



Child Protection and Safeguarding Policy (Including Safer Recruitment, Allegations against Team Members and Low-Level Concerns)

Contents

Version History	3
Executive Summary.....	3
1. Aims.....	4
2. Legislation and Statutory Guidance	4
3. Definitions.....	6
4. Equality Statement.....	8
5. Legislation and Statutory Guidance	8
5.1 All team members	9
5.2 The designated safeguarding lead (DSL)	11
5.4 The Manager	14
5.5 Virtual school heads.....	15
6. Confidentiality	15
7. Recognising Abuse and Taking Action.....	17
7.1 If a child is suffering or likely to suffer harm, or in immediate danger.....	18
7.2 If a child makes a disclosure to you	18
7.3 If you discover that FGM has taken place or a children/young people is at risk of FGM 19	
7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)	20
7.5 If you have concerns about extremism	21
7.6 If you have a concern about mental health	22
7.7 Concerns about a team member, supply teacher, volunteer or contractor.....	25

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 1 of 87
---	--------------------------------------	------------------------------------	--------------



7.8 Allegations of abuse made against other children/young people	25
7.10 Reporting systems for our children/young people	31
8. Online Safety and the Use of Mobile Technology	32
8.1 Artificial intelligence (AI).....	34
9. Notifying Parents or Carers	35
10. Children/Young People with Special Educational Needs, Disabilities or Health Issues 36	
11. Children/Young People with a Social Worker.....	36
12. Looked -After and Previously Looked-After Children	37
13. Children and Young People who are Lesbian, Gay, Bisexual or Gender Questioning ...	37
14. Complaints and Concerns about Provision Safeguarding Policies.....	38
14.1 Complaints against team members.....	38
14.2 Other complaints	38
15. Record-Keeping.....	40
16. Training	41
16.1 All team members	41
16.2 The DSL and (Deputy)	42
16.3 Governance Team	42
16.4 Recruitment – interview panels	42
17. Links with Other Policies	43
APPENDIX 1: TYPES OF ABUSE	44
APPENDIX 2: SAFER RECRUITMENT AND DBS CHECKS	46
APPENDIX 3: ALLEGATIONS OF ABUSE MADE AGAINST TEAM MEMBERS	53
APPENDIX 4: SPECIFIC SAFEGUARDING ISSUES.....	65
APPENDIX 5: KEY CONTACT INFORMATION	82
APPENDIX 6: EQUALITY IMPACT ASSESSMENT.....	85

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 2 of 87
---	--------------------------------------	------------------------------------	--------------



Version History

Version No.	Author/Editor	Approved by	Date Issued	Next Review Date	Brief Summary of Changes
1	Lorraine Miranda	Rhea Marwaha	15.04.2026	14.04.2029	New Policy

Executive Summary

Nova Newcastle Ltd Alternative Provision places safeguarding and the promotion of children and young people’s welfare at the heart of all practice, decision-making, and provision delivery. Safeguarding is embedded as a whole-provision responsibility and underpins the culture, systems, and expectations for all team members, volunteers, leaders, and those with governance responsibility.

This policy sets out the clear and robust arrangements through which safeguarding concerns are identified, managed, recorded, and reviewed. It establishes defined roles and lines of accountability, including strong leadership oversight through the designated safeguarding lead and deputy, ensuring that safeguarding practice is consistent, proactive, and responsive.

The provision operates a child-centred, trauma-informed approach, recognising that children attending alternative provision may experience heightened vulnerability due to factors such as adverse childhood experiences, special educational needs and disabilities, mental health needs, social care involvement, or disrupted education. Safeguarding arrangements are therefore designed to remove barriers to disclosure, promote professional curiosity, and ensure that children are listened to, believed, and supported.

Clear procedures are in place for responding to concerns about children, allegations against team members, low-level concerns, and child-on-child abuse. These procedures ensure timely action, appropriate escalation, accurate record-keeping, and effective multi-agency working, with the safety and welfare of the child always taking precedence.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 3 of 87
---	--------------------------------------	------------------------------------	--------------



Safeguarding practice is informed by local contextual safeguarding risks and community safety priorities, ensuring that emerging threats affecting children and young people are recognised and addressed through preventative education and safeguarding systems.

The policy also sets out comprehensive expectations for safer recruitment, ongoing training, supervision, and conduct, ensuring that adults working within the provision are suitable, well-trained, and held to consistently high professional standards.

Online safety and the use of technology are integral to safeguarding practice. The provision recognises the evolving risks presented by digital environments, including online exploitation, peer harm, and emerging technologies, and has appropriate measures in place to educate, protect, and monitor children and adults.

Through regular review, strong governance oversight, and a commitment to continuous improvement, Nova Newcastle Ltd Alternative Provision ensures that safeguarding arrangements remain effective, compliant, and firmly focused on keeping children and young people safe.

