Children's Sensory Therapy Ltd Safeguarding Policies and Procedures

This policy is a comprehensive guide for safeguarding at Children's Sensory Therapy Ltd (CST)'s Alternative Education Provision (AEP), adopting best practices and aligning with key government guidelines such as **Working Together to Safeguard Children** and **Keeping Children Safe in Education**. The policy is designed to ensure that all individuals involved with the AEP—whether paid staff, volunteers, or third-party workers—understand their responsibilities in safeguarding and child protection. It has been developed in accordance with the Local Authority's model template and complies with current legislation. Please note, that where CST AEP is commissioned by Local Authorities and NHS settings, we adhere to the policies and procedures of those who have commissioned the work.

The introduction provided for CST AEP's safeguarding policy highlights the AEP's commitment to the safety and well-being of its pupils, both within and outside the AEP environment. It emphasises the AEP's dedication to fostering an environment that supports the social, physical, emotional, and moral development of every child, ensuring they feel secure and confident.

Key Points:

1. **Commitment to Safeguarding:** The AEP prioritises the welfare of all pupils and recognises the vital role it plays in safeguarding children and young people.
2. **Caring and Safe Environment:** The AEP aims to create an environment that promotes security, confidence, and independence, enabling pupils to express their concerns openly and be confident they are heard.
3. **Empowerment of Pupils:** CST AEP emphasises the importance of listening to pupils, ensuring they have access to the right support at the right time, and that their voices are valued in the safeguarding process.
4. **Pupil-Friendly Safeguarding Policy:** The AEP has a Pupil Friendly Safeguarding Policy and displays that provide immediate information and support, using accessible signs, symbols, and pictures.
5. **Whole-AEP Preventative Approach:** The AEP adopts a comprehensive approach to managing safeguarding concerns, keeping pupil well-being as the top priority in all actions taken.
6. **Partnership with Community:** CST AEP works closely with parents, carers, the wider AEP community, and local safeguarding partners, and when commissioned by others, follows the safeguarding policies of the individual commissioners e.g. Nottingham City/ Nottinghamshire County Council, to ensure effective safeguarding practices.
7. **Designated Safeguarding Leads (DSLs):** The introduction refers to the DSLs who are responsible for safeguarding at the AEP, with their details available on a specific poster for easy reference.

Part 1 – Policy

1.1. Child Protection Statement

At CST AEP, we are deeply committed to safeguarding children and promoting their welfare. We expect all staff, Senior Leads, volunteers, and visitors to share this commitment by maintaining a vigilant and safe environment. It is the responsibility of everyone in the AEP community to act immediately and report any concerns that might suggest a child is being abused or neglected. This commitment is underpinned by our collective responsibility to work safely and challenge inappropriate behaviours.

We believe in working in partnership with families and other agencies to improve outcomes for children who are vulnerable or in need. Our approach to safeguarding is child-centred, always meaning that our primary consideration is what is in the best interests of the child. This aligns with the guidance from the Department for Education (DfE) in *Keeping Children Safe in Education* (KCSIE) 2023, which states:

"Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child."

1.2. Definitions

Safeguarding - In the context of this policy, "safeguarding and protecting the welfare of children" is defined as:

- Protecting pupils from maltreatment.
- Preventing the impairment of pupils' mental and physical health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to achieve the best possible outcomes.

Child Protection - This is a part of safeguarding and promoting welfare. It refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm. Action should be taken to protect a child if they are suffering or are likely to suffer significant harm.

Staff - This term refers to all individuals working for or on behalf of the AEP, whether full-time or part-time, temporary or permanent, and whether they are in a paid or voluntary capacity.

DSL/DDSL - These abbreviations refer to the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead at the AEP.

Child/children - This term refers to anyone under the age of 18.

Young People - This term refers to adult learners aged 18-19 years old.

Parents - This term encompasses birth parents and other adults who are in a parenting role, such as step-parents, foster carers, adoptive parents, and local authority corporate parents.

Contextual Safeguarding - This concept recognises that incidents and behaviours may be linked to factors outside of the AEP and may occur between children and young people (CYP) outside of the AEP environment. The Designated Safeguarding Lead (or deputy) should take contextual safeguarding into consideration, meaning that assessments should consider whether wider environmental factors present in a child's life pose a threat to their safety and/or welfare.

1.3. Aims

Overall Aim

The overall aim at CST AEP is to ensure that children and young people (CYP) are effectively safeguarded from any potential risk of harm and that their safety and well-being remain the highest priority in all aspects of the AEP's work. We are committed to ensuring that all members of the AEP community are aware of their responsibilities in relation to safeguarding and child protection and that they fully support the AEP's commitment in these areas.

At CST AEP:

- **Safeguarding and promoting the welfare of CYP is everyone's responsibility.**
  Every member of the AEP community has a role to play in safeguarding, ensuring that the well-being of CYP is the focal point of our actions.
- **A child-centred approach is paramount.**
  All professionals must always consider what is in the best interests of the pupil. This is best achieved by each individual and agency working together to meet the needs of our most vulnerable children.
- **We adopt an 'it can happen here' approach to safeguarding.**
  This ensures that we are always vigilant and proactive in safeguarding matters.
- **Everyone who comes into contact with CYP has a role to play.**
  This includes identifying concerns, sharing information, and taking prompt action to protect CYP.
- **Victims of harm are supported without judgment.**
  Victims should never feel that they are creating a problem by reporting abuse, sexual violence, or sexual harassment, nor should they feel ashamed for coming forward.

