advice for practitioners providing safeguarding services for children, young people, parents and carers](#)) April 2024

## Low Level Concerns

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.’ It is important that FCTS has a culture in which **all** concerns are dealt with appropriately and promptly.

Examples of such are when:

- an adult working in or on behalf of FCTS 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

It is important to consider ‘low level concerns.’ These should be recorded on the weekly On-Going Record of Involvement as cumulatively they could be significant, including any self-reporting incidents. All staff need to be alert to low level concerns as they may ultimately signal a safeguarding concern. Case Managers and referrers, in receipt of ORIs detailing ‘low level’ concerns are in a position to assess the cumulative significance of such concerns.

## **Child Focused**

At appropriate points children/YPs will be given opportunities to learn about safeguarding, including, on-line safety (E Safety Agreement), healthy and respectful relationships, boundaries and consent, and, what constitutes sexual harassment and sexual violence and why these are always unacceptable. Information should be presented in an age-appropriate way and demonstrating sensitivity to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and disabilities.

### **Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs.

Children may need this help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **Types of abuse**

#### **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. 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.

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.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a

child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.

Sexual harassment, on-line sexual abuse and sexual violence (including sexualised language) are unacceptable.

### **Female Genital Mutilation (FGM)**

**\*Any suspected cases of FGM must be reported to social care.**

Female Genital Mutilation occurs mainly in Africa and to a lesser extent, in the Middle East and Asia. Although it is believed by many to be a religious issue, it is a cultural practice. There are no health benefits.

Communities particularly affected by FGM in the UK include girls from:

Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

In the UK, FGM tends to occur in areas with larger populations of communities who practise FGM, such as first-generation immigrants, refugees and asylum seekers. These areas include:

London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes.

In England and Wales, 23,000 girls under 15 could be at risk of FGM.

**Key Points:**

- Not a religious practice
- Occurs mostly to girls aged from 5 – 8 years old; but up to around 15
- Criminal offence in UK since 1985
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison

**Reasons for this cultural practice include:**

- Cultural identity – An initiation into womanhood
- Gender Identity – Moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – un mutilated women are regarded as unclean.

**Risk Factors include:**

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the family's country of origin
- talk about a 'special' event or procedure to 'become a woman'

**High Risk Time**

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Staff should be alert to the possibility of FGM as a reason why a girl in a high risk group is absent from provision or where the family request an 'authorised absence' for just before or just after the summer school holidays.

Although, it is difficult to identify girls before FGM takes place, where girls from these high risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services. As of January 2016 staff should inform police directly if you comes across a case of FGM.

**Post-FGM Symptoms include:**

- difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

### **Longer Term problems include:**

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure
- cysts and abscesses
- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

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

\*It is important to consider wider environmental factors in a child's life that may be a threat to their safety. Extra-familial harm takes a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

### **Child on child abuse**

All staff should be aware that children can abuse other children. Sexual violence and sexual harassment can occur between two children of **any age and sex**, from primary through to secondary stage and into colleges, and on-line. It can occur 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.

All staff should understand that even if there are no reports of abuse it does not mean it is not happening. It may be the case that abuse is not being reported.

All staff will challenge the inappropriate behaviours between children that are abusive in nature. Abuse is abuse and should never be passed off as "banter" or "part of growing up" or "boys being boys". Downplaying certain behaviours can lead to a culture of unacceptable behaviour. It will be recorded, investigated and dealt with and the victims, perpetrators and any other child affected by child on child abuse will be supported.

Child on child abuse can take the form of abusive harassing, misogynistic messages, the sharing of indecent images, especially around chat groups, the sharing of abusive images and pornography to those who do not want to receive such content. Staff should be alert to this and report any concerns to the DSL. Peer on peer abuse can manifest itself in many other ways such as:

- CSE
- Harmful Sexual Behaviours, either online or face to face, encompassing, for example:
  - Sexting or youth produced digital imagery
  - Up skirting
- Bullying
- Radicalisation
- Abuse in intimate relationships
- Children who display sexually harmful behaviour
- Gang associated and serious violence (County Lines)
- Use of technology

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is important that staff work to reduce the additional barriers facing this group of learners and demonstrate compassion and sensitivity.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. All learners must be supported to report concerns about harmful sexual behaviour. All allegations, of any kind, will be taken seriously, comprehensively recorded and dealt with swiftly and appropriately.

