



# ABLE Education Policy Document

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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## Definitions

The definitions given below are used for the purpose of this policy.

**Child:** a person under the age of 18.

**Child protection:** the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

**Consent:** permission given by someone with the freedom and capacity to do so.

**DSL:** Designated Safeguarding Lead.

**Extra familial Harm - Contextual Safeguarding:** the idea that wider environmental factors in a child's life may be a threat to their safety and/or welfare and safeguarding measures need to address these.

**LADO:** Local Authority Designated Officer

**Parent:** a birth parent or other adult in a parenting role. For example, a step-parent, foster carer, or adoptive parent.

**Safeguarding:** promoting the welfare of children by:

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

**Sexual harassment:** unwanted conduct of a sexual nature that can occur both online and offline.

**Sexual violence:** offences under the Sexual Offences Act 2003<sup>1</sup>. This includes rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.

**Staff:** anyone working for or on behalf of the provision, full time or part-time, temporary, or permanent, in either a paid or voluntary capacity.

**Up skirting:** as captured in the Voyeurism (Offences) Act 2019<sup>2</sup>, this is the act of placing equipment such as a camera or mobile under a person's clothing without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress, or alarm.

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<sup>1</sup> [Sexual Offences Act 2003](#)

<sup>2</sup> [Voyeurism | The Crown Prosecution Service](#)

## Purpose

ABLE Education is committed to ensuring a safe learning environment for all its learners and minimising the risk of all types of harm to them. We will work closely with the appropriate organisations to respond to any identified safeguarding concerns.

All who work with ABLE are expected to share this commitment. Adults in our provision take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

This document forms part of the integrated safeguarding and child protection portfolio that should be read alongside:

- Local Arrangements for Safeguarding, Nottingham City Council's Safeguarding Children Partnership<sup>3</sup> and in particular [NCSCP Working Arrangements 2024 - 2025](#)<sup>4</sup>
- Keeping Children Safe in Education (September 2025)<sup>5</sup>
- Working Together to Safeguard Children (December 2023)<sup>6</sup>
- The Children Act 1989<sup>7</sup> and 2004<sup>8</sup>.
- The Children and Social Work Act 2017<sup>9</sup>
- The Education Act 2011<sup>10</sup>
- ABLE Education's other policies (see website<sup>11</sup>), including the:
  - ▷ Behaviour Policy
  - ▷ Health and Safety Policy
  - ▷ IT and E-Safety Policy
  - ▷ Lone Working Policy
  - ▷ Managing Allegations against Staff Policy
  - ▷ Remote Learning Policy
  - ▷ Safer Recruitment Policy
  - ▷ Whistleblowing Policy

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<sup>3</sup> [Safeguarding Children Partnership - Nottingham City Council](#)

<sup>4</sup> <https://www.nottinghamcity.gov.uk/media/kln4ovf/ncscp-working-arrangements-2024-2025.pdf>

<sup>5</sup> [Keeping children safe in education](#)

<sup>6</sup> <https://www.gov.uk/government/consultations/working-together-to-safeguard-children-changes-to-statutory-guidance/guide-for-children-and-young-people-working-together-to-safeguard-children>

<sup>7</sup> [Children Act 1989](#)

<sup>8</sup> [Children Act 2004](#)

<sup>9</sup> [Children and Social Work Act 2017](#)

<sup>10</sup> [Education Act 2011](#)

<sup>11</sup> <https://able-education.co.uk/policies>

This document will be revised annually or whenever there has been an update to any of the above. The latest version can be found at <https://able-education.co.uk/policies> along with other policies of ABLE Education, where all staff, students, parents and commissioners can access them.

## Contact Details of Key Staff and Organisations

### ABLE Education contact details

Role	Contact details
Director and Head of Provision	Johanna Imade ( <a href="mailto:johanna@able-education.co.uk">johanna@able-education.co.uk</a> )
Designated Safeguarding Lead	Johanna Imade ( <a href="mailto:safeguarding@able-education.co.uk">safeguarding@able-education.co.uk</a> )
E-Safety Lead	Johanna Imade ( <a href="mailto:safeguarding@able-education.co.uk">safeguarding@able-education.co.uk</a> )
Prevent Duty Lead	Johanna Imade ( <a href="mailto:safeguarding@able-education.co.uk">safeguarding@able-education.co.uk</a> )
Designated Teacher for Looked After and Previously Looked After Children	Johanna Imade ( <a href="mailto:johanna@able-education.co.uk">johanna@able-education.co.uk</a> )
All the above can be contacted via the office phone line: 07396 803 303	

### Contact details of other organisations

Organisation	Contact Details
City MASH	0115 8764800 <a href="mailto:CityMASH@nottinghamcity.gov.uk">CityMASH@nottinghamcity.gov.uk</a>
The Local Authority Designated Officer (LADO)	0115 8764762 <a href="mailto:LADO@nottinghamcity.gov.uk">LADO@nottinghamcity.gov.uk</a> <a href="https://www.nottinghamcity.gov.uk/lado">https://www.nottinghamcity.gov.uk/lado</a>
Nottingham City Safeguarding Children Partnership	0115 876 4762 <a href="mailto:safeguarding.partnerships@nottinghamcity.gov.uk">safeguarding.partnerships@nottinghamcity.gov.uk</a>
Nottinghamshire Safeguarding Children Partnership	0115 977 3935 <a href="https://nscp.nottinghamshire.gov.uk/">https://nscp.nottinghamshire.gov.uk/</a>
NSPCC Whistleblowing Advice Line	0800 028 0285

## Staff Roles

### Designated Safeguarding Lead (DSL)

ABLE Education's DSL is Johanna Imade, the Head of Provision and Director. The DSL:

- is a senior member of staff from the provision's leadership team possessing the authority to conduct the duties of the post, including committing resources and supporting and directing other staff
- is appropriately trained, with regular updates
- acts as a source of support and expertise to the ABLE Education community.
- has a working knowledge of local procedures and acts as a point of contact with the safeguarding partners
- makes staff aware of training courses and the latest policies on safeguarding.
- keeps detailed written records of all concerns
- refers cases of suspected abuse to children's social care or the police as appropriate
- ensures that when a pupil leaves the provision, their child protection file is passed to their new setting (separately from the main pupil file, ensuring secure transit) and confirmation of receipt is obtained
- attends and/or contributes to child protection conferences
- coordinates the school's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies, including the Local Safeguarding Partnership
- ensures that the child protection policy and procedures are reviewed and updated annually
- makes the child protection policy available publicly on the ABLE Education website

During term time, the DSL will always be available (during school hours) for staff in the provision to discuss any safeguarding concerns<sup>12</sup>.

ABLE Education will ensure that adequate and appropriate cover arrangements are in place for any out of hours/out of term activities.

The role of the Designated Safeguarding Lead is clear within the post holder's job description.