This policy establishes a clear and consistent framework for delivering on this commitment, aligned with the latest safeguarding legislation and statutory guidance, including Section 175/157 of the Education Act 2002, *Keeping Children Safe in Education* (KCSIE), *Working Together to Safeguard Children*, and, where appropriate, under the Children Act 1989. We aim to achieve this by:

- **Ensuring awareness and responsibility:**
  Members of Senior Leadership team, teachers, non-teaching staff, and volunteers understand their responsibilities under safeguarding legislation and statutory guidance. They are trained to be alert to signs of child abuse and know how to report and refer concerns to the DSL.
- **Building a strong safeguarding culture:**
  Contributing to a safe, resilient, and robust safeguarding culture within the AEP, where learners are treated with respect and dignity, are taught to treat others with respect, feel safe, have a voice, and are listened to.
- **Implementing structured procedures:**
  Establishing and adhering to clear procedures for all members of the AEP community to follow in cases of suspected harm or abuse.

- **Identifying and supporting vulnerable pupils:**
  Making provisions for any pupil who has been subject to, or is at risk of, abuse, neglect, or exploitation.
- **Promoting safer recruitment practices:**
  Creating a culture of safer recruitment by adopting procedures that deter, reject, or identify people who might pose a risk to children. Employed staff, subcontracted staff, support staff and volunteers, are appointed only after all appropriate checks have been satisfactorily completed.
- **Teaching safety and prevention:**
  CST AEP is an English tutoring service and as such RSE is covered by the on-roll AEP.
- **Linking policies:**
  Highlighting the connection between the Safeguarding Policy and the AEP's policy for safer recruitment of staff and volunteers, and for managing allegations.
- **Emphasising communication:**
  Stressing the importance of good communication between all staff members and those with designated safeguarding responsibilities, including those responsible for mental health, attendance, health and safety, and other related areas.
- **Maintaining external relationships:**
  Ensuring appropriate safeguarding policies, procedures, and arrangements for service providers who use the AEP's premises for extended AEPs or provide any before and after AEP activities.
- **Working in partnership:**
  Collaborating with Multi-Agency Safeguarding Hub (MASH), Safeguarding Partners, and other relevant agencies, including similar services in neighbouring authorities where applicable.

1.4. The Legal Framework/Statutory Duties that Apply to AEPs

This policy has due regard to all relevant legislation and statutory guidance, including, but not limited to:

Legislation

- **Children Act 1989**
- **Sexual Offences Act 2003**
- **Female Genital Mutilation Act 2003** (as inserted by the Serious Crime Act 2015)
- **Children Act 2004**
- **Safeguarding Vulnerable Groups Act 2006**
- **Apprenticeships, Children, and Learning Act 2009**
- **Equality Act 2010**
- **The Education (AEP Teachers' Appraisal) (England) Regulations 2012** (as amended)
- **Anti-social Behaviour, Crime and Policing Act 2014**
- **Counter-terrorism and Security Act 2015**
- **The UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018**
- **Voyeurism (Offences) Act 2019**
- **Domestic Abuse Act 2021**
- **Marriage and Civil Partnership (Minimum Age) Act 2022**

Statutory Guidance

- **Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales' 'The Prevent duty'**
- **DfE (2023) 'Working Together to Safeguard Children'**
- **DfE (2018) 'Disqualification under the Childcare Act 2006'**
- **DfE (2023) 'Keeping children safe in education 2023'**
- **HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'**
- **HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'**
- **Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'**

Non-Statutory Guidance

- **DfE (2015) 'What to do if you're worried a child is being abused'**
- **DfE (2017) 'Child sexual exploitation'**
- **DfE (2018) 'Information sharing'**
- **DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'**
- **DfE (2021) 'Teachers' Standards'**
- **[Updated] DfE (2023) 'Recruit teachers from overseas'**
- **DfE (2022) 'Working together to improve AEP attendance'**
- **DfE (2023) 'Meeting digital and technology standards in AEPs and colleges'**
- **Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'**

Working Together to Safeguard Children & Keeping Children Safe in Education

CST AEP is committed to safeguarding and promoting the welfare of children, ensuring compliance with statutory requirements as outlined in the **Working Together to Safeguard Children** and **Keeping Children Safe in Education** guidance. The AEP will establish and maintain safeguarding practices that reflect the importance of safeguarding children, including:

- **Inter-agency Working**: Ensuring the AEP actively contributes to inter-agency working, following the statutory guidance in *Working Together to Safeguard Children*. This includes offering coordinated early help when additional needs of children are identified and participating in inter-agency plans for children subject to child protection plans.
- **Accountability**: Establishing a clear line of accountability for the commissioning and provision of services aimed at safeguarding and promoting the welfare of children.
- **Leadership**: Assigning a senior staff member to take leadership responsibility for the AEP's safeguarding arrangements.
- **Listening to Children**: Fostering a culture where children's voices are heard, their wishes and feelings are taken into account, and systems are in place for them to express their views and provide feedback.
- **Responding to Allegations**: Implementing procedures to respond robustly to allegations, including those involving children harming other children (such as sexual violence and harassment) and allegations against staff and volunteers.
- **Information Sharing**: Establishing clear processes for sharing information with other professionals and the local safeguarding partners.