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same educational provision. Staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of education, including intimate personal relationships.

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.

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

- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. **The key consideration is for staff not to view or forward illegal images of a child.**
- In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Ultimately, any decisions are for FCTS to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional

judgement, supported by other agencies, such as children's social care and the police as required.

It is essential that staff supervise learners at all times, especially in community venues where learners can come into contact with other children and young people, as well as the wider community.

### **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. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B.

### **Mental Health**

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

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

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.

### **Information sharing**

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for all stakeholders to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within FCTS and with the three safeguarding partners, other organisations, agencies and practitioners as required. Case Managers/staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns



about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

FCTS is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on the company and our staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Effective systems are in place for the online safety of all users and the security of devices used, covering systems, images, personal devices and data. The filtering and monitoring of websites is in place, in accordance with FCTS Information Security Policy. All staff must be aware of the risks of using on-line technologies and be able to ensure appropriate protection measures are followed.

### **On-line Safety**

Please see 'Remote Teaching and Learning Policy'

### **Artificial Intelligence (AI) and Digital Content Risks**

FCTS recognises that the rapid development and the use of AI and generative technologies present new opportunities and new safeguarding risks. AI tools may be used to produce or disseminate misinformation (incorrect content shared without intent) or disinformation (false content deliberately created to mislead). They can also generate deepfakes, altered or synthetic images, audio or video, that are deceptively realistic.

To mitigate these risks:

- Learners must not use AI systems unsupervised. Any use of AI in teaching, assignments or projects must be risk-assessed, age-appropriate and monitored.
- Staff and learners should treat AI generated content with caution, verifying and cross-checking rather than accepting at face value.
- If a learner or member of staff becomes aware of AI content that is harmful, misleading, or abusive (e.g. deepfake harassment, defamatory content) they must report it immediately via the usual safeguarding routes.
- Staff training will include awareness of AI based misuse, deception and emerging digital risks.
- FCTS will regularly review how AI tools are used in its environment and update safeguards accordingly.

### **Compliance with the Online Safety Act 2023**

In addition to statutory duties under the Children Act, KCSIE, and Working Together to Safeguard Children, FCTS acknowledges its responsibilities under the Online Safety Act 2023.

This includes ensuring that!

- Children are protected from harmful on-line content, including bullying, abusive communication, sexual exploitation, and other illegal content.
- Robust filtering and monitoring systems are in place to prevent access to harmful material, including deepfakes, misinformation and disinformation.
- Any on-line safety concerns, including abusive or illegal content, are reported to the DSL and escalated, where appropriate, to relevant platforms.

- Staff are trained to recognise the signs of online harm in accordance with the Online Safety Act.

As part of the induction and on-going professional development, all staff will receive training on digital safeguarding that includes AI related risks.

### **Filtering and Monitoring**

In line with KCSIE Sept 2025, effective systems are in place for the online safety of all users and the security of devices used, covering systems, images, personal devices and data. This takes the form of Multi Factor Authentication (MFA); the notification of the sending of sensitive data via email; privacy notices and annual data protection training. The various compliance systems help to keep our data safe, as well as ensuring our staff are aware of their responsibility to do the same. Additionally, the systems in place and the level of 1:1 staff supervision ensures that learners stay safe, that monitoring is in place and internet access is appropriate. Security and compliance within Office 365 is deemed effective in terms of its filtering and monitoring compliance, furthermore, policy labels within MS Exchange and MS Teams, MFA and data permissions in OneDrive work as effective control measures.

It is FCTS policy that no learners are allowed to use devices without direct staff supervision.

In addition, see the DfE Data Protection guidance for schools, which will help school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

See also DfE advice for teaching on-line safety.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a If there are concerns about a child in this area,

the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

### **Allegations against members of staff**

Should a member of staff find themselves in a situation whereby an allegation of abuse or other has been made against them, they should contact the Managing Director and DSLs. Do not discuss the allegation with other staff or approach the child. The Managing Director and DSLs will consult the document: 'Staff facing an allegation of abuse. Guidelines on practice and procedure' and will contact the Local Authority Safeguarding Officer or other appropriate agency officer. Should an allegation be made against management the LADO will be contacted by the DSL/Senior case manager and appropriate advice sought. Similarly, any allegations between students will be referred to the DSL.