### The Head of Provision

The Head of Provision is Johanna Imade, the Director of ABLE Education. They will

- ensure that the Safeguarding and Child Protection Policy and procedures are understood and implemented by all staff

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<sup>12</sup> In exceptional circumstances, availability could mean via phone and or video call or other such media

- allocate sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other meetings as required
- support the designated teacher for looked after (and previously looked after) children to promote the educational achievement of any pupils who are looked after by the local authority and who have left care through adoption, special guardianship or child arrangement orders, or who were adopted from state care outside England and Wales
- ensure that all staff have the skills, knowledge and understanding necessary to keep looked after and previously looked after children safe
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures
- ensure that the culture of the provision supports effective pastoral care and early help
- ensure that staff do everything they can to support social workers when Children's Social Care becomes involved
- ensure that pupils are provided with opportunities throughout the curriculum to learn about safeguarding and how to always keep themselves safe, including when online, as part of a broad and balanced curriculum
- refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Local Authority Designated Officer (LADO) within one working day and before any internal investigation
- ensure that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the LADO
- ensure that relevant staff are made aware of disqualification under the Childcare Act 2006 and their obligations to disclose relevant information

## Managing Allegations against Staff or Volunteers

This policy outlines the procedure for managing allegations of misconduct or inappropriate behaviour made against staff, volunteers, contractors, or other individuals who work with children and young people at **ABLE Education**. Our primary aim is to ensure that all concerns are dealt with swiftly, fairly and consistently, whilst ensuring the safety and welfare of the children and young people in our care. We are committed to maintaining high standards of professional behaviour and ensuring that any allegations are investigated thoroughly and impartially, in line with legal and regulatory requirements.

The aim of this policy is to:

- Ensure that allegations against staff, volunteers, and other individuals are handled fairly, consistently, and in a timely manner
- Protect children and young people from potential harm
- Safeguard the rights of staff members accused of misconduct
- Fulfil our statutory responsibilities under the **Keeping Children Safe in Education (KCSIE)**<sup>13</sup> guidance and relevant legislation

This policy applies to all staff employed at **ABLE Education**, including:

- Tutoring staff
- Support staff
- Volunteers
- Contractors
- Any other individuals working with children within the setting

This policy covers allegations of any behaviour that may have harmed a child, put a child at risk of harm, or may constitute misconduct or criminal offences in relation to children and young people.

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[https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping\\_children\\_safe\\_in\\_education\\_2024.pdf](https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf)

## Types of Allegations

Allegations that may be raised against staff include, but are not limited to:

- Physical abuse (e.g., hitting, excessive use of force)
- Emotional abuse (e.g., belittling, humiliating, or threatening behaviour)
- Sexual abuse (e.g., inappropriate touching, grooming, or sexual assault)
- Neglect (e.g., failure to provide basic care, food, or supervision)
- Bullying, discrimination, or harassment
- Any other behaviour that could be considered inappropriate or a breach of professional boundaries

## Procedure for managing allegations

### Initial response to an allegation

- **Immediate action:** if the allegation involves an immediate risk to a child, the member of staff receiving the allegation must act swiftly to protect the child by reporting the concern to the **Designated Safeguarding Lead (DSL)**. In cases of emergency, the police should be contacted.
- **Ensure the child's safety:** the first priority must always be the safety and welfare of the child. If necessary, the staff member accused of the allegation should be removed from direct contact with children immediately, pending further investigation.
- **Record the allegation:** a detailed written record of the allegation should be made immediately by the individual receiving the concern, including the time, date, location, and the nature of the allegation. This should be done in a factual manner without speculating on the outcome of the allegation.
- **Report the allegation:** the **Designated Safeguarding Lead (DSL)/Head of Provision** should be informed immediately to ensure that the allegation is investigated appropriately and following the proper channels.

### Referral to Local Authority Designated Officer (LADO)

Any allegations against a member of staff will be immediately referred by the DSL to the **Local Authority Designated Officer (LADO)**<sup>14</sup>. This should happen within one working day of the allegation being made, as required by statutory guidance.

- The **LADO** is responsible for overseeing the investigation and ensuring that all actions are carried out in line with local safeguarding procedures.
- The **LADO** will help to assess the nature, validity, and seriousness of the allegation and provide advice on the appropriate course of action.

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<sup>14</sup> <https://www.nottinghamcity.gov.uk/lado>

- If the allegation suggests that a criminal offence may have been committed, the LADO will work with the police to ensure that the appropriate criminal investigation is carried out.

### Internal investigation and support

While the LADO oversees the process, **ABLE Education** will conduct its own internal investigation in cooperation with the LADO, the police (if applicable), and any other relevant agencies. The investigation process will include:

- **Suspension:** the accused staff member may be suspended, depending on the nature of the allegation and whether this is necessary to protect the child or ensure the integrity of the investigation. Suspension should only be used when absolutely necessary and as a last resort. Alternative arrangements (such as temporary reassignment of duties) may be considered.
- **Support for the accused:** the accused staff member will be informed of the allegation as soon as possible and given the opportunity to respond. They will be treated with fairness and respect throughout the process. The provision will offer support, such as assistance on how to access a counsellor or occupational health services, if necessary.
- **Support for the complainant:** the child or young person making the allegation will be supported throughout the process. The DSL will take steps to ensure that the child is not re-traumatized or further harmed during the investigation. Parents or guardians should be informed as appropriate and kept updated on the process.

### Decision-making process

Once the investigation is complete, a decision will be made based on the evidence gathered. The following actions may be taken:

- **Unfounded allegations:** If the allegation is found to be unfounded, the staff member will be reinstated and supported in returning to their role. A full record of the investigation and decision will be kept.
- **Substantiated allegations:** If the allegation is substantiated, the appropriate disciplinary procedures will be followed, which may include dismissal and/or referral to professional bodies, dependent on the staff member's role. In serious cases, the police may be involved, and criminal charges may be pursued.
- **Partially substantiated or unclear allegations:** If the evidence is inconclusive or only partially substantiates the allegation, the provision will work with the LADO to determine the next steps. These could include additional monitoring of the staff member, further training or changes to their role.

### Referral to regulatory bodies

If the allegation is substantiated and involves a serious breach of professional conduct, the provision will refer the staff member to the appropriate regulatory body (for instance the Teaching Regulation Agency, HCPC, or GMC) and the Disclosure and Barring Service (DBS) to prevent them from working with children in the future.

## Record-keeping and Confidentiality

- All records related to allegations must be stored securely and treated with the utmost confidentiality. Access to these records will be restricted to those involved in the investigation and decision-making process.
- The accused staff member's record will include details of the allegation, the investigation process, the findings, and the outcome.
- Records must be kept for at least **six years** after the incident, or for a period of time required by other relevant guidelines or legal requirements.

## Support for all Parties Involved

- **For the complainant:** the child or young person who made the allegation will be supported throughout the process by the DSL or an external support service, if required.
- **For the accused:** the staff member accused of misconduct will be treated fairly and in accordance with their employment contract. They will be provided with support throughout the process, including assistance on how to access legal advice, if necessary.

## Training and Awareness

- The leadership of the provision will ensure that any learning arising from any investigations are incorporated into future training or policy changes.
- All staff will receive regular safeguarding and child protection training, including coverage of how to manage allegations against staff.
- The provision will ensure that all staff are aware of the procedures outlined in this policy, understand their responsibilities in safeguarding children, and are trained to respond appropriately to any concerns or allegations.

The full procedures for dealing with allegations against staff (including low-level concerns) can be found in ABLE Education's Managing Allegations against Staff Policy. These will be followed when a concern or allegation meets the harm threshold. This is when the allegation indicates a member of staff or volunteer has:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes transferable risk (behaviour outside of the provision that may make an individual unsuitable to work with children)

A referral will be made to the Local Authority Designated Officer (LADO)<sup>15</sup>, without delay.