- **Designated Safeguarding Lead (DSL)**: Ensuring that a designated professional lead for safeguarding is in place. This individual supports other staff in recognising the needs of children, including responding to potential abuse or neglect. The DSL should be part of the AEP's senior leadership team and have clearly defined roles in their job description. They should be provided with sufficient time, resources, supervision, and support to effectively carry out their child welfare and safeguarding duties.
- **Safer Recruitment Practices**: Adopting safer recruitment practices for individuals permitted to work regularly with children, in line with *Keeping Children Safe in Education* guidelines. This includes obtaining relevant Disclosure and Barring Service (DBS) checks and conducting online checks for shortlisted candidates.
- **Single Central Record (SCR)**: Maintaining a single central record of DBS checks and safeguarding training, which must cover:
    - All staff (including supply staff) working in the AEP.
    - Individuals in regular contact with children in the AEP, including volunteers.
- **Suitability of Staff**: Ensuring that all staff employed in early or later years childcare have undergone the appropriate checks and are suitable to work in these settings.
- **Training**: Providing mandatory safeguarding training for all staff at the point of induction, which includes familiarisation with safeguarding responsibilities, procedures for reporting concerns, and managing disclosures. There is an ongoing program of refresher training and updates for staff/volunteers on key safeguarding issues at least annually.
- **Safeguarding Policies**: Ensuring the AEP has effective child safeguarding policies in place, alongside a behaviour policy, a response protocol for children who go missing from education, a staff behaviour policy (code of conduct), and a whistleblowing policy. These policies are provided to all staff, including temporary staff and volunteers, via the staff handbook at induction.
- **Review and Improvement**: Facilitating regular reviews of safeguarding practices among all professionals to ensure continuous improvement.
- **Record-Keeping**: Ensuring the designated lead for safeguarding maintains comprehensive records, which should inform reviews of the support provided to children and the level of concern for their welfare.
- **Compliance with Local Safeguarding Procedures**: Ensuring full compliance with the requirements of the Local Safeguarding Children Partnership (LSCP), including engagement in the Serious Case Review process.

Safeguarding Allegations Process

When a safeguarding allegation is made, the AEP will adhere to the following procedures:

1. **Following the Safeguarding Policy**: The AEP will immediately follow its safeguarding policy and procedures to ensure the safety and welfare of the child involved.
2. **Informing the Local Authority Designated Officer (LADO)**: Any allegation of this nature will be reported to the Local Authority Designated Officer (LADO) without delay. The LADO will provide guidance and oversight in managing the case.
3. **Circumstances for Reporting**: An allegation may involve a person who works with children and 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 they may pose a risk of harm to children.
    - Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

4. **Scope of the Policy**: These procedures apply to all individuals working within the AEP, as well as external organisations and individuals using the AEP premises to run activities for children.

By implementing these policies and procedures, CST AEP ensures that all safeguarding allegations are handled appropriately, safeguarding the welfare of children and maintaining a safe environment for all.

Local Guidance from the Local Safeguarding Partnership

At CST AEP, our local authority is Nottingham City and Nottinghamshire County. We will work closely with the Nottingham City and/or County Safeguarding Children Partnership (NCSCP) depending on the commissioning body/ location of the CYP, to ensure the safety and well-being of all our pupils. The NCSCP provides critical support, resources, and guidance on safeguarding issues, helping us address specific topics relevant to our AEP community. Detailed information on various safeguarding topics can be found on the Nottingham City/ County Safeguarding Children Partnership websites.

Role of the Local Authority Designated Officer (LADO)

The Local Authority Designated Officer (LADO) plays a crucial role in managing and overseeing cases where allegations are made against individuals working with children. The LADO's responsibilities include:

- **Providing Advice and Guidance**: The LADO offers expert advice and guidance to AEPs, ensuring that any allegations are handled appropriately, in collaboration with the police and other relevant agencies.
- **Monitoring Progress**: The LADO monitors the progress of individual cases to ensure they are dealt with efficiently, thoroughly, and fairly, adhering to established processes.

Reporting Allegations

- **Immediate Reporting**: Any safeguarding allegation should be reported immediately to the Manager of CST. If the allegation concerns the Manager of CST, it should be reported to the Lead teacher or their equivalent.
- **Involvement of LADO**: The LADO must be informed within one working day of all allegations that come to the employer's attention or are made directly to the police.
- **Referral to Disclosure and Barring Service (DBS)**: If an organisation removes an individual from regulated activity due to a safeguarding concern, or would have done so had the person not left, a referral must be made to the DBS. Failure to make a referral without good reason is an offense.

Record Keeping and Early Intervention

Paragraph 423 of *Keeping Children Safe in Education* emphasises the importance of thorough record-keeping for concerns or allegations that do not meet the harm threshold. AEPs are expected to focus closely on early intervention, ensuring that such concerns are addressed proactively. This expectation is reinforced through regular safeguarding training for all staff.

AEP Policies

In addition to the statutory safeguarding duties, CST AEP adheres to a comprehensive set of policies designed to protect and support our pupils. These include:

- Anti-Bullying Policy
- Drugs Education Policy
- Code of Conduct Policy
- Equality Information & Objectives Policy
- Positive Behaviour Support & Physical Intervention Policy
- Pupil Attendance Policy
- Child Missing from Education Policy
- Health and Safety Policy
- Managing Medical Needs & Medicines Policy
- Educational Off-Site Visits Policy
- Children in Care/Previous Children in Care Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Management of Allegations Policy
- GDPR Data Protection Policy
- Visitor Policy
- Photography Policy
- Staff/Pupil I Devices Policy
- Information Filtering and Monitoring Policy

These policies ensure that all staff, pupils, and volunteers understand and follow the appropriate procedures to maintain a safe environment at CST AEP. Pupils are also educated about safeguarding, including online safety, through a variety of teaching and learning opportunities, as part of a broad and balanced curriculum. This is detailed in our safeguarding curriculum map.