1. Aims

Nova Newcastle Ltd Alternative Provision aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare.
- All team members are aware of their statutory responsibilities with respect to safeguarding.
- All team members are properly trained in recognising and reporting safeguarding issues.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education’s (DfE’s) statutory guidance Keeping Children Safe in Education (latest version) and Working Together to Safeguard Children (2023),. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 4 of 87
---	--------------------------------------	------------------------------------	--------------



- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and alternative provisions to safeguard and promote the welfare of pupils at the alternative provision.
- 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
- Tackling Violence Against Women and Girls Strategy, which sets out the Government’s plans to tackle violence against women and girls.
- 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 age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and provision manager should carefully consider how they are supporting their children/young people with regard to these characteristics. The Act allows our alternative provision to take positive action to deal with particular disadvantages affecting a specific

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 5 of 87
---	--------------------------------------	------------------------------------	--------------



group of children/young people (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled children/young people. 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 children/young people outcomes. Some children/young people may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.

Alternative Provision, which explains statutory duties and powers concerning alternative provisions.

Localised, Newcastle Guidance:

- Newcastle Guidance, Multi Agency Safeguarding Hub, Multi Agency Safeguarding Hub (MASH) Newcastle County Council
- Newcastle Procedures, Allegations against adults in the children's workforce, Allegations against adults in the children's workforce, Newcastle County Council
- Newcastle Referral Processes, Inter-Agency Referral Forms, New Inter-Agency Referral Form Newcastle

3. Definitions

Safeguarding and promoting the welfare of children means:

- 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

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 6 of 87
---	--------------------------------------	------------------------------------	--------------



- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what’s appropriate and which terms to use on a case-by-case basis.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 7 of 87
---	--------------------------------------	------------------------------------	--------------



4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
Are looked after or previously looked after (see section 12).
- Are missing or absent from education for prolonged periods and/or frequently.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

5. Legislation and Statutory Guidance

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 8 of 87
---	--------------------------------------	------------------------------------	--------------



Safeguarding and child protection is everyone’s responsibility. This policy applies to all team members, volunteers and governance team in the alternative provision and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended alternative provision and off-site activities.

Education settings play a crucial role in preventative education. This is in the context of a whole-setting approach to preparing children/young people for life in modern Britain, and a culture of ensuring harmful behaviour of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment is recognised and addressed with an emphasis on relationships, accountability and support. Preventative education is also informed by local contextual safeguarding risks and community safety priorities, including those identified within the Safe Newcastle Community Safety Partnership Plan (2022–2025). This will be underpinned by our:

- Relational Policy
- Pastoral support system
- Discussion and guidance, tackling issues such as:
- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.
- What constitutes sexual harassment and sexual violence and why they’re always unacceptable.

5.1 All team members

All team members will:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 9 of 87
---	--------------------------------------	------------------------------------	--------------



Read and understand part 1 and annex B of the Department for Education’s 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 communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they’ll be interacting with online).
- Provide a safe space for children/young people who are LGBTQ+ to speak out and share their concerns.

All team members will be aware of:

- Our systems that support safeguarding, including this safeguarding policy, the team code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the relational approach policy, online safety policy and the safeguarding response to children who go missing from education/who are absent from education. The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 10 of 87
---	--------------------------------------	------------------------------------	---------------



- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

The fact that children can be at risk of harm inside and outside of their home, at school and online.

- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.
- That a child and their family may be experiencing multiple needs at the same time.
- What to look for to identify children who need help or protection

Section 16 and appendix 4 of this policy outline in more detail how team members are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Loreena Lawson. The DSL takes lead responsibility for child protection and wider safeguarding in the provision. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep children/young people safe online.

During term time, the DSL will be available during school hours for team members to discuss any safeguarding concerns.

The DSL can also be contacted out of ours if necessary via **????**

When the DSL is absent, the deputy, will act as cover.

If the DSL and deputy are not available, Rhea Marwaha, Director of Safeguarding, will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other team members on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other team members to do so.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 11 of 87
---	--------------------------------------	------------------------------------	---------------



- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support team members who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at our alternative provision.
- Make sure that team members have appropriate Prevent training and induction. The DSL will also:

Keep the Alternative Provision Manager informed of any issues.

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children’s social care colleagues to prepare the provision’s policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and deputy are set out in their job description.

5.3 The Governance Team

Governance arrangements apply proportionately depending on the provision’s structure.

The governance team:

- Facilitate a whole-alternative provision approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 12 of 87
---	--------------------------------------	------------------------------------	---------------



- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the alternative provision manager to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our provision’s local multi-agency safeguarding arrangements.
- Appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the governance team. This is always a different person from the DSL.
- Ensure all team members undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the provision has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and team members are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 - Reviewing the DfE’s filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the provision in meeting these standards.