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<sup>15</sup> Contact details can be found in the "Contact details of other organisations" section of this policy.

The Head of Provision will lead an investigation. Where the Head of Provision is the subject of an allegation, a direct referral to the LADO should be made as detailed in the section of this document below entitled “Allegations or low-level concerns relating to the Head of Provision”.

### **Allegations that meet the harm threshold for a referral to the Designated Officer (LADO)**

Whilst allegations or concerns are being investigated, the member of staff in question will be suspended from working for ABLE until the investigation has concluded.

As part of ABLE’s approach to safeguarding, we promote an open and transparent culture in which any concerns about adults working in or on behalf of the provision (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

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

- being over-friendly with children
- displaying favouritism
- taking photographs of children on personal devices
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate, sexualised, intimidating or offensive language

Staff will share, without delay, low-level concerns about a member of staff with a member of senior management.

Staff will share, without delay, any allegations/concerns that meet the harm threshold for a referral to the LADO with the Head of Provision:

Name	Role	Email
Johanna Imade	Head of Provision	johanna@able-education.co.uk

### **Allegations or low-level concerns relating to the Head of Provision**

If the allegation or concern relates to the Head of Provision it should be reported, without delay, to the LADO:

Name	Contact Number
LADO	0115 8764762 <a href="mailto:LADO@nottinghamcity.gov.uk">LADO@nottinghamcity.gov.uk</a> <a href="https://www.nottinghamcity.gov.uk/lado">https://www.nottinghamcity.gov.uk/lado</a>

## Staff Training

All staff will receive training to enable them to recognise possible signs of abuse, neglect, and exploitation and to know what to do if they have a concern.

Staff will all undertake training each September, or when they onboard, covering the below as a minimum:

- Signs and symptoms of abuse and neglect (including online safety)
- Local procedures for responding to concerns
- The provision's behaviour policy
- Response to children that go missing in education
- The staff code of conduct
- E-Safety
- Allegations management
- Responding to peer-on-peer abuse

The DSL (and Deputy where there is one) will attend training for newly appointed DSL's and refresher training every two years. That training will include up-to-date information about local safeguarding partnership inter-agency procedures.

In addition, the DSL will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, looked after children, previously looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, child on child abuse, sexual harassment and sexual violence in school, extremism, female genital mutilation and forced marriage. All members of staff will receive training in relation to keeping children safe online.

### **How and when new staff and volunteers are informed of the providers' requirements for safeguarding**

All new staff and volunteers are informed of the providers' requirements for safeguarding at the start of the application process within the job advert/job description/person specification, are asked a safeguarding question during the job interview and then are provided with further information during the induction period.

Staff must complete an induction process before working with young people. During the induction, they are expected to read part one of Keeping Children Safe in Education (2024), Working Together to Safeguard Children (2023), What to do if you are worried a child is being abused? (2015) and this Safeguarding and Child Protection Policy. They are given the opportunity to ask any questions with regards to the duties they have been presented with in regards to safeguarding and child protection before being asked to sign to confirm that they have read and understood these and other related documents on a Declaration of Receipt and Understanding form.

### **Promoting safeguarding information to ensure staff are updated regularly**

In addition to the training that staff are required to undergo annually, ABLE Education will provide staff with any updates in safeguarding policies and procedures via email.

Any team meetings will devote part of the agenda to safeguarding issues and minutes from each meeting will be kept on record and provided to any absent members of staff.

A culture of safeguarding awareness will be fostered through periodic reminders and tips to strengthen practice in relation to child protection and safeguarding.

## Safer recruitment

ABLE Education complies with the requirements of Keeping Children Safe in Education (DfE, 2024) and the Local Safeguarding Partnership (LSP) by carrying out the required checks and verifying the applicant's identity, qualifications, and work history.

- At least one member of each recruitment panel will have completed safer recruitment training
- ABLE obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the provision have been appropriately checked
- Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained
- ABLE maintains a single central record (SCR) of recruitment checks undertaken

Senior Management will ensure that relevant staff are made aware of disqualification under the Childcare Act 2006 and their obligations to disclose relevant information.

Staff are asked if their DBS status has changed whenever there is a significant life event that could potentially impact their criminal record, such as a change in address, a new conviction, or when their current DBS check is due for a regular review. All staff are required to be on the DBS Update Service, which allows us to monitor this consistently and automatically alerts us if their DBS status changes. We may also request regular DBS status checks, even if the employee is on the Update Service.

For more information, please refer to the ABLE Education Safer Recruitment Policy.

## The Single Central Record

ABLE Education's Single Central Record covers the following people: all staff, third-party supply staff and volunteers.

Our Single Central Record provides a clear and comprehensive database to any persons or organisations authorised to review the information it holds, such as representatives of regulating bodies.

## Storage and transportation of child protection and safeguarding information

At ABLE Education, all child protection and safeguarding notes/information are kept in a secure folder, which requires a password to access. We also protect our data using cyber security practices such as using strong passwords and enabling two-factor authentication on our systems.

Our e-mail platform is designed with a robust set of security features to ensure confidentiality and integrity of our internal and external communications, these include:

- Active activity monitoring that uses machine learning and threat data to ensure any suspicious activity is detected and mitigated in real time.

- Secure encryption protocols ensure that emails are sent and received in an encrypted format, further safeguarding information during transmission.
- E-mail authentication methods which verify the original of e-mails to ensure that they are sent from the claimed domains protecting our data from e-mail spoofing.

### **Sharing confidential information with the home school**

All confidential information that is shared electronically with the home school will be through encrypted/passworded files attached to emails that do not including any sensitive information within the body of an email and address the students only by their with initials. Any physical documents will be store within an opaque folder and transported to the school directly.

### **Transferring child protection records back to the home school**

Child Protection records that are transferred back to the home school when the placement ends will be done so through encrypted/passworded files attached to emails that do not including any sensitive information within the body of an email and address the students only by their with initials. Any physical documents will be store within an opaque folder and transported to the school directly.

## **Teaching our pupils about safeguarding**

At ABLE Education pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities. Children are taught to recognise when they are at risk and how to get help when they need it.

We will teach pupils to keep safe ahead of particular activities they engage with. For example, ahead of the use of online resources, potential risks will be shared with students in an age-appropriate manner alongside how they can protect themselves from these risks. Please see ABLE's IT and E-Safety Policy for further details.

## **Educational Outcomes**

The DSL and Head of Provision is responsible for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school. This includes:

- keeping an updated register of the cohort of children who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

## **Extra-familial harms (Contextual Safeguarding)**

ABLE Education assesses the risks and issues in the wider community when considering the wellbeing and safety of its pupils. As a provision, we have contextual concerns that are shared with other settings, such as sexual exploitation, online safety concerns or criminal exploitation. However, due to the outreach nature of our provision, there are also unique community concerns that we consider and address with our students.

## Child Protection Procedures

### Children and Young People who may be particularly vulnerable

Some children face an increased risk of abuse. Many factors can contribute to this, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To work towards our pupils being equally protected, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence, or parental mental health needs
- asylum seekers
- living away from home
- living transient lifestyles
- living in temporary accommodation
- homeless
- vulnerable to being bullied or engaging in bullying
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- within the court system
- have a family member in prison
- at risk of criminal exploitation
- at risk of being drawn into extremism

This list provides examples of particularly vulnerable groups and is not exhaustive.

Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with additional communication needs.

### Actions taken to identify students who are at risk from harm or are vulnerable

The staff at ABLE Education actively observe student behaviour, monitor academic performance, engage with students through open communication, and maintain collaborative relationships with parents and caregivers, looking for potential signs like significant behavioural changes, unexplained absences, physical signs of abuse, emotional distress, declining academic performance, social isolation, or changes in personal hygiene; if concerns arise, they should follow established reporting procedures to access necessary support services.

Some key actions include:

- Regular observation: paying close attention to student behaviour in sessions, during transitions, and at play, noting any unusual or concerning patterns.
- Academic monitoring: tracking student progress in academics, identifying sudden drops in grades or performance that could indicate underlying issues.
- Open communication: establishing a safe space for students to openly discuss their experiences and concerns with tutors.
- Parent/Guardian contact: maintaining regular communication with parents/guardians, actively seeking feedback on any potential issues at home.
- Peer reporting: encouraging students to report concerns they may have about their peers if they suspect potential harm.

Some potential indicators of a student at risk:

- Behavioural changes: Sudden aggression, withdrawal, excessive anxiety, disruptive behaviour, or changes in mood.
- Physical signs: Unexplained bruises, injuries, or neglectful appearance
- Changes in attendance: Frequent absences or tardiness without explanation
- Social isolation: Difficulty forming relationships with peers or withdrawing from social activities
- Emotional distress: Expressing feelings of sadness, hopelessness, or suicidal thoughts
- Changes in hygiene: Neglecting personal hygiene practices
- Reporting procedures:
- Immediate action:
- If a student is in immediate danger, contact emergency services immediately.

Internal reporting:

- Following the safeguarding procedure laid out in this document to report concerns and collaborate with the relevant outside agencies.

## **Recognising abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. They can be the result of inflicting harm, for example, through violence, or by failing to act to prevent harm, for example, by leaving a small child at home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE, 2024) refers to four categories of abuse. These are set out in Appendix 1, along with the indicators of abuse.

## **Specific Safeguarding and Child Protection Issues**

## Children missing education

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

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

We will always follow up with parents/carers when pupils are not in attendance. Hence, we require up-to-date contact numbers for at least two parents/carers.

Parents are asked to update the provision as soon as possible if their contact details change.

In response to the guidance in Keeping Children Safe in Education (2024) the provision has ensured that:

- staff are aware of the steps to take when children do not attend regularly
- appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions) are in place
- procedures are in place to ensure that we inform the local authority when we plan to take pupils off-roll or when they:
  - ▶ leave school to be home educated
  - ▶ move away from the school's location
  - ▶ remain medically unfit beyond compulsory school age
  - ▶ are in custody for four months or more (and will not return to school afterwards); or
  - ▶ are permanently excluded

Where pupils are expected to attend the provision, but fail to take up their place, they will be referred to the local authority.

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

## Sexual violence and sexual harassment, including child-on-child abuse

ABLE Education takes any kind of sexual violence and sexual harassment, including peer-on-peer abuse, very seriously. We understand the importance that any incidents are dealt with immediately and effectively, calling upon the appropriate authorities for assistance.

At ABLE Education we believe that all children have the right to attend an educational setting and learn in a safe environment. Sexual violence and sexual harassment are never acceptable, and it will not be tolerated at ABLE Education. We take the position that sexual harassment and online sexual abuse are a problem in our community and beyond our provision. As such, we will act proactively in addressing this form of abuse.

Measures will be taken to ensure all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward. They will be supported and actions taken to keep them safe.

Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of their school or college staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

ABLE Education recognises that how the provision responds to a report can build or undermine the confidence of future victims of sexual violence and sexual harassment to make a report.

Staff are reminded that it is important to note that children may not find it easy to tell staff about their abuse verbally and if there is any concern about a child's welfare, staff should act without hesitation.

It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

### Child-on-child abuse

ABLE Education recognises that children may become victims of abuse from other children (referred to as child-on-child or peer-on-peer abuse). Staff will be made aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This could include, but is not limited, to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- gender-based violence
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes, sexting and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- up skirting
- initiation/hazing type violence and rituals

Staff will report instances of peer-on-peer abuse, sexual violence and harassment through the normal safeguarding concern process and recognise that support must be provided to both the alleged victim and alleged abuser.

When we receive a report of peer-on-peer abuse, we will follow the principles as set out in part five of Keeping Children Safe in Education (2024) and of those outlined within this Safeguarding Child Protection Policy. The following actions will be taken:

- We will listen to and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person
- Statements will be sought from both the alleged victim and the alleged perpetrator, and everything possible will be done within the new context to establish the most accurate version of events
- Unless there is an exceptional reason not to engage parents, they will be contacted, and the situation explained
- Support will be offered to both the alleged victim and the alleged perpetrator, and consequences will be considered where appropriate in line with our behaviour policy

- Where appropriate, we will seek to support the pupils in understanding each other's point of view and offer additional sessions (face-to-face or remotely as required) to help them to overcome their situation
- The process and outcomes will be recorded on ABLE Education's safeguarding systems and appropriate, timely referrals made as the need arises during the process. The process will be overseen by the DSL, although other colleagues may support the process
- We will continue to address the pupils' concerns as far as possible and work towards a resolution to address their concerns. The provision will agree with the pupils on how often they feel able to review the situation, with a maximum monthly frequency.
- Where all involved agree that the issues have been resolved, the case will remain open for a further six weeks. This allows staff to seek pupil voice after a reasonable time has passed to ensure that the issues have not resurfaced, or to seek to offer support if they have

If a report is determined to be unsubstantiated, unfounded, false, or malicious, the DSL will consider whether the person who has made the allegation needs help or may have been abused by someone else, and this is a cry for help. In such circumstances, the DSL will consider if a referral to children's social care may be appropriate. It will also be considered whether any disciplinary action is appropriate against the individual who made the false allegation, in line with the Behaviour Policy.

All decisions will be made on a case-by-case basis, led by the DSL (or a deputy) using their professional judgement and supported by external agencies, such as children's social care and the police, as required.

All concerns, discussions and decisions made and the reasons for those decisions will be recorded on ABLE's safeguarding systems.

### **Children with sexually harmful behaviour**

Young people who display such behaviour may be victims of abuse themselves, and the child protection procedures will be followed for both victim and perpetrator accordingly. Staff who become concerned about a pupil's sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as "sexting" or "youth produced sexual imagery") can be a type of harmful sexual behaviour.

In cases of sexting, we follow the guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) first published in 2017, updated in 2024: "Sharing nudes and semi-nudes: how to respond to an incident"<sup>16</sup>.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts for crimes committed against them or they have witnessed. The families of children may also be subject to child arrangement processes through the family court system.

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<sup>16</sup> [Sharing nudes and semi-nudes: how to respond to an incident](#)

We recognise that both circumstances may be stressful for children, and appropriate support will be provided in line with local and national guidance.