Staff should not feel that awareness of these potentially serious issues detracts from developing positive relationships with young people or spoils the enjoyment that is derived from the challenge and pleasure of working with them. Both incidents of abuse and allegations against staff are rare. Staff should feel confident in the knowledge that they know the correct procedure and how the First Class Tailored Solutions Ltd will support them if they are involved in a Safeguarding issue.

### **Low Level Concerns about Staff Behaviour**

Any safeguarding concerns about the conduct of other adults should be referred to the DSL immediately. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO)

### **The initial response to an allegation**

Where FCTS identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.

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

Looking after the welfare of the child - the designated safeguarding lead 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 as described in Part one of KCSIE Sept 2025.

**Investigating and supporting the person subject to the allegation** - the DSL should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them – see Whistleblowing Policy.

## **Vulnerable Groups**

Some children and young people may be particularly vulnerable to abuse and harm. This includes for example privately fostered children, children with a disability, children with communication needs or other diagnosed SEND. Certain forms of behaviour can also increase the vulnerability of a young person such as drug or alcohol misuse.

### **Children in Care (LAC) and Children Previously in Care (PLAC)/ CEC (Children Experiencing Care)**

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

### **Private Fostering**

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

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

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

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

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

FCTS will take steps to verify the relationship of the adults to the child who is receiving tuition.

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

Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity a) it may involve an exchange for something the victim needs or wants, and/or b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if

the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

The sexual exploitation of children and young people (CSE) under-18 is defined as that which: 'involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (eg. Food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. The acquisition of money and/or goods without plausible explanation, gang-association and/or isolation from peers/social networks can also be indicators of CSE.

**Other indicators:**

- Exclusion or unexplained absences from sch, college or work
- Leaving home/care without explanation or persistently going missing or returning late
- Excessive receipt of text/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexualised assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

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

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

Young people with special educational needs and/or disabilities can be particularly vulnerable to various forms of abuse.

**Who is at risk?**

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

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser/s. As a result, victims do not make informed choices to enter into, or remain involved in, sexual exploitative

situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen on line. It can also occur between young people.

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

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.

*Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.*

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 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.

The 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.

Staff should be sensitive to the issues relating to the reporting of sexual violence and sexual harassment, situations where the YP asks that no one is informed about the incident, making referrals against the wishes of the YP and considering the potential impact of social media breaching confidentiality. Where the risk of harm to the child exists, referrals should always be made with clarity around not being able to guarantee confidentiality.

It is important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

[Annex B of KCSIE contains important additional information about specific forms of abuse, exploitation and safeguarding issues. All staff who work directly with children should read Annex B.](#)

### **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.

### **Who is vulnerable to county lines exploitation?**

The national picture on county lines continues to develop but there are recorded cases of:

- children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area; 15-16 years is the most common age range
- both males and females being exploited
- White British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationality may be exploited
- the use of social media to make initial contact with children and young people
- class A drug users being targeted so that gangs can take over their homes (known as 'cuckooing').

We do know that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- having prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a physical or learning disability
- having mental health or substance misuse issues;

- being in care (particularly those in residential care and those with interrupted care histories)
- being excluded from mainstream education, in particular attending a Pupil Referral Unit.

A number of the indicators for CCE and CSE 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 (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged 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.

If you suspect a learner may be involved in 'county lines' inform your CM and DSO immediately.

### **SafeCall in Schools and Colleges: A lifeline for children and families forced into criminal exploitation (Missing People)**

#### **County Lines – Threat, harm and risk to pupils and learners**

The threat associated with County Lines drug distribution networks has rapidly grown with over 2000 identified drug lines operating across the UK, primarily through dedicated mobile phone lines. Children and young people are approached physically or online before being targeted, groomed and exploited by drug gangs. They are forced to transport and store drugs, weapons and cash between import and export areas as well as to work on the line, delivering and dealing drugs, usually crack cocaine and heroin, to vulnerable drug users.

The nature of County Lines and Child Criminal Exploitation is a rapidly changing picture of threat, harm and risk. Gangs and those wishing to exploit children and vulnerable adults are continuously adapting their business tactics to increase their chances of going undetected by law enforcement and other agencies.

While continued lateness and poor attendance over a number of days were previously strong indicators of possible involvement in County Lines (alongside wearing two layers of clothing), there is now a move towards being missing for shorter periods during a school



day. This new trend avoids triggers being hit within school or college, and staff not being alerted as promptly to the missed lessons and absence.