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Online safety is a running and interrelated theme within the whole-alternative provision approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- Nova Newcastle Ltd Alternative Provision has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 13 of 87
---	--------------------------------------	------------------------------------	---------------



level concerns) about team members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.

- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the provision roll):
 - o Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
 - o Make sure there are arrangements for the body to liaise with the provision about safeguarding arrangements, where appropriate.
 - o Make sure that safeguarding requirements are a condition of using the alternative provision premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The chair of the governance team will act as the ‘case manager’ in the event that an allegation of abuse is made against the provision manager, where appropriate (see appendix 3).

All members of the governance team will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The Manager

The manager is responsible for the implementation of this policy, including:

- Ensuring that team members (including temporary staff) and volunteers:
 - o Are informed of our systems that support safeguarding, including this policy, as part of their induction.
 - o Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the provision and via the website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 14 of 87
---	--------------------------------------	------------------------------------	---------------



- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of team member or volunteer, where appropriate (see appendix 3).
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children/young people with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

The statutory duty for Alternative Provision sits under Section 19 of the Education Act 1996. Local Authorities must arrange suitable full-time education for children of compulsory school age who cannot attend school due to exclusion, illness or other reasons. The education must be appropriate to the child’s age, ability, aptitude and any SEND needs, and should normally be full-time. Schools must also ensure education is arranged from the sixth day of exclusion where a pupil is suspended.

6. Confidentiality

Nova Newcastle Ltd Alternative Provision’s approach to confidentiality and data protection recognises and ensures:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 15 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- If team members need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Team members should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests.
- If a victim asks a team member not to tell anyone about the sexual violence or sexual harassment:
- There’s no definitive answer, because even if a victim doesn’t consent to sharing information, team members may still lawfully share it if there’s another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim’s wishes against their duty to protect the victim and other children The DSL should consider that:
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- 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
- 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. Regarding anonymity, all team members will:
- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which team members should know about the report, and any support for children involved

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 16 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support team members who have to make decisions about sharing information.
- If team member's are in any doubt about sharing information, they should speak to the DSL (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against team members in appendix 3

7. Recognising Abuse and Taking Action

All team members are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 17 of 87
---	--------------------------------------	------------------------------------	---------------



- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called ‘honour’-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child.
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of fulltime education.
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

Team members, volunteers and the governance team must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean ‘the DSL (or deputy DSL)’.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children’s social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 18 of 87
---	--------------------------------------	------------------------------------	---------------



- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a children/young people is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’ ‘circumcision’ or ‘initiation’.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 19 of 87
---	--------------------------------------	------------------------------------	---------------



Possible indicators that a child/young person has already been subjected to FGM, and factors that suggest a child/young person may be at risk, are set out in appendix 4 of this policy.

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 they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

The duty for teachers mentioned above does not apply in cases where a child/young person is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine the child/young person.

Any member of the team who suspects a child/young person is at risk of FGM or suspects that FGM has been carried out or discovers that a child/young person aged 18 or over appears to have been a victim of FGM] should speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 20 of 87
---	--------------------------------------	------------------------------------	---------------



Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Team members may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review, and the provision will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The DSL will follow Newcastle Guidance in relation to professional escalation and resolution Working Together to Resolve Professional Differences (Escalation and Resolution).

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 21 of 87
---	--------------------------------------	------------------------------------	---------------



directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which team members and governance team can call to raise concerns about extremism with respect to a child/young person. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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.

Team members If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 22 of 87
---	--------------------------------------	------------------------------------	---------------



Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 23 of 87
---	--------------------------------------	------------------------------------	---------------



You have concerns about a child

Speak to the DSL

Referral not required. School takes relevant action and monitors locally

You or the DSL make a referral to the LA's social care team (and call the police if appropriate)

If concerns escalate, make a referral

Within 1 working day, a social worker makes a decision about the type of response required

LA's social care team takes action and informs the referrer

No formal assessment required

School considers early help assessment and accesses other support as appropriate

Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child's best interest must always come first at all stages.

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7.7 Concerns about a team member, supply teacher, volunteer or contractor

If you have concerns about a member of the team (including a supply teacher, volunteer or contractor), or an allegation is made about a member of the team (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the manager as soon as possible. If the concerns/allegations are about the manager, speak to the chair of governance team.

The manager/chair of governance team will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the manager, speak to Chair of governance team.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of team member (including a supply teacher, volunteer or contractor) to the manager, or the Chair of governance team, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the provision premises for running an activity for children, follow our provision safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other children/young people

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children/young people.