The CST manager and Senior Leadership Team are responsible for ensuring that all adopted policies and procedures are accessible, understood, and followed by all staff.

For more accessible information, please refer to our 'Pupil Friendly' safeguarding information and policies.

By adhering to these principles and practices, CST AEP demonstrates its commitment to the highest standards of safeguarding, ensuring the safety and well-being of all children in its care.

1.5. Equalities Statement

At CST AEP, we are committed to upholding the principles of equality and ensuring that our safeguarding practices are inclusive and fair. In line with our responsibilities under the Equality Act 2010, we consider both our general and specific duties under the Public Sector Equality Duty in all aspects of safeguarding.

General Duties

Our general duties include:

- **Eliminating Discrimination**: We are committed to eliminating discrimination, harassment, victimisation, and any other conduct prohibited by the Equality Act 2010.
- **Advancing Equality of Opportunity**: We work to advance equality of opportunity between people who share a protected characteristic (such as age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity) and those who do not share it.
- **Fostering Good Relations**: We strive to foster good relations across all protected characteristics, ensuring that individuals who share a protected characteristic and those who do not are treated with equal respect and consideration.

Specific Duties

Details of our specific duties are outlined in CST AEP's equality statement and measurable objectives. These objectives guide our ongoing efforts to promote equality, diversity, and inclusion within our AEP community.

Alignment with Local and National Policies

CST AEP adheres to the Nottingham City and County Equality and Diversity Policy, contributing to the wider Equality, Diversity & Inclusion (EDI) Strategy in our community. Our commitment extends beyond compliance; we actively promote anti-oppressive practices, ensuring that every member of our AEP community feels valued and respected.

Rights Respecting AEP

CST AEP is also guided by the principles of the United Nations Convention on the Rights of the Child and the Human Rights Act 1998. As a Rights Respecting AEP, we embed these principles into our daily practices, ensuring that all students are aware of their rights and the importance of respecting the rights of others. For more information on our work as a Rights Respecting AEP, please visit our website.

Through these commitments, we ensure that our safeguarding practices are not only legally compliant but also grounded in a strong ethos of equality, respect, and inclusion.

1.6. Professional Expectations, Roles, and Responsibilities

Role of the Senior Leadership Team

The named Senior Lead (identified on safeguarding posters around the building) is the designated member of the Senior Leads responsible for overseeing safeguarding responsibilities at CST AEP. The role ensures that safeguarding and child protection practices, processes, and policies—including online safety, filtering, and monitoring standards—are effective and compliant with current legislation, statutory guidance, and Local Safeguarding Partnership arrangements. The lead will attend training or updates at least every three years and will receive regular safeguarding updates from the Nottingham City and County Safeguarding Children Partnership (NCSCP).

The Senior Leads has several critical duties related to safeguarding, which include:

- **Strategic Leadership**: Taking strategic leadership responsibility for the AEP's safeguarding arrangements.
- **Liaison**: Ensuring a member of the Senior Leads is nominated to liaise with the local authority and/or partner agencies on issues of child protection, particularly in cases

involving allegations of abuse made against the Managing Director or other senior members of staff.

- **Policy and Procedure**: Ensuring that the AEP has an up-to-date child safeguarding policy, single central record, staff conduct policy, and procedures that comply with Nottingham City/ County Safeguarding Partners. This includes safe recruitment procedures, appropriate checks on staff and volunteers, and handling allegations against staff or volunteers.
- **Safe Recruitment**: Creating a culture of safe recruitment within the AEP. This includes adopting recruitment procedures that deter, reject, or identify people who might pose a risk to children, in line with Part Three: Safer Recruitment, from *Keeping Children Safe in Education 2023*.
- **Designated Safeguarding Lead**: Appointing a member of the AEP's leadership team to the role of Designated Safeguarding Lead (DSL).
- **Single Central Record**: Ensuring that the AEP maintains an up-to-date single central record of pre-employment checks, specifying when each check was made and when it will be renewed.
- **Resource Monitoring**: Monitoring the adequacy of resources committed to child safeguarding and the training profile of staff and Senior Leads.
- **Case Management**: Recognising that neither the Senior Leads nor individual Senior Leads have a role in managing individual cases or a right to know details of specific cases, except when exercising disciplinary functions concerning allegations against staff.
- **Policy Availability**: Ensuring that the child safeguarding policy is available to parents and children upon request.
- **Policy Integration**: Ensuring that the safeguarding policy complements other AEP policies, such as the anti-bullying policy (including cyberbullying) and health and safety policies, to create an integrated model of safeguarding across the AEP.
- **Safeguarding Culture**: Developing a safeguarding culture and facilitating a whole-AEP approach to safeguarding, ensuring that all processes and policies operate in the best interests of the child.
- **Child-Centred Approach**: Ensuring that the child's wishes and feelings are considered when determining actions by AEP leaders.