### **Child sexual exploitation**

Sexual exploitation involves an adult or group of adults taking advantage of the vulnerability of an individual child/young person or groups of children/young people. Victims can be of either sex. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship so doesn't see themselves as a victim. The child may initially resent intervention by staff as they perceive it to be interference. However, staff must act on their concerns, as they would with any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL. The DSL will then follow the Nottingham City Council's Multi-Agency Child Sexual Exploitation Procedure as set out in Appendix 4.

### **Criminal exploitation of children and county lines**

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into engaging in criminal activity. This could be:

- in exchange for something the victim needs or wants, and/or
- for financial gain or other advantage of the perpetrator or facilitator and/or
- through violence or the threat of violence

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can occur through the use of technology.

County lines is the police term for urban gangs supplying drugs to suburban areas, market and coastal towns using dedicated mobile phone lines or "deal lines". It involves CCE as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'.

County lines activity is associated with violence, drug dealing, exploitation and has a devastating impact on young people, vulnerable adults and local communities.

ABLE's staff are aware of the need to share any concerns regarding children that may be involved in or at particular risk of involvement in CCE with the DSL.

### **Honour-based abuse**

'Honour-based' abuse (HBA) encompasses crimes that have been committed to protect or defend the honour of the family and/or the community. It includes female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

A forced marriage is a marriage in which an individual is coerced into a marriage against their will. Forms of coercion used may include physical, psychological, financial, sexual, and emotional pressure. In England and Wales, this practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014<sup>17</sup>.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, the families of both spouses take a leading role in arranging the marriage whilst the choice of whether to accept the arrangement remains with the prospective spouses.

In forced marriages, children may be married at a very young age and well below the age of consent in England. ABLE's staff receive training on this and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

### Female Genital Mutilation (FGM)

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so the provision's staff are trained to be aware of risk indicators. Many of such procedures are carried out abroad, so staff should be particularly alert to suspicions or concerns expressed by a female pupil about going on a long holiday during the summer vacation period.

**Tutors have a mandatory duty to personally report to the police** when they:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18

This should be done as soon as possible, **within 24 hours** of the case being discovered. The full procedure for making a report can be found in "Mandatory reporting of female genital mutilation: procedural information" (2020)<sup>18</sup>. It is recommended that tutors make a **report orally** by calling **101**, the single non-emergency number. The DSL should also be informed, so that they can make a report to social care and consider that wider concerns for the child or young person. This will also enable the provision to support the reporting staff member through this process.

### Radicalisation and Extremism

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<sup>17</sup> [Anti-social Behaviour, Crime and Policing Act 2014](#)

<sup>18</sup> [https://assets.publishing.service.gov.uk/media/5a8086f2ed915d74e33faefc/FGM\\_Mandatory\\_Reporting\\_-\\_procedural\\_information\\_nov16\\_FINAL.pdf](https://assets.publishing.service.gov.uk/media/5a8086f2ed915d74e33faefc/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf)

As part of the Counter-Terrorism and Security Act 2015<sup>19</sup>, schools have a duty to “prevent people being drawn into terrorism”. This has become known as the “Prevent Duty”<sup>20</sup>.

ABLE’s staff receive training to help to identify signs of extremism. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

Staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes, and networks that young people can come across online, so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race, or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

### **Children with family members in prison**

Children who have family members that have been sent to prison are at risk of poor outcomes, including poverty, stigma, isolation, and poor mental health. ABLE recognises that these children will need support. This will be provided in line with guidance from local agencies and the National Information Centre on Children of Offenders (NICCO)<sup>21</sup>.

### **Domestic abuse**

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or

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<sup>19</sup> [Counter-Terrorism and Security Act](#)

<sup>20</sup> [Prevent duty guidance: England and Wales \(2023\)](#)

<sup>21</sup> [NICCO](#)

may have had to leave the family home as a result. Domestic abuse affecting young people can occur within their own relationships in addition to within their family home.

ABLE Education is an Operation Encompass<sup>22</sup> provision. Operation Encompass helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) in their educational setting before the child or children arrive the following day. This ensures that the education provider has up-to-date relevant information about the child's circumstances and can put immediate support in place.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or education provider will make a referral to children's social care if they are concerned about a child's welfare.

### **Homelessness**

Being homeless, or at risk of becoming homeless, presents a real risk to a child's welfare. In most cases, staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis.

The DSL will be able to support pupils and their families facing homelessness by signposting them to appropriate agencies and support networks within the locality.

### **Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL. The provision will then notify the local authority of the circumstances.

### **Looked after (and previously looked after) children**

Children are most commonly looked after as a result of abuse or neglect.

The provision ensures that staff have been provided with training that builds their skills and understanding to help keep looked after children safe. Appropriate staff members have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the body looking after the child.

The Designated Teacher for Looked After Children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

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<sup>22</sup> [Operation Encompass](#)

The Designated Teacher for Looked After and Previously Looked After Children is Johanna Imade.

## Children's Mental Health

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

Safeguarding teams will never attempt to make a diagnosis of a mental health problem, but will work closely with appropriately trained professionals to support young people. However, ABLE Education recognises that staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Abuse or other potentially traumatic adverse childhood experiences can leave a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, reporting the concern on ABLE Education's designated safeguarding email at [safeguarding@able-education.co.uk](mailto:safeguarding@able-education.co.uk) and speaking to the DSL.

Staff should be aware of the document: "Mental Health and Behaviour in Schools"<sup>23</sup>. Also, Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people. This includes its guidance "Promoting Children and Young People's Emotional Health and Wellbeing"<sup>24</sup>.

The DfE's guidance on mental health and behaviour in schools sets out how mental health issues can bring about changes in a young person's behaviour or emotional state. These can be displayed in a variety of manners, all of which could be an indication of an underlying problem. Examples include being fearful or withdrawn, aggressive or oppositional, or excessive clinginess.

We will refer to the government's guidance and seek support from local partners for assistance in identifying pupils who might benefit from additional support.

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<sup>23</sup> [Mental health and behaviour in schools - GOV.UK](#)

<sup>24</sup> [Promoting children and young people's mental health and wellbeing A whole school or college approach](#)

## Online safety during face-to-face sessions

When students use a Nottingham City public library network to access the internet, they are protected from inappropriate content through the filtering and monitoring systems. Before any computer session can commence, participating staff and students must adhere to the library's computer access policy which closely aligns with the policies in ABLE Education's IT Policy. Computers and activity are monitored and content filters are also applied.

Similarly, all devices provided by ABLE Education will be configured with web filtering software to restrict access to categories of websites deemed inappropriate for minors. Filtering categories will include, but not be limited to:

- Adult content (pornography)
- Violence and gore
- Gambling
- Hate speech and extremist content
- Substance abuse
- Online gaming and entertainment (unless explicitly allowed for educational purposes)
- Social media platforms
- Malware, phishing, and harmful websites

Many students will also have access to the internet through their private mobile phone or other devices, which are beyond the control of the provision. Students will be encouraged to use the monitored devices. In all instances of technology use, there will be appropriate supervision by the tutor. As with all other activities, they will be watchful for signs a child may be at risk and respond in line with the guidelines set out in this policy.

## Online safety during virtual sessions

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms, and the background should have no distractions
- A guardian must be present in the same building as the student
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms specified and approved by the Head of Provision to communicate with pupils
- Staff should record the length, time, date, and attendance of any sessions held.

All tutors will be attentive to any signs a child may be at risk and respond in line with the guidelines set out in this policy.