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children/young people hurting other children will be dealt with under our relational approach policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put children/young people in the provision at risk
- Is violent

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 25 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Involves children/young people being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a child/young person makes an allegation of abuse against another:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering provision transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CYPS/CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in education and minimising the risk of child-onchild abuse

We recognise the importance of taking proactive action to minimise the risk of child-onchild abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 26 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female children/young people, and initiation or hazing-type violence with respect to boys.
- Ensure our environment helps to educate children/young people about appropriate behaviour and consent.
- Ensure children/young people are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure team members reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure team members are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in provisions, it does not mean it is not happening – team members should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 27 of 87
---	--------------------------------------	------------------------------------	---------------



- A member of the team may overhear a conversation
- A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a child/young person harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead in responding to any safeguarding concerns, including addressing the behaviour of the alleged perpetrator(s). Any necessary disciplinary action will be balanced with appropriate support, ensuring that all children/young people involved are listened to and cared for

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our provision from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes (‘sexting’)

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 28 of 87
---	--------------------------------------	------------------------------------	---------------



Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer generated images that otherwise appear to be a photograph or video (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a child/young person to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the child/young person to delete it
- Ask the children/young people who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of the team, the child/young person(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the child/young person (s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate team member– this may include the team member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to the child/young person(s)
- If a referral needs to be made to the police and/or children’s social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 29 of 87
---	--------------------------------------	------------------------------------	---------------



- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the child/young people involved which would influence risk assessment
- If there is a need to contact a school, college, setting, or individual.
- Whether to contact parents or carers of the child/young person(s) involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children’s social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
- The imagery involves sexual acts and any children/young people in the images or videos is under 13.
- The DSL has reason to believe a child/young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the manager and other members of the team as appropriate, may decide to respond to the incident without involving the police or children’s social care. The decision will be made and recorded in line with the procedures set out in this policy.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 30 of 87
---	--------------------------------------	------------------------------------	---------------



Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the children/young people involved (if appropriate).

If at any point in the process there is a concern that a child/young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the child/young person at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be lead by the DSL.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

7.10 Reporting systems for our children/young people

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring children/young people feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for children/young people to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children/young people.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 31 of 87
---	--------------------------------------	------------------------------------	---------------



- Make it clear to children/young people that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Children/young people are supported to understand the role of the DSL and to share any concerns with key team member.

8. Online Safety and the Use of Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our provision aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of children/young people, team members, volunteers and the governance team.
- Protect and educate the whole community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’).
- Set clear guidelines for the use of mobile phones for the whole community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

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

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 32 of 87
---	--------------------------------------	------------------------------------	---------------



- **Contact** – being subjected to harmful online interaction with other users, such as 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, such as making, sending and receiving explicit images (e.g. consensual and nonconsensual 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

Support children/young people’s understanding concerning online safety. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring children/young people are encouraged to do so, including where they’re a witness rather than a victim
- Train team members, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All team members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents’ evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make team members aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Team members are allowed to bring their personal phones to work for their own use, but will limit such use to non-contact time when children/young people are not present.
 - Team members will not take pictures or recordings of children/young people on their personal phones or cameras.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 33 of 87
---	--------------------------------------	------------------------------------	---------------



- Make all children/young people, parents/carers, team members, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in the provision, use of the provision’s ICT systems and use of their mobile and smart technology.
- Make sure all team members, children/young people and parents/carers are aware that team member’s have the power to search children and young perople’s phones, as set out in the DfE’s guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children’s exposure to the 4 key categories of risk (described above) from the provision’s IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our community.
- Provide regular safeguarding and children protection updates including online safety to the team, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our policies in these areas, please refer to our online safety policy.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Team members, children/young people and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Nova Newcastle Ltd Alternative Provision recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard children/young people. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose children/young people to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Nova Newcastle Ltd Alternative Provision will treat any use of AI to access harmful content or bully children/young people in line with this policy and our [antibullying/relational/artificial intelligence] policies.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 34 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Team members should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the provision. Our provision's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

9. Notifying Parents or Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other team members will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the home school and/or local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the home school, police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 35 of 87
---	--------------------------------------	------------------------------------	-----------------------------



10. Children/Young People with Special Educational Needs, Disabilities or Health Issues

We recognise that children/young people with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Children/young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children/young people.
- The potential for children/young people with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges

Any abuse involving children/young people with SEND will require close liaison with the DSL (or deputy)

11. Children/Young People with a Social Worker

Children/young people may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of team members will work with and support social workers to help protect vulnerable children.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 36 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Where we are aware that a children/young people has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the children/young people’s safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. Looked -After and Previously Looked-After Children

We will ensure that team member’s have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate team members have relevant information about children’s looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children’s social workers and will liaise with home school and relevant virtual school heads where appropriate.