SafeCall provides a national telephone based support service to those in crisis caused by County Lines including young people, families/carers and professionals. The helpline operates 24 hours a day, seven days a week.

For young people we provide crisis support, whether that is at 3PM on a Monday afternoon or 3AM on a Saturday morning. We are there to help them with safety planning and mapping, mobilising help from other agencies and supplying them with a free safety device (Ownfone) where appropriate.

### **Referring to SafeCall**

To refer a young person or family member (with their consent) there are a number of ways you can contact the team:

Complete the online referral form here:

<https://www.missingpeople.org.uk/how-we-can-help/safecall/974-are-you-a-professional.html>

Email - [safecall@missingpeople.org.uk](mailto:safecall@missingpeople.org.uk)

Telephone Safecall - 0208 392 5710 between 10.00 – 18.00 hours Monday to Friday

Telephone Missing People Helpline 24 hours, 7 days a week - 116 000 (who will respond outside of Safecall office hours)

Download more information about SafeCall: SafeCall in Schools and Colleges <https://www.safeguardingschools.co.uk/safecall>

### **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 (see paragraphs 33-35).

**All** staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, 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. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

## **Online safety – see also Online Safety and Remote Teaching and Learning Policy**

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

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group

First Class Tailored Solutions will regularly review the effectiveness of the monitoring and filtering arrangements. (Matt Quinton IT Manager – [matt.quinton@first-class.org.uk](mailto:matt.quinton@first-class.org.uk))

### **Children potentially at greater risk of harm**

Whilst **all** children should be protected, it is important that governing bodies and proprietors recognise some groups of children are potentially at greater risk of harm.

### **Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child’s experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead/Case Manager should hold and use this information so that decisions can be made in the best interests of the child’s safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action the government is taking to support this.

### **Children missing from education/Children who are absent from education**

Children missing from education, particularly persistently, or those absent from education for prolonged periods and/or on repeat occasions, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation. It is important that FCTS's response to children missing from education and those absent from education, supports identifying such abuse and, in the case of absent learners, helps prevent them from becoming a child missing from education in the future, and/or helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community.

### **Elective Home Education (EHE)**

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

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

N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When

parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

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

## **Attendance**

### **Reporting of Attendance**

Attendance is recorded electronically both AM and PM for all learners. Staff complete attendance on the central database SELIMS within 30 mins of the start of a tutoring session. There is an Attendance Officer who checks that all attendance is recorded, and where requested, informs referrers, on a daily basis, about a learner's attendance.

The Attendance Officer completes other attendance systems operated by referrers, for example CLM (Notts County Council).

Any non attendance, on a session by session basis, will be reported by the Tutor to the Case Manager who will then make a call to the home to report the young person's non attendance. This will also be communicated to our referrers in line with contractual agreements. FCTS do not operate a 'send home' policy for lateness. The tutor will wait 30 minutes before contacting all relevant parties and if appropriate the Case Manager/tutor will carry out a home visit.

In the event of a young person walking off without permission tutors should make a reasonable attempt to locate the learner, tutors should contact the parent/carers and Case Manager, this will be passed on to all relevant parties.

During break times it is important that staff keep learners within sight at all times.

Staff should be aware that truancy can put young people in danger.

\*CMs should ensure that THREE contact phone numbers are obtained on the first home visit following a referral, an absolute minimum of TWO phone contacts.

The reporting of attendance by FCTS staff will flag up to referrers immediately if there are any concerns relating to CME.

## **Health and Safety**

A learner risk assessment will be completed/obtained as a result of referrer information and following the Induction Meeting conducted by the Case Manager.

Venues identified for tuition will have been risk assessed prior to use. Health and Safety Regulations such as 'Procedures in the event of a fire' will be explained to the learner on the first visit.

## **Drugs and Substance misuse**

Any young person thought to be in possession of or under the influence of drugs will be reported by the tutor to the Case manager who will contact the parent/carer. The appropriate agencies will also be informed.

Learners found in possession of illegal substances will have them confiscated and it is likely that the illegal substances will be destroyed, staff ensuring that either photographic evidence of the disposal is captured or witnesses present. It is probable that the police will be informed.