## Children with a Social Worker

At ABLE Education we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. We take these needs into account when making plans to support pupils who have a social worker.

ABLE Education will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. We will keep these services updated on a weekly basis about the child's engagement, attendance and other relevant information.

This includes providing a coordinated offer of early help when additional needs of children are identified. We will contribute to inter-agency plans to provide additional support to children subject to child protection plans and are assessed as being in need under section 17 of the Children Act 1989<sup>25</sup>.

The Designated Safeguarding Lead will attend all child protection meetings (or submit a report in line with local LSP arrangements, where attendance is not possible).

## Early Help

### Early Help, Single Assessment (formally known as the Common Assessment Framework, CAF)

An Early Help Single Assessment coordinated by a Lead Professional enables the professionals working closely with children and young people to ensure that they and their families get the help they need.

An Early Help Single Assessment will identify the needs of the child or young person and their family and the best services to meet their needs. The Lead Professional will organise a Family Support Meeting with the parent(s), young people and relevant services to coordinate a Family Support Plan.

Effective Early Help relies upon local agencies working together to use the Early Help Single Assessment to:

- Identify children and young people and their families who would benefit from Early Help
- Undertake a Single Assessment of the need for Early Help; and
- Provide additional, targeted, or enhanced early help services to address the assessed needs of a child and their family, which focus on activity to significantly improve the outcomes for the child

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<sup>25</sup> [Children Act 1989, Section 17](#)

Before determining what services are to be provided for a particular child or young person, so far as is reasonably practicable and consistent with the child's welfare, professionals will consider the child or young person's perception of their circumstances and what they want to change and any ideas they have about what will help.

Where parents or a young person do not consent to Early Help or do not use the services offered, the Lead Professional should make a judgement as to whether the needs of the child will escalate without significant help. If so, a referral to Social Care may be necessary.

Where a child or young person or their family has very complex needs or the Early Help Family Support Plan has not resulted in the desired improvement outcomes for the child or young person, an assessment by Social Care may be appropriate and can be referred under the "step-up procedures".

A new Early Help Assessment is not required if there is a recent assessment completed by Children's Social Care or a current multi-agency plan which can then be used to "step-down services" to be delivered by Early Help.

## Taking Action

Key points staff should remember when taking action are:

- in an emergency, there must be no hesitation in taking the action required to keep a child safe. If necessary, a 999 call should be made.
- concerns should be reported as soon as possible to the ABLE Education Designated Safeguarding Lead, Johanna Imade at [safeguarding@able-education.co.uk](mailto:safeguarding@able-education.co.uk) by the end of the day. This will be recorded on our safeguarding forms and kept on file
- do not investigate
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, family or anyone else other than the relevant authority's assigned point of contact
- any conversations around safeguarding should be recorded and shared with the DSL. If the DSL is not available, staff should take advice from local children's social care.
- The provision's DSL will share relevant information with the home school's DSL. Their contact details will be kept within the student's file.

Staff should be familiar with "What to do if you're worried a child is being abused"<sup>26</sup>, which contains relevant examples of different types of safeguarding issues.

Appendix 2 features a full flowchart for responding to concerns, disclosures or incidents. This step-by-step process should be used as a quick reference guide.

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<sup>26</sup> [to do if you're worried a child is being abused - GOV.UK](#)

## If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil is at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or display physical signs of harm. In these circumstances, staff will create openings where the pupil has the opportunity to talk about anything that may be on their minds and see if anything can be done to assist them.

Staff should use the ABLE Education safeguarding email address to record these early concerns. If the pupil makes a disclosure, staff should follow the advice below. Following an initial conversation with the pupil, any concerns should be raised with the DSL, Johanna Imade at [safeguarding@able-education.co.uk](mailto:safeguarding@able-education.co.uk).

## If a pupil makes a disclosure

It takes a lot of courage for a child to disclose that they have been/are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have issued threats of what will happen if they spoke out; they may have lost trust in adults; or they may believe, or have been told, that the abuse is their fault. Sometimes they may not even be aware that what is happening is unacceptable.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that to help them, they will pass the information on to the DSL. The point at which they tell the pupil this is a matter of professional judgement. During their conversations with the pupils, staff will:

- allow them to speak freely and not be afraid of silences
- remain calm and not overreact
- give reassuring nods or words of comfort e.g. "You are doing the right thing in talking to me", "I want to help"
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother/father think about it
- at an appropriate time, tell the pupil that to help them, the member of staff will pass the information on, explaining to whom and why
- avoid offering any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as "I do wish you had told me about this when it started" may be interpreted by the child to mean that they have done something wrong
- advise the pupil of what will happen next
- report verbally to the DSL even if the child has promised to do so themselves
- email the concern directly to the ABLE Education DSL, Johanna Imade at [safeguarding@able-education.co.uk](mailto:safeguarding@able-education.co.uk) and flag the concern for the attention of the DSL as soon as possible

## Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. The DSL will contact the parent in the event of a concern, suspicion, or disclosure and handle the scenario with sensitivity.

Our focus is the safety and wellbeing of the pupil. Therefore, if notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

### **Referral to children's social care**

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made unless this would increase the risk to the child.

In the above circumstance, contact should be made with the City MASH team on 0115 876 4800 (citymash@nottinghamcity.gov.uk) and/or the police on 101, or in the case of an emergency on 999.

Professionals can consult with a children's social worker in the local authority if they are unsure whether a social work assessment is necessary on 0115 876 4800.

Any member of staff may make a direct referral to children's social care if they believe independent action is necessary to protect a child.

### **Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police, or the NSPCC if:

- the situation is an emergency, and the DSL is unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- they make a judgement that direct referral is in the best interests of the child for any other reason

Staff should familiarise themselves with the Local Arrangements for Safeguarding, Nottingham City Council's Safeguarding Children Partnership's website<sup>27</sup> and its [NCSCP Working Arrangements 2024 - 2025](#)<sup>28</sup> document. For children who reside within Nottingham County Council, the Interagency Safeguarding Children Procedures of the Nottinghamshire Safeguarding Children Partnership (NSCP) website<sup>29</sup> and the Nottinghamshire Safeguarding Children Partnership's Pathway to Provision<sup>30</sup> document should be considered.

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<sup>27</sup> <https://www.nottinghamcity.gov.uk/ncscb>

<sup>28</sup> <https://www.nottinghamcity.gov.uk/media/klln4ovf/ncscp-working-arrangements-2024-2025.pdf>

<sup>29</sup> <https://nottinghamshirescp.trixonline.co.uk/>

<sup>30</sup> <https://www.nottinghamshire.gov.uk/media/129861/pathwaytoprovisionhandbook.pdf>

## Escalating concerns

If a case is not showing adequate signs of progress towards action being taken, concerns will need to be escalated. This could be as a result of:

- difficulty in getting hold of a DSL
- staff not being satisfied with the decision of the DSL
- staff aware that a colleague has not passed on a concern
- external agencies not accepting a referral from the provision when it is appears one is needed
- a lack of feedback leaving staff unaware of the result of their report

Staff should not shut down a concern because they feel "stuck" or "they cannot do anything anymore". If staff become concerned about the progress or action taken in relation to a concern that was reported to the DSL, they should consult the City MASH team directly. If there are concerns about the work of an external agency, the provision will follow the escalation steps outlined in the locally agreed procedures documents.