13. Children and Young People who are Lesbian, Gay, Bisexual or Gender Questioning

We recognise that children/young people who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our relational approach policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 37 of 87
---	--------------------------------------	------------------------------------	---------------



When families/carers are making decisions about support for gender questioning children/young people, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning children/young people, we will take a cautious approach as there are still unknowns around the impact of social transition, and a child/young person may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the child/young person). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where children/young people can speak out or share their concerns with members of the team.

14. Complaints and Concerns about Provision Safeguarding Policies

14.1 Complaints against team members

Complaints against team members that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against team members (see appendix 3).

14.2 Other complaints

Complaints will be managed in accordance with Nova Newcastle Ltd's complaints policy.

14.3 Whistleblowing

Nova Newcastle Ltd is committed to creating a culture of openness, transparency, and accountability in which all team members feel confident to raise concerns about safeguarding practice, professional conduct, or the way in which children and young people are protected.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 38 of 87
---	--------------------------------------	------------------------------------	---------------



Whistleblowing refers to the reporting of concerns about unsafe, inappropriate, unlawful, or unethical practice that may place children or young people at risk, or undermine the integrity of safeguarding arrangements. This includes concerns that may not meet the threshold for a formal safeguarding allegation but nonetheless require attention.

Concerns that may be raised under the whistleblowing procedure include, but are not limited to:

- Failure to follow safeguarding policies or procedures
- Failure to report safeguarding concerns, disclosures, or incidents
- Poor or unsafe practice that may compromise the safety or welfare of children or young people
- Breaches of professional boundaries or the code of conduct
- Inappropriate relationships or contact with children or young people
- Falsification of records or deliberate misreporting of safeguarding information
- Attempts to conceal safeguarding concerns or discourage reporting
- Inadequate supervision, training, or leadership oversight where this impacts safeguarding
- Conduct that may bring the provision into disrepute or undermine public confidence in safeguarding arrangements

All team members are encouraged to raise concerns at the earliest opportunity. Concerns should normally be raised with the Alternative Provision Manager, the Designated Safeguarding Lead, or another senior leader, in line with the provision's whistleblowing policy.

Where a team member feels unable to raise a concern internally, or believes that their concern has not been taken seriously or addressed appropriately, they may escalate the matter externally in accordance with statutory guidance. This may include contacting the local authority, the Local Authority Designated Officer (LADO), the relevant safeguarding partners, or the NSPCC Whistleblowing Advice Line.

Team members who raise genuine concerns in good faith will be supported and protected from detriment or victimisation. Malicious or deliberately false allegations may be addressed through the provision's disciplinary procedures.

Further information about how to raise concerns, including reporting routes and sources of independent advice, is set out in the provision's Whistleblowing Policy.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 39 of 87
---	--------------------------------------	------------------------------------	---------------



15. Record-Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the provision.

If a child for whom the provision has, or has had, safeguarding concerns leaves the provision, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main file to the home school.

To allow the home school time to ensure the new school/colleges receives the information for when the child arrives, the file will be transferred within 28 days of the child/young person leaving the provision.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the home school and if necessary, the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 40 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Nova Newcastle Ltd Alternative Provision maintains electronic records with CPOMs records maintained for safeguarding files.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against the team.

16. Training

16.1 All team members

All team members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the provision's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-provision safeguarding approach and wider team training.
- Be in line with advice from the 3 safeguarding partners (LA; Police; Health)
- Include online safety, including an understanding of the expectations, roles and responsibilities for team members around filtering and monitoring

All team members will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Team members will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and team meetings).

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 41 of 87
---	--------------------------------------	------------------------------------	---------------



Volunteers will receive appropriate training, if applicable.

16.2 The DSL and (Deputy)

The DSL and (deputy) will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Governance Team

All members of the governance team receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the provision to deliver a robust whole-setting approach to safeguarding.

As the chair of governance may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the provision manager, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the provision will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See appendix 2 of this policy for more information about our safer recruitment procedures.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 42 of 87
---	--------------------------------------	------------------------------------	---------------



17. Links with Other Policies

This policy links to the following policies and procedures:

- Relational Approach Policy
- Code of Conduct
- Whistleblowing
- IT Acceptable Use
- Complaints
- Health and safety
- Attendance
- Online safety
- AI
- Equality, Diversity and Inclusion
- First aid

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 43 of 87
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 1: TYPES OF ABUSE

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 44 of 87
---	--------------------------------------	------------------------------------	---------------



- 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
- 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 45 of 87
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 2: SAFER RECRUITMENT AND DBS CHECKS

Safer recruitment policy Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of team members to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our provision's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 46 of 87
---	--------------------------------------	------------------------------------	---------------



- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
 - If they are known to the policy and children’s local authority social care and
 - If they have been disqualified from providing childcare
 - Sign a declaration confirming the information they have provided is true

We will also complete an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview. When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 47 of 87
---	--------------------------------------	------------------------------------	---------------