Role of the Lead Teacher

The named Senior Lead (identified on safeguarding posters around the building) has several critical responsibilities to ensure the safety and welfare of all pupils. These duties include:

- **Policy Implementation**: Ensuring that the policies and procedures are effectively implemented and followed by all staff.
- **Policy Review and Accessibility**: Updating the Child Protection and Safeguarding Policy annually and ensuring it is available to the public via the AEP website. Designated staff should review the policy when Nottingham City/ County Safeguarding Partners update their policies and procedures.
- **Resource Allocation**: Allocating sufficient resources and time to enable designated persons and other staff to fulfil their safeguarding responsibilities. This includes participating in strategy discussions, multi-agency meetings, and contributing to the assessment and support of children and young people. The lead teacher also ensures that staff are appropriately trained.
- **Centralised Database**: Maintaining a single central database of all staff and volunteers, which includes their safeguarding training dates. This database must confirm that all staff and volunteers who meet the specified criteria have undergone a DBS check, noting when the check was made and when it will be renewed.

- **Addressing Concerns**: Ensuring that all staff and volunteers feel empowered to raise concerns about poor and unsafe practices concerning pupils. Such concerns should be addressed promptly and in accordance with agreed policies.
- **LADO Involvement**: Contacting the Local Authority Designated Officer (LADO) when there are concerns about a member of staff's suitability to work with children.
- **Allegations Against Non-Employees**: In cases where an allegation is made against a staff member who is not employed by the AEP, such as a supply teacher, the Headteacher must immediately contact both the concerned agency and the LADO. The AEP will continue to support any investigation required, as outlined in *Keeping Children Safe in Education* (Pages 90, Paragraphs 373-374).
- **Awareness of Safeguarding Signs**: Ensuring that AEP staff are sensitive to signs that may indicate possible safeguarding concerns, such as poor or irregular attendance, persistent lateness, and children missing from education. This is particularly crucial when there are concerns regarding potential forced marriage or female genital mutilation. As of February 2023, it is a crime to conduct any act intended to cause a child to marry before their 18th birthday, even if violence, threats, or coercion are not used. This applies to both non-binding, unofficial marriages as well as legal ones, as detailed in *Keeping Children Safe in Education* (Pages 155-156).
- **Ongoing Training**: Regularly updating child safeguarding training in line with advice from the Nottingham City/ County Safeguarding Partners, ensuring that knowledge and practices remain current and effective.

The lead teacher plays a pivotal role in maintaining and promoting a safe environment for all pupils at CST AEP, ensuring that all safeguarding policies and practices are robust, up-to-date, and effectively implemented.

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) play a critical role in ensuring the safety and well-being of children within an AEP environment. Their responsibilities are extensive and cover a wide range of safeguarding activities, as outlined in national guidance such as "Keeping Children Safe in Education." Here's a breakdown of their main duties and responsibilities:

Core Responsibilities:

- **Lead Responsibility for Safeguarding**: The DSL/DDSL take the lead in child protection matters, including online safety, and ensure staff are aware of the filtering and monitoring systems in place.
- **Agency Liaison**: They collaborate with external agencies such as social services or the Local Authority Designated Officer (LADO) if there are concerns about possible abuse, harm, or the suitability of staff members to work with children.
- **Record Keeping and Data Security**: DSL/DDSL ensure that written records of concerns are kept securely and that these records are distinctly separated from other student files. If stored electronically, additional password protections are implemented.

- **Child Protection Plans**: They ensure the AEP adheres to child protection procedures, particularly when a student is absent without explanation and is under a child protection plan.
- **Supporting Staff**: DSL/DDSL provide support to staff and volunteers who may find safeguarding issues stressful, ensuring that they have opportunities to discuss anxieties and receive further support.

Communication and Collaboration:

- **Information Dissemination**: They ensure all staff, volunteers, and visiting professionals are informed of the AEP's safeguarding leads and procedures.
- **Case Management**: DSL/DDSL oversee attendance and child safeguarding records, monitoring for patterns that might indicate a broader concern when isolated incidents seem low-level.
- **Transfer of Safeguarding Records**: When students transfer AEPs, the DSL/DDSL ensure child protection files are transferred securely and confidentially.
- Child Protection records are transferred back to the home school securely when the placement ends by adhering to Nottingham City Council's protocols, which typically include using secure and encrypted methods, obtaining a receipt or confirmation of transfer, ensuring records are complete and up-to-date, and maintaining confidentiality throughout the process.
- **Secure Communication Channels**:
    - Use encrypted email services or secure portals specifically designed for data sharing.
    - Avoid sending sensitive information through unsecured methods (e.g., regular email without encryption).
- **Password Protection**:
    - Protect sensitive documents with passwords and share the password separately through a different communication channel.
- **Data Minimization**:
    - Share only the necessary information to fulfil the purpose, minimizing the risk of over-sharing.
- **Access Controls**:
    - Restrict access to information by ensuring only authorized staff at the home school can view the documents.
- **Document Tracking**:
    - Use systems that provide tracking or read receipts to confirm when and by whom information has been accessed.
- **Encryption**:
    - Encrypt files before sending, especially if using external storage devices like USB drives or email attachments.
- **Confidentiality Agreement**:
    - Ensure both parties have agreed to confidentiality protocols, including proper handling and disposal of sensitive information.
- **Regular Policy Review**:
    - Review and update data sharing policies regularly to align with legal and best practice standards, such as GDPR or other data protection regulations.

Professional Development:

- **Ongoing Training**: DSL/DDSL are required to undergo updated safeguarding training every two years to stay informed about the latest child protection measures and best practices.

Attendance Oversight:

- **Monitoring Absence**: They monitor student attendance, especially for children missing education or with patterns of non-attendance, and liaise with authorities if necessary.