It is imperative that a concern is not "closed down" without having received the necessary attention, assessment and resolution.

## Whistleblowing

If the options for escalating concerns detailed above have been explored fully and the concern still appears to be inadequately handled, thereby placing the child or young person at risk, the concern should be further escalated in line with the Whistleblowing Policy.

Staff are also reminded that they can make an external whistleblowing report via the NSPCC<sup>31</sup>.

## Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Child protection information will be stored and handled in line with the GDPR and Data Protection Act 2018.

Any information sharing should be:

- necessary and proportionate
- relevant
- adequate
- accurate

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31 [Whistleblowing Advice Line | NSPCC](#)

- timely
- secure

Information sharing decisions will be recorded, whether the decision is made to share or not to share the information.

Child protection information will be stored within ABLE Education's Safeguarding systems, separately from the pupil's file.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information without consent and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them.

The Data Protection Act does not prevent the provision's staff from sharing information with relevant agencies, where that information may help protect a child.

## **COVID-19.**

The COVID-19 pandemic remains a risk to the population of the United Kingdom.

ABLE Education is aware that COVID-19 is accompanied by negative experiences and distressing life events, which can in turn have an impact on the mental health of pupils and their parents. This is highlighted to staff when considering the setting and expectations of pupils' work when they are required to work at home. We will follow the DfE's guidance on providing education remotely.

### **Local and National lockdowns (Including restrictions that impact education settings)**

National restrictions could be reintroduced at any point to support the central government strategy of controlling the virus and preventing it from spreading further.

In such an event, ABLE will be led by government guidance and take advice from Public Health England on the level of risk faced by pupils and staff.

In the event of the reintroduction of national (or local) restrictions that impact our provision, ABLE Education will seek to put measures in place to enable the DSL to carry out their role effectively and continue providing strong safeguarding procedures. This will include developing bespoke documents for COVID-19 safeguarding arrangements and reviewing this safeguarding policy as appropriate.

## Appendix 1: Four categories of abuse

### Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

### Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These expectations may call for interactions that are beyond a child's developmental capability. Contrarily, emotional abuse can take the form of overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of someone else. It could involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

### Sexual abuse

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. The activities may include assault by penetration (for example, rape or oral sex), non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing or non-contact activities.

Non-physical contact activities may involve children looking at sexual images/watching sexual deeds or playing a role in the production of sexual images. They could also involve the encouragement of 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

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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Indicators of abuse

There are physical signs that indicate some types of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs can be a challenge, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they report what has happened. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty.

For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

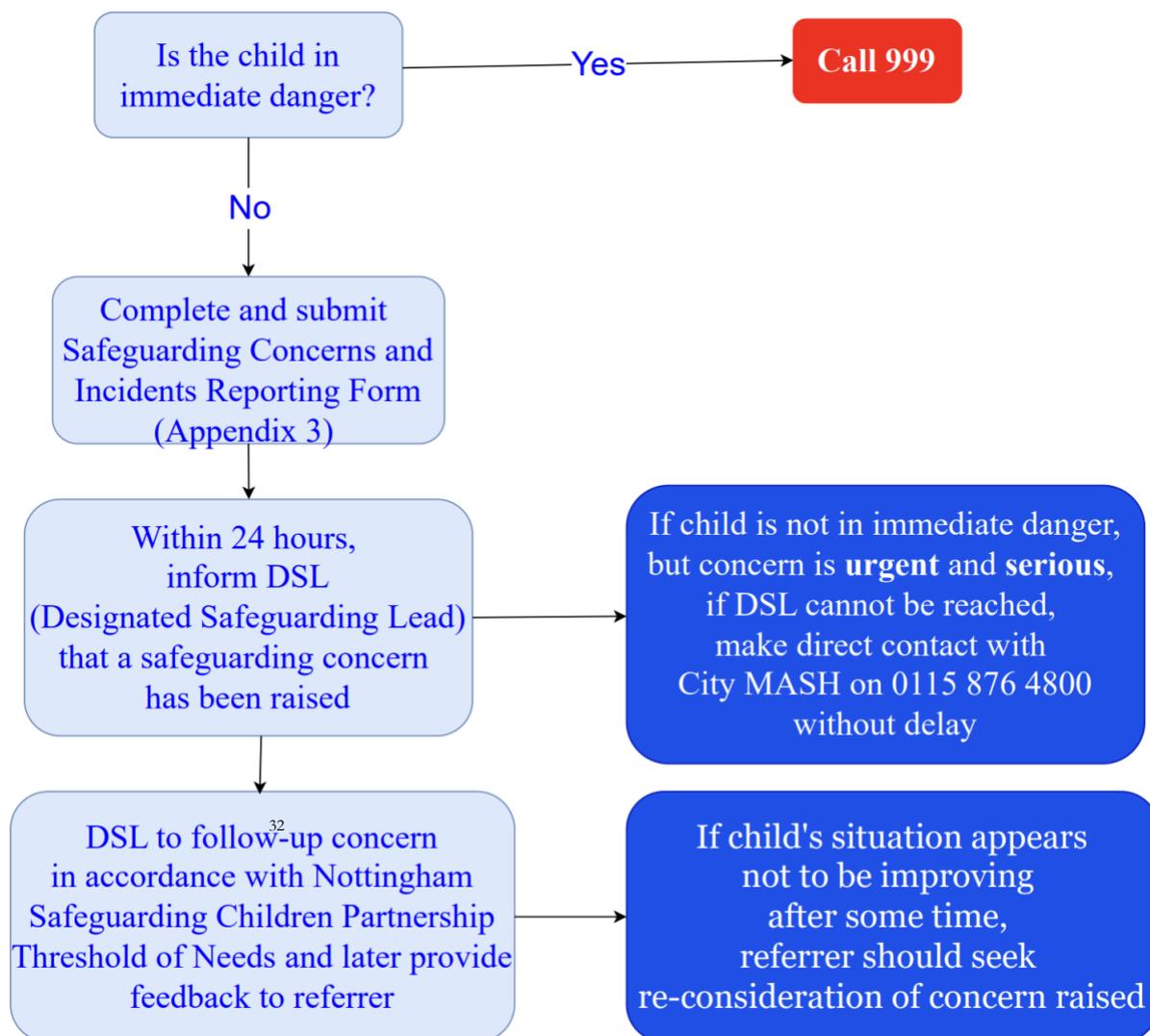
It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected, or exploited may:

- have bruises, bleeding, burns, fractures, or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless regarding their own or other's safety
- self-harm
- frequently miss school, arrive late, or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new "friends"

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

## Appendix 2: Flowchart for reporting a safeguarding concern



<sup>32</sup> <https://www.nottinghamcity.gov.uk/media/nj1a2mhr/2023-nottingham-city-threshold-of-needs.pdf>