- Ensure any references are from the candidate’s current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate’s most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate’s suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in our provision’s single central record (SCR). Copies of these checks, where appropriate, will be held in individuals’ personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New team members

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new team member’s, we will:

- Verify their identity

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 48 of 87
---	--------------------------------------	------------------------------------	---------------



- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate we will keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of team member's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all team members, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 49 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Existing team members

In certain circumstances we will carry out all the relevant checks on existing team members as if the individual was a new member of the team. These circumstances are when:

- There are concerns about an existing member of team member’s suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the ‘harm test’ is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the provision has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 50 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the provision.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity .
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Governance Team

The chair of the governance team will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governance team and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008
- Identity

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 51 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise children/young people on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a child/young person under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 52 of 87
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 3: ALLEGATIONS OF ABUSE MADE AGAINST TEAM MEMBERS

Allegations against team members (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of the team, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of any educational facility.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the manager, or the Chair of governance team, where the manager is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the provision premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 53 of 87
---	--------------------------------------	------------------------------------	---------------



Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the provision so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the provision so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative site or other work for the organisation.

If in doubt, the case manager will seek views from the provision's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **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 to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 54 of 87
---	--------------------------------------	------------------------------------	-----------------------------



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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children’s social care services, where necessary). Where the police and/or local authority children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the provision is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children’s social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual’s family, they will discuss these concerns with the DSL and make a risk

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 55 of 87
---	--------------------------------------	------------------------------------	-----------------------------



assessment of the situation. If necessary, the DSL may make a referral to local authority children’s social care.

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the provision and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in provision and/or liaise with the police and/or local authority children’s social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the team member).
- Ensure home schools are updated and aware of investigations/concerns related to children/young people on their school roll.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 56 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the provision is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the provision will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the provision's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the provision, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The governance team will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the provision, while the provision carries out the investigation.
- We will involve the agency fully, but the provision will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 57 of 87
---	--------------------------------------	------------------------------------	---------------



Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the provision ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the provision will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the provision will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 58 of 87
---	--------------------------------------	------------------------------------	-----------------------------



The case manager will also consider how best to manage the individual’s contact with the child or children who made the allegation, if they are still attending the provision.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children’s social care may be appropriate.
- Shown to be deliberately invented, or malicious, the provision will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children’s social care may be appropriate.
- Shown to be deliberately invented, or malicious, the provision will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The provision will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children’s social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 59 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual’s confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual’s personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the provision will provide a copy to the individual, in agreement with local authority children’s social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 60 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the provision's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the team member
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the provision that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of the team, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 61 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Safeguarding concern or allegation from another member of the team
- Disclosure made by a child, parent or other adult within or outside the provision
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term ‘low-level’ concern is any concern – no matter how small – that an adult working in or on behalf of the provision may have acted in a way that:

- Is inconsistent with the team code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority Examples of such behaviour could include, but are not limited to:
 - Being overly friendly with children
 - Having favourites
 - Taking photographs of children on their mobile phone.
 - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
 - Humiliating children/young people.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all team members to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring team member’s 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.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 62 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Empowering team members to share any low-level concerns as per section 7.7 of this policy.
- Empowering team members to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the provision’s safeguarding system.

Responding to low-level concerns

If the concern is raised via a third party, the manager will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The manager will use the information collected to categorise the type of behaviour and determine any further action, in line with the provision’s code of conduct. The manager will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 63 of 87
---	--------------------------------------	------------------------------------	-----------------------------



from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.

- Retained at least until the individual leaves employment at the provision.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 64 of 87
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 4: SPECIFIC SAFEGUARDING ISSUES

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 65 of 87
---	--------------------------------------	------------------------------------	---------------



- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and seminudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort ‘real’ images

Financially motivated incidents

Financially motivated sexual extortion (often known as ‘sextortion’) is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person’s account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim’s bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 66 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 67 of 87
---	--------------------------------------	------------------------------------	---------------



We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the provision without a home school or without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points for single-rolled children/young people.

Team members will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a team member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Local Contextual Safeguarding Priorities

Safeguarding practice within Nova Newcastle Ltd Alternative Provision recognises the importance of understanding the local safeguarding context and emerging risks affecting children and young people.

The provision takes account of the strategic priorities identified within the Safe Newcastle Community Safety Partnership Plan (2022–2025). These priorities highlight key safeguarding risks that may impact children and young people both within Newcastle and in neighbouring areas from which our learners may travel.

As an alternative provision, Nova Newcastle Ltd recognises that children and young people may attend from a range of geographical areas and may therefore be exposed to differing local risks. Safeguarding practice must therefore remain alert to contextual safeguarding factors beyond the immediate locality of the provision.