This role is crucial in creating a safe environment for children, managing sensitive information, and ensuring all staff are well-informed about safeguarding responsibilities.

All DSLs and Deputy DSLs need to ensure Multi-Agency working. Further information regarding multi-agency working can be found below in section 2.10.

All staff, whether teaching, non-teaching, volunteers, or others working in the AEP, have a crucial role to play in safeguarding children. Their responsibilities ensure a proactive and vigilant approach to child protection. Below is an outline of the key duties expected of all staff:

Key Responsibilities of All Staff:

1. **Understanding Key Guidance**:
    - Staff are required to read and understand *Part 1* and *Part 5* of the "Keeping Children Safe in Education" (KCSIE) statutory guidance.
    - They must also familiarize themselves with multi-agency working practices to ensure proper collaboration with external agencies when necessary.
2. **Duty to Share Information**:
    - Safeguarding children is a shared responsibility. Staff must promptly share any concerns or information about a child's welfare with the Designated Safeguarding Lead (DSL) or their deputy.
    - In urgent situations, staff have the authority to make a direct referral to Children's Social Care (C/ASC) without needing to go through the DSL.
3. **Awareness of Abuse**:
    - Staff must be alert to the signs and symptoms of harm, abuse, and neglect, including risks related to specific issues such as Female Genital Mutilation (FGM) and Forced Marriage.
    - This information is accessible via the Nottingham City/ County Safeguarding Partners webpage, and staff should know how to act and respond when concerns arise or when a child discloses abuse.
4. **Reporting and Record Keeping**:
    - Staff should know how to properly document concerns and provide any additional relevant information.
    - They are required to report if they suspect unacceptable online content is being accessed by students, or if a student is absent frequently, as this could indicate abuse or neglect.
5. **Ongoing Training**:
    - Child safeguarding training is mandatory for all staff and must be updated regularly. Whole-staff training takes place annually.
6. **Attitude of Vigilance**:

- Staff should always maintain the attitude of "it could happen here" when it comes to potential abuse or neglect, recognising that abuse can occur in any setting.

7. **E-Safety and Online Supervision**:
   - Staff must supervise children appropriately when they are accessing online platforms to ensure that filtering and monitoring systems are effective.
   - When planning lesson content, staff should consider how it may affect the AEP's filtering and monitoring systems. They are responsible for reporting any inappropriate content accessed by students online.
8. **Monitoring Absenteeism**:
   - Repeated absences from AEP can be an indicator of abuse or neglect. Staff should monitor such patterns, and report concerns to the DSL following the AEP's safeguarding and attendance policies.
9. **Adherence to AEP Policies**:
   - All staff are expected to follow the AEP's code of conduct and adhere to relevant AEP policies, including those related to safeguarding and child protection.

By fulfilling these duties, all staff contribute to an AEP environment where the safety and well-being of children are prioritised, and potential issues of harm are addressed promptly and effectively.

When an allegation is made against the lead teacher, the procedure must be handled carefully to ensure proper oversight and transparency. Here's the process and the details regarding professional development and training requirements:

Allegations Against the Lead Teacher:

- **Notification Process**: If an allegation is made against the Headteacher, it is imperative that the **Managing Director of CST** is immediately informed.
- **Local Authority Designated Officer (LADO)**: The allegation must also be reported to the Local Authority Designated Officer (LADO) to ensure external review and investigation. The contact details are:

  Nottingham City

  - **Phone**: 0115 8764762
  - **Email**: LADO@nottinghamcity.gov.uk

  Nottinghamshire County

- **Phone:** 0115 8041272
- **Email**: LADO@nottscc.gov.uk

Professional Development and Training for Staff and Volunteers:

- **Safeguarding and Child Protection Training**:
  - All staff members and volunteers are required to undergo **appropriate safeguarding and child protection training**. This training equips them with the knowledge and skills to recognise and respond to concerns regarding pupil welfare.

- **Induction Training**:
    - Mandatory safeguarding training is provided at **induction** and updated regularly. It includes updates when there is any change in legislation. The topics covered during the induction include:
        - **Child Protection and Safeguarding Policy**: Familiarisation with the policy.
        - **DSL and Deputy DSL Roles**: Information about the roles, identities, and responsibilities of the Designated Safeguarding Lead (DSL) and deputy DSLs.
        - **Staff Code of Conduct** and **Whistleblowing Policy**: Staff must be made aware of expected conduct and procedures for reporting concerns.
        - **KCSIE**: Understanding **Part One** and **Part Five** of the *Keeping Children Safe in Education* guidance.
        - **Behaviour Policy**: Familiarity with the AEP's approach to managing student behaviour.
        - **Children Missing Education Policy**: Knowledge of the policy and the safeguarding response required when children go missing from education.
        - **Online Safety**: Training in safeguarding related to online activities and guidance on escalating concerns.

Ongoing Training:

- **Regular Updates**: Safeguarding and child protection training is updated on a regular basis throughout the year to ensure staff and volunteers remain informed about the latest procedures and legislative changes.
- **Multi-Agency Training**: Staff and Senior Leads are expected to participate in **multi-agency training** to maintain their knowledge and skills. Senior leads over see that all staff have annual mandatory safeguarding training. One member of the senior leadership team reviews the education being offered, (teaching up to standard, students making progress and achievement recorded). The second member of the senior leadership team ensures all policies and procedures are in place up to date and being adhered to and there is paper trail documentation in place for evidence.
- **All staff** receive safeguarding and child protection training as part of their induction. This ensures that AEP leadership is aware of their responsibilities in managing and overseeing safeguarding protocols.

Recency of Training:

- **Annual Training**: Training must be updated at least every three years for all staff and Senior Leads, and records should be kept to ensure everyone is current with their safeguarding responsibilities.

This comprehensive training ensures that staff, volunteers, and Senior Leads are prepared to handle safeguarding concerns effectively, and that allegations against senior staff members, including the Headteacher, are managed transparently and appropriately.

- Introduction to Safeguarding and Child Protection training: Refreshed **annually,** as agreed with Nottingham City/ County Safeguarding Partners
- Whole AEP Refresher Training at least annually
- Safer recruitment training
- Sexual abuse – staff meeting/ Senior Leads meeting
- Domestic Violence – safeguarding INSET
- Honour based violence – Safeguarding INSET

- CSE – safeguarding toolbox talk
- FGM and PREVENT awareness training - Police Workshops/ INSET
- Updated online safety training - safeguarding toolbox talk/ INSET/ Staff meeting
- Ongoing training through staff meetings and briefings i.e., quizzes.

The AEP's approach to safeguarding training ensures that all staff are equipped with the necessary knowledge and skills to effectively protect and support students. Here's an outline of the training framework and specific areas of focus:

Staff Contribution to Safeguarding Arrangements:

- **Engagement in Safeguarding**: Staff members will be given opportunities to contribute to and inform the AEP's safeguarding arrangements, helping to shape policies and procedures.

Designated Safeguarding Lead (DSL) and Deputy DSL Training:

- **Formal Training Requirements**:
  - The Lead DSL and deputy DSLs are required to undergo **formal training** that equips them with the knowledge and skills to effectively carry out their role, including responsibilities related to **online safety**.
  - This training is refreshed every two years as per statutory requirements, with **annual updates** or equivalent training to ensure ongoing proficiency.
  - Deputies are trained to the **same level** as the Lead DSL, ensuring consistent and high-quality safeguarding leadership across the team.
- **Resources and Updates**:
  - DSLs will have access to resources such as **e-bulletins** and relevant **refresher training courses** to stay updated on the latest safeguarding developments.

Key Training Areas for DSLs:

1. **Early Help and Statutory Intervention**:
   - Understanding the **assessment process** for providing early help and statutory interventions, including the **local criteria for action** and referral arrangements.
2. **Child Protection Conferences**:
   - Familiarity with how **local authorities (LAs)** conduct child protection case conferences and child protection review conferences, enabling the DSL to effectively attend and contribute to these when necessary.
3. **Support to NCSCP**:
   - Providing appropriate information and support to the **Nottingham City/ County Safeguarding Children Partnership (NCSCP)**.
4. **Impact of Adversity and Trauma**:
   - Understanding the **long-term effects of adversity and trauma** on children and ensuring support is tailored to mitigate these impacts.
5. **Special Needs and Vulnerable Groups**:
   - Being alert to the specific needs of children in need, including those with **special educational needs (SEND)**, relevant health conditions, and **young carers**.
6. **Information Sharing**:
   - Emphasising the importance of **internal and external information sharing** to safeguard children effectively.

Additional Training Considerations:

- **Safer Recruitment**:
    - Members of the **Senior Leadership Team (SLT)** and Managing **Director** will undergo **safer recruitment training** to ensure that all recruitment practices prioritise child safety.
- **Children in Care**:
    - The **Designated Teacher for Children in Care** will receive appropriate training to promote the **educational achievement** of registered pupils who are in care.
- **Mental Health Lead**:
    - The AEP's **mental health lead** will have access to appropriate training to support the mental health needs of pupils.
- **Autism Awareness Training**:
    - **Autism awareness training** will be incorporated into the AEP's **induction** and ongoing training schedule to ensure staff are equipped to support pupils with autism effectively.

This comprehensive approach ensures that safeguarding, child protection, and student well-being are central to the AEP's ethos, with regular training to keep all staff informed and prepared to address emerging concerns.

To ensure a culture of continuous improvement and compliance with safeguarding responsibilities, the AEP emphasizes the importance of ongoing learning and adherence to updated policies and procedures. Here's how this is integrated into the AEP's safeguarding practices:

Commitment to Ongoing Learning:

- **Openness to New Learning**: All **staff** and the **Senior Leads** are expected to be open to ongoing learning and remain informed about any changes to national and local safeguarding policies, procedures, and guidance, including that provided by **safeguarding partners**.

Training Needs Assessment and Annual Reporting:

- **Annual Training Needs Assessment**:
    - A matrix document detailing the AEP's **training attendance**.
    - This report ensures that the training provided to staff and Senior Leads aligns with the AEP's statutory responsibilities under *Keeping Children Safe in Education* (KCSIE) and reflects the AEP's ability to exercise sound professional judgment in safeguarding matters.
- **Senior Lead Oversight**: Senior leadership have a duty to ensure sufficient resources are available to allow appropriate training to be put in place.

Training Register:

- **Training Register Maintenance**:
    - A **training register** is maintained, tracking when staff and Senior Leads have undergone their safeguarding and child protection training.
    - This register plays a key role in informing the **annual report** presented to the Senior Leads, providing a clear record of who has been trained and when their training needs updating.

This structured approach to training ensures the AEP's safeguarding practices are consistently reviewed and updated, fostering a responsive and informed environment where the well-being of students remains the top priority.

CST AEP places a strong emphasis on **safeguarding education** within the curriculum, ensuring that all students are equipped with the knowledge and skills to stay safe both online and offline. Recognizing the importance of a personalised approach for vulnerable learners, including those with **SEND (Special Educational Needs and Disabilities)** and victims of abuse, the AEP integrates safeguarding education into a wide range of subjects and activities.

Key Elements of the Safeguarding Curriculum:

1. **Preventative Education Approach**:
    - In alignment with *Keeping Children Safe in Education* (KCSIE) guidance, the AEP adopts a **whole-AEP approach** to preventative education, preparing students for life in modern Britain by embedding safeguarding topics into the curriculum.
2. **Personalised Learning for Vulnerable Students**:
    - Acknowledging that a **one-size-fits-all approach** may not be suitable for all students, the curriculum is tailored for more vulnerable learners, such as victims of abuse or those with SEND, providing a **personalised and contextualised** safeguarding education.
3. **Developing Awareness and Safety Skills**:
    - Students are taught to recognise **unacceptable behaviour** and how to keep themselves and others safe. This involves developing their ability to understand risks, resist pressures, and know who to turn to for help and advice, both inside and outside of AEP.
4. **Personal Development**:
    - **Personal Development** focus on key personal development areas like **self-esteem**, **emotional resilience**, **online safety**, and **anti-bullying**.
5. **Curriculum Adaptation Based on Safeguarding Trends**:
    - The curriculum is flexible and will be adapted to respond to emerging safeguarding trends or specific issues identified by the **Designated Safeguarding Lead (DSL)**. For example, if there is an increase in mental health concerns, this will be addressed through targeted curriculum adjustments.
6. **Parental and Student Engagement**:
    - The AEP fosters **parent and carer engagement**, consulting them on key safeguarding-related topics within the curriculum.
    - Students are also given opportunities to contribute to the development of the curriculum through discussions with the **teacher**, ensuring their voices are heard.
7. **Online Safety and Filters**:
    - The AEP ensures that **appropriate filters and monitoring systems** are in place to protect students from accessing harmful content online.

By integrating these elements into its curriculum, CST AEP ensures that students are not only prepared for academic success but also for leading safe, healthy, and responsible lives. Safeguarding education is embedded across the AEP's programs, enabling students to develop the necessary skills to navigate risks and protect themselves and others in various contexts.

To ensure that all students feel safe, supported, and empowered, CST AEP fosters a culture of openness and pastoral care. We take a proactive approach to safeguarding, creating an environment

where students are taught about safety, both online and offline, and are encouraged to voice their concerns. Here's an overview of how CST ensures a **safe environment** for its pupils:

Creating a Safe and Supportive Learning Environment:

1. **Openness and Acceptance**:
    - The AEP promotes an **open and accepting attitude** where pupils, parents, and staff are encouraged to talk about concerns. The AEP is recognised as a **safe place** for students to seek help and express their worries.
2. **Pastoral Care and Listening Systems**:
    - Pupils are assured that their worries and fears will be **taken seriously**, and staff will respond appropriately. The AEP fosters an ethos where students feel **secure**, are encouraged to talk, and know they will be listened to.
3. **Pupil Involvement in Decision-Making**:
    - The AEP involves students in the **decision-making process** when it concerns them, ensuring they feel empowered and heard.
4. **Access to Support**:
    - Students are made aware of **adults** in the AEP they can approach if they have any concerns or difficulties. The AEP has developed well-functioning **listening systems** to ensure students feel supported.
    - **Displays** around the AEP provide information on **Designated Safeguarding Leads (DSLs)** and contact details for external support services, such as **Childline**, making it easier for students to reach out for help.
5. **Safeguarding Education in the Curriculum**:
    - The curriculum is designed to equip students with the **skills needed to stay safe from abuse**. This includes regular teaching on safeguarding topics such as online safety and personal boundaries.
6. **Behavioural Standards and Boundaries**:
    - The AEP maintains a **clear written statement** on the standards of behaviour expected from both staff and pupils. These standards are well understood and endorsed by everyone.
    - Positive and safe behaviour is **encouraged** among students, and staff are trained to be alert to changes in behaviour, which could be an indicator of abuse or neglect.
7. **Relationships with Parents and External Agencies**:
    - The AEP works to establish **effective relationships** with parents and colleagues from partner agencies, ensuring a collaborative approach to safeguarding.
8. **Awareness of Vulnerabilities**:
    - The AEP staff are mindful that certain **personal and family circumstances** or **lifestyles** of some students may increase their risk of neglect or abuse. This awareness helps staff identify students who may be more vulnerable and provide the necessary support.

By implementing these practices, the AEP ensures that its students are educated on safeguarding issues, feel safe and supported, and are empowered to seek help when needed. The AEP maintains a positive and responsive atmosphere, where the well-being of each pupil is a priority.

Working with Parents and Carers

At CST AEP, parents and carers are recognised as essential partners in protecting children from harm. The AEP aims to foster a collaborative relationship with families to ensure the safety and well-being of all pupils.

Key Principles of Working with Parents and Carers:

1. **Role of Parents and Carers**:
    - The AEP acknowledges that **parents and carers** play a crucial role in safeguarding their children and promoting their welfare. By engaging families, the AEP aims to create a supportive environment for students both at AEP and at home.
2. **Open Communication About Concerns**:
    - In most cases, when there are concerns about a pupil, the