## Nottingham City Council's Multi-Agency Child Sexual Exploitation Procedural Flowchart 2016

<p>Identified CSE concerns / young person makes disclosure</p> <p>Immediate risk to self, young person or others</p>	<p><b>This guidance is applicable to all victims of Child Sexual Exploitation (CSE):</b>                  'Child sexual exploitation is a form of child abuse. It occurs where anyone under the age of 18 is persuaded, coerced or forced into sexual activity in exchange for, amongst other things, money, drugs/alcohol, gifts, affection or status. Consent is irrelevant, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and may occur online.'</p>
<p style="text-align: center;">NO <span style="float: right;">YES</span></p> <p>Check your agency records, inform your line manager.</p> <p style="text-align: center;">Complete CSE Profiling Toolkit                  - To include siblings                  - Particular attention to previous sexual abuse</p> <p style="text-align: center;"><b>If medium / high risk factors</b></p> <p style="text-align: center;">Not an open case <span style="float: right;">Open case to Social Care</span></p> <p>Refer to Children &amp; Families Direct (0115 876 4800) <span style="float: right;">Contact allocated social worker. Social worker and line manager to consider CSE Strategy meeting. Children's assessment will be completed/continued</span></p> <p>Send completed CSE Toolkit to;  <input type="checkbox"/> CSE Coordinator  <input type="checkbox"/> Principle Manager of IRO team</p> <p>Discussion regarding the need for Strategy meeting between Social Worker, CSE Coordinator &amp; Principle Manager</p> <p style="text-align: center;">Meeting Needed <span style="float: right;">If meeting not needed</span></p> <p>Arrange via Diary Manager (Attach completed toolkit) <a href="mailto:diary.manager@nottinghamcity.gov.uk">diary.manager@nottinghamcity.gov.uk</a>                  Invite the Sexual Exploitation Investigation Unit and email toolkit to: <a href="mailto:seiu@nottinghamshire.pnn.police.uk">seiu@nottinghamshire.pnn.police.uk</a>                  Invite all other relevant professionals                  Consider inviting young person and carers if appropriate</p> <p>Strategy meeting to decided risk levels: Emerging, Medium or High <span style="float: right;">Recommendations made S47, ICPC, ASHA etc.</span></p> <p style="text-align: center;">If concerns are related to Police intelligence please complete a Concerns Network Information Sharing Form and send to:  <a href="mailto:cnm@nottinghamshire.pnn.police.uk">cnm@nottinghamshire.pnn.police.uk</a></p>	<p><b>Call Emergency Service</b></p> <p><b>If vulnerable or emerging risk indicators, monitor case. Record any changes. Complete toolkit again.</b></p> <p><b>Vulnerability indicators which may increase risk (this is not an exhaustive list)</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Live in a chaotic or dysfunctional family</li> <li><input type="checkbox"/> History of domestic abuse within the family or in own relationship</li> <li><input type="checkbox"/> History of sexual/physical/emotional abuse or neglect</li> <li><input type="checkbox"/> Parents with mental health and/or substance misuse issues</li> <li><input type="checkbox"/> Bereavement or loss</li> <li><input type="checkbox"/> Lack of protective factors within family unit</li> <li><input type="checkbox"/> Social or learning difficulties.</li> <li><input type="checkbox"/> Low self-esteem or confidence</li> <li><input type="checkbox"/> Unsure of their sexual orientation or gender identity</li> <li><input type="checkbox"/> Looked after child</li> <li><input type="checkbox"/> Sexually active</li> <li><input type="checkbox"/> Homeless</li> <li><input type="checkbox"/> Migrant, refugee or asylum seeker</li> <li><input type="checkbox"/> Previous victim of CSE including siblings</li> <li><input type="checkbox"/> Under 13 years of age</li> <li><input type="checkbox"/> Parent/carer has significant physical health issues or learning disabilities</li> <li><input type="checkbox"/> Financially unsupported</li> <li><input type="checkbox"/> Parent/carer involved in sex work</li> <li><input type="checkbox"/> Subject of bullying</li> <li><input type="checkbox"/> Mental health problems</li> </ul> <p><b>Signs and Indicators (this is not an exhaustive list)</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Use of drugs or alcohol</li> <li><input type="checkbox"/> Issues with education/attendance</li> <li><input type="checkbox"/> Frequent poor/aggressive behaviour</li> <li><input type="checkbox"/> Becoming estranged from family</li> <li><input type="checkbox"/> Detached from age related activities</li> <li><input type="checkbox"/> Secretive behaviour/relationships</li> <li><input type="checkbox"/> Change in appearance/ Poor self-image</li> <li><input type="checkbox"/> Secretive about internet use</li> <li><input type="checkbox"/> Association with other victims of CSE</li> <li><input type="checkbox"/> Sexually active under 13 yrs</li> <li><input type="checkbox"/> Pregnancy, miscarriage and/or termination</li> <li><input type="checkbox"/> Multiple or recurring STI's</li> <li><input type="checkbox"/> Returning home late or missing/absent</li> <li><input type="checkbox"/> Unexplained relationships with adults</li> <li><input type="checkbox"/> Receiving calls/texts from unknown persons</li> <li><input type="checkbox"/> Multiple or older boyfriends/girlfriends</li> <li><input type="checkbox"/> Forming relationships via the internet</li> <li><input type="checkbox"/> Entering or leaving unknown vehicles</li> <li><input type="checkbox"/> Self-harming and/or suicide ideation</li> <li><input type="checkbox"/> Over sexualised behaviour/risk taking</li> <li><input type="checkbox"/> Involvement in gangs/crime</li> <li><input type="checkbox"/> Multiple callers to address</li> <li><input type="checkbox"/> Unexplained physical injuries</li> <li><input type="checkbox"/> Involvement in crime</li> <li><input type="checkbox"/> Breakdown of living arrangements</li> <li><input type="checkbox"/> Recruiting others into exploitative situations</li> <li><input type="checkbox"/> Meeting unknown adults/ engaging in sexual activity with adults</li> <li><input type="checkbox"/> History of CSE concerns (including siblings)</li> <li><input type="checkbox"/> Unexplained gifts: clothes, phones, money, jewellery, drugs, cigarettes</li> <li><input type="checkbox"/> Over sexualised appearance</li> <li><input type="checkbox"/> Being groomed to meet adults</li> <li><input type="checkbox"/> Presence in red light areas</li> <li><input type="checkbox"/> Visiting nightclubs/hotels/pubs with adults</li> <li><input type="checkbox"/> Transported from town to town</li> <li><input type="checkbox"/> Associating with known CSE perpetrators</li> <li><input type="checkbox"/> Linked to hotspot CSE areas</li> <li><input type="checkbox"/> Sexual assault disclosure then withdrawal</li> </ul> <p><b>Encouraging people to seek help and support</b></p> <p>There are many reasons why victims will not, or feel they cannot, speak about their experiences or seek help and support so it is important to build trust to enable this to happen.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Always be alert to the possibility that an individual could be experiencing sexual exploitation, regardless of their age or gender, and be prepared to offer support.</li> <li><input type="checkbox"/> When a victim is hard to engage, the person with the best relationship with them should lead discussions.</li> <li><input type="checkbox"/> Ensure professional interpreters are used, never use family members, children or friends where sexual exploitation is known or suspected.</li> <li><input type="checkbox"/> Only ask questions about sexual exploitation when victims are on their own and in a private place.</li> </ul> <p><i>Never assume that someone else will address sexual exploitation issues. You should seek confirmation that other professionals have acted in a way which you would expect. You may be the victim's first and only contact. Remember victims can deny sexual exploitation is happening and minimise the risk of harm. Discuss with your manager, assess the risk level and act accordingly.</i></p>