The current Safe Newcastle priorities include:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 68 of 87
---	--------------------------------------	------------------------------------	---------------



- Reducing the impact of anti-social behaviour
- Reducing the harm and impact of drugs and alcohol
- Reducing domestic abuse and sexual violence
- Reducing hate crime and community tensions
- Tackling serious and organised crime
- Preventing radicalisation

These priorities inform the provision’s safeguarding practice, curriculum design, preventative education and partnership working.

The provision supports these priorities through proactive safeguarding measures, including:

- preventative education within the curriculum
- trauma-informed practice and relational approaches
- safeguarding awareness and contextual risk discussions
- partnership working with local safeguarding agencies and home schools
- the use of relational circles and structured discussion within the curriculum to explore issues such as safety, relationships, exploitation, discrimination, substance misuse and community responsibility.

Through these approaches, the provision aims to develop children and young people’s understanding of risk, promote resilience, and support them to make safe and informed choices.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 69 of 87
---	--------------------------------------	------------------------------------	-----------------------------



work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of the team suspects CCE, they will discuss this with the DSL and DSL of the home school. The DSL of the provision and home school will agree which will trigger the local safeguarding procedures, including a referral to the local authority’s children’s social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and noncontact sexual activity. It can also happen online. For example, young people may be persuaded or

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 70 of 87
---	--------------------------------------	------------------------------------	-----------------------------



forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of the team suspects CSE, they will discuss this with the DSL. The DSL will liaise with the home school and agree who will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of education. It can also take place both face-to-face and online and can occur simultaneously between the two.

Our provision has an alert, educational and curious approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is 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

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 71 of 87
---	--------------------------------------	------------------------------------	---------------



- 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 videos (also known as sexting or youth produced sexual imagery)
- 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
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If team members have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our provision’s approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn’t physical, as well as

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 72 of 87
---	--------------------------------------	------------------------------------	-----------------------------



witnessing the 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the provision (usually the designated safeguarding lead) before the child or children arrive at the provision the following day.

The DSL will provide support according to the child’s needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children’s social care.

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

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 73 of 87
---	--------------------------------------	------------------------------------	---------------



All forms of HBA are abuse and will be handled and escalated as such. All team members will be alert to the possibility of a child being at risk of HBA or already having suffered it. If team member's have a concern, they will speak to the DSL, who will liaise with the DSL of the home school and agree to activate local safeguarding procedures.

FGM

The DSL will make sure that team member's have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a team member discovers that an act of FGM appears to have been carried out or suspects that a child/young person is at risk of FGM.

Indicators that FGM has already occurred include:

- A child/young person confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out.
- A family/child already being known to social services in relation to other safeguarding issues.
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 74 of 87
---	--------------------------------------	------------------------------------	---------------



- Talking about pain or discomfort between her legs

Potential signs that a child/young person may be at risk of FGM include:

- The girl’s family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl’s community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 75 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Team members will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of the team suspects that a child/young person is being forced into marriage, they will speak to the child/young person about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- Speak to the child/young person about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk

Preventing radicalisation

- Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence
- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - o Negate or destroy the fundamental rights and freedoms of others; or
 - o Undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
 - o Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- Terrorism is an action that:
- Endangers or causes serious violence to a person/people;

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 76 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism 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.

Provisions have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our provision from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our children/young people to stay safe online at the provision and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Team member's will be alert to changes in children/young people's behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a child/young person is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 77 of 87
---	--------------------------------------	------------------------------------	---------------



- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour –team members should have confidence in their instincts and seek advice if something feels wrong.

If team members are concerned about a child/young person, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Team members should always take action if they are worried.

Further information on the provision’s measures to prevent radicalisation are set out in other provision policies and procedures, including our, relational and online safety policies.

Sexual violence and sexual harassment between children in education settings Sexual

violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same provision.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 78 of 87
---	--------------------------------------	------------------------------------	---------------



If a victim reports an incident, it is essential that team member's make sure they 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, team members will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the provision that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra team member training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or transgender (LGBT) children are at greater risk.

Team members should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (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.

If team members have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our provision's approach to this type of abuse.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 79 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from education
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

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

Team members will be aware of these indicators and risk factors. If a member of the team has a concern about a child/young person being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of team members and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in using VisitorSafe and wear a visitor's badge.

Visitors to the provision who are visiting for a professional purpose, such as educational psychologists and therapists will be asked to show photo ID and:

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 80 of 87
---	--------------------------------------	------------------------------------	-----------------------------



- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of the team at all times. We will not invite into the provision any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using provision facilities is not seeking to disseminate extremist views or radicalise children/young people or team members.

Non-collection of children/young people

If a child is not collected at the end of the session/day, the team member will contact the DSL who will contact the parents/carers and remain with the child until collection, the details will be recorded on CPOMs.