It is particularly important to be aware of '**County Lines**' and accordingly be vigilant whilst working with learners. The UK Government defines county lines as: County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. Those involved in

## **Child Trafficking**

Child trafficking is a very serious issue which can have a devastating and lasting impact on its victims. Children can be trafficked into, within and out of the UK.

## **Knife Crime**

Knife crime is a major concern nationally and in particular for the risk it poses to young people. Carrying a knife puts a young person at risk of being harmed by a knife. Possession of a knife can impact on a YPs future and the use of a knife has consequences for both the victim and the offender.

The possession of a knife can be an early indicator of further offending if the underlying behaviour is not challenged. It is important that all knife related incidents are dealt with appropriately.

Step 1: Manage any immediate risk of harm, call the police if there is an immediate risk of harm to others.

Step 2: record the details of the incident.

Step 3: Assess and record if there is any on-going risk of harm from the incident. Of particular importance is the issue of reprisals from any conflict but you should also consider the risks to any potential witnesses, especially other YPs.

Step 4: Inform the DSL

Step 5: DSL/CM to inform the YOT Police, sharing the details and the RA.

## **Medical Needs**

Where a learner requires the administration of medication during a tutoring session, written parental consent will be sought within the induction meeting with case managers.

Where a learner remains on the roll of a school, written permission to administer medication, will also be sought from the Head teacher.

In the event of a medical emergency an ambulance will be called by the member of staff and parents/carers/case manager informed immediately. In the key venues used by FCTS staff, Ransom Wood and Grove House Stables there are trained FCTS First Aiders on site, additionally libraries have an on-site First Aider.

### **Lone Working**

Staff should never work alone with a child/young person, a parent/carer must always be present. See Lone Working Policy.

All staff are encouraged to use the 'Stay Safe' mobile phone app which allows staff to check in at the start of a session and check out at the end.

### **Social Networking/ICT Acceptable Use**

Staff must not liaise/communicate with any young person being tutored by FCTS via any form of social networking site.

This message is conveyed through regular e mails and during the 'Safeguarding' update at the start of every staff meeting. (Held half-termly)

Additionally, the safe use of 'multi media' in its widest sense, particularly internet use, must be promoted by staff and vigilantly monitored.

An E Safety Acceptable Use Statement will be signed by learners during the initial meeting with Case Managers, parents will also be made aware of acceptable use guidelines

### **Mobile Phones**

Staff need to be alert to any inappropriate material viewed by a young person on any mobile device. In addition, practices such as 'sexting' can put young people in danger.

### **Sexting**

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

### **Preventing Violent Extremism**

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**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.

'Prevent' is one strand of the Government's counter-terrorism strategy, CONTEST. Its main aim is to prevent people becoming terrorists or supporting terrorism. The Counter-terrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of becoming radicalised.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who

might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) [making a Prevent referral](#).

The 'Prevent' Strategy has 3 clear objectives:

- Terrorist ideas should be identified and challenged
- Vulnerable people should be supported and protected from becoming terrorists or supporting terrorism
- Communities, institutions and the Government should all work together to tackle the problem of extremism.

It is the duty of all First Class staff to 'safeguard' our learners from radicalisation and extremism in any form, eg. right wing extremism or extremism relating to animal rights, and duly inform the DSLs if there are any concerns relating to this issue.

### **Spotting the signs of radicalisation**

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

Statutory guidance has been published and is available here:

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

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

Statutory guidance has been published and is available here:

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

### **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 FCTS 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 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.

Statutory guidance on Channel is available at: [Channel guidance](#).

### **‘Honour-based violence’**

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Staff should be alert to a violent crime or incident which may be committed to protect or defend the honour of the family or community.

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

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

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

### **Children with continence issues**

Having control over continence is a developmental skill, and like other skills, children will attain it at different ages. Bedwetting (also known as nocturnal enuresis) is common and very few children will wet the bed on purpose. Bedwetting and daytime continence issues can have a significant impact on a child's behaviour and wellbeing. It can also be stressful for the parents or carers.

When supporting the child and their family, the emphasis must be on normalisation, no blame, no shame and strictly no punishments. Children should not be held responsible for their continence issues - rewards for dry nights are therefore unhelpful. NICE guidelines make it clear that maltreatment should be considered if a child is consistently reported to be deliberately wetting themselves, or the parents or carers are repeatedly punishing the child for their continence issues despite professional advice that it is involuntary.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local



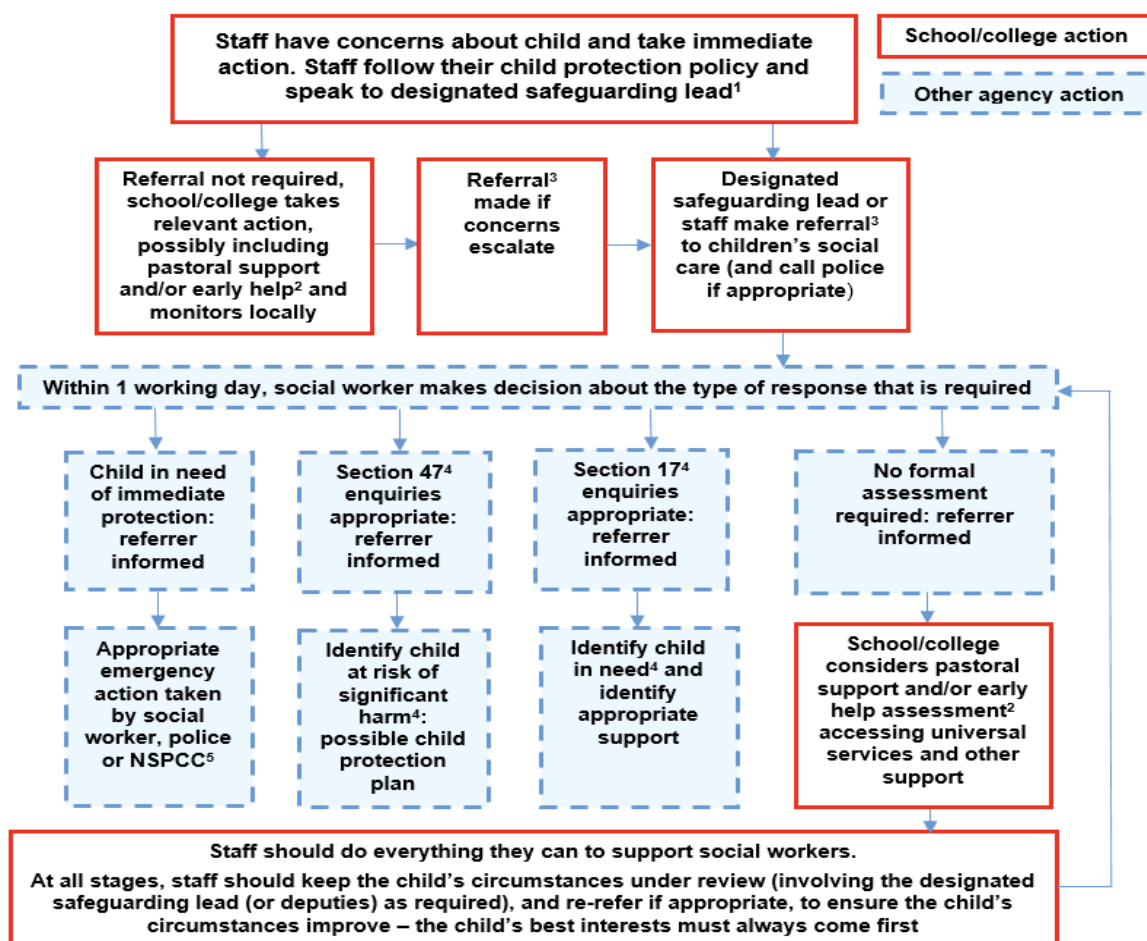
procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

## COVID (historical)

All staff are expected to remain up to date with government guidelines about managing the on-going effects of the pandemic, this includes:

- An awareness of hygiene requirements – eg. frequent hand washing, sanitising
- An awareness of PPE requirements – eg. The use of masks/visors
- The requirement for thorough risk assessments for tutoring
- An awareness of symptoms
- Remote Learning – See Remote Teaching and Learning Policy

## Safeguarding Flowchart



Please refer to Keeping Children Safe in Education September 2025 for further information, support and guidance on all issues of safeguarding.

[https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping\\_children\\_safe\\_in\\_education\\_from\\_1\\_September\\_2025.pdf](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)

\*\*\*All staff have read 'Keeping Children Safe in Education Sept 2025', Parts 1 and 5, and Annex B, also 'Working Together to Safeguard Children', Dec 2023, these form part of the annual safeguarding refresher training.