Missing children/young people

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

If a child is missing, the DSL and Manager will be immediately informed, The DSL will contact the parents/carers and home school (where applicable), contextual information will be considered by the DSL who will determine next steps (in collaboration with the home school, where applicable) including consideration of police notification, the details will be recorded on CPOMs, and risk assessments will be reviewed.

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 81 of 87
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 5: KEY CONTACT INFORMATION

Newcastle Children's Social Care Initial Response Team for advice and referrals during office hours.
Call 0191 277 2500

Newcastle Emergency Duty Team outside of office hours.
Call 0191 278 7878
Newcastle Multi-Agency Safeguarding Hub
01912773611 - mark.quinn@newcastle.gov.uk

Gateshead Children's Services for advice about referrals during office hours.
Call 0191 433 2653

Gateshead Emergency Duty Team outside of office hours.
Call 0191 477 0844

North Tyneside Children's Social Care Front Door
Call 0345 2000 109 (office hours) or 0330 333 7475 (evenings and weekends)

NSPCC (National Society for the Prevention of Cruelty to Children) 24 hour helpline, includes some Asian languages.
Call 0808 800 5000
NSPCC Whistleblowing Helpline – 08000280285

Northumbria Police Safeguarding Department offers advice.
Call 101 and ask for the Safeguarding Department.
Emergency: 999
Prevent - Prevent@newcastle.gov.uk
Anti-Terrorist Hotline – 0800789321

LADO - Melanie Scott - 0191 2772500 - LADO@Newcastle.gov.uk - melanie.scott@newcastle.gov.uk

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 82 of 87
---	--------------------------------------	------------------------------------	---------------



Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 83 of 87
---	--------------------------------------	------------------------------------	-----------------------------



Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 84 of 87
---	--------------------------------------	------------------------------------	-----------------------------



APPENDIX 6: EQUALITY IMPACT ASSESSMENT

The organisation aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the Equality Act 2010. Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies.

In an Alternative Provision setting, consideration must also be given to the impact of policies and practice on **children and young people**, many of whom may be vulnerable learners, have SEND, experience trauma, or be at increased risk of exclusion or discrimination.

Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies, including both **staff and pupils/learners**, parents/carers, and wider stakeholders.

Ref #	Question	Yes	Comments
		No	
		N/A	
1	Does the document/guidance affect one group less or more favourably than another on the basis of:	No	
	Age	No	
	Race/Ethnic origins (including Gypsy, Roma and Traveller)	No	
	Sex (man or woman)	No	
	Gender Reassignment	No	
	Pregnancy/Maternity	No	
	Religion or Belief	No	

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 85 of 87
---	--------------------------------------	------------------------------------	-----------------------------



	Sexual orientation including lesbian, gay and bisexual people	No	
	Marriage/Civil Partnership	No	
	Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
	Carers	No	
2	Is there any evidence that some groups are affected differently?	No	
3	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?	No	
4	Is the impact of the document/guidance likely to be negative?	No	
5	If so, can the impact be avoided?	N/A	
6	What alternative is there to achieving the document/guidance without the impact?	N/A	
7	Can we reduce the impact by taking different action?	N/A	
8	Does this policy impact pupils with SEND, SEMH needs or Education, Health and Care Plans (EHCPs)?	No	
9	Could this policy lead to disproportionate behaviour sanctions, exclusions or barriers to reintegration for any protected group?	No	
10	Does this policy ensure reasonable adjustments are made so disabled pupils and staff can access education, support and services fairly?	Yes	

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 86 of 87
---	--------------------------------------	------------------------------------	---------------



11	Does this policy promote inclusion and belonging for pupils who may experience discrimination, bullying or peer-on-peer abuse linked to protected characteristics?	Yes	
12	Does this policy support safeguarding duties, including protection from discriminatory bullying, online harassment and peer-on-peer abuse?	Yes	
13	Are there any barriers for parents/carers from diverse backgrounds (e.g., language, culture, disability) in accessing information or engaging with the organisation?	No	
14	Does this policy promote equality of opportunity in curriculum access, support planning and learner voice?	Yes	
15	Have pupils' individual vulnerabilities been considered, including those who are Looked After, Previously Looked After, or known to social care?	Yes	

For advice in respect of answering the above questions, or if a potential discriminatory impact has been identified, please contact the Designated Safeguarding Lead (DSL) or Equality and Diversity Lead.

Names and Organisation of Individuals who carried out the Assessment: Please give contact details.	Date of the Assessment
Name & Job Title: Rhea Marwaha, Director	15.04.2026

Policy Title: Child Protection and Safeguarding Policy (including safer recruitment, allegations against team members and low-level concerns)	Current Approved Date: 15.04.2026	Date of Next Review: 14.04.2029	Page 87 of 87
---	--------------------------------------	------------------------------------	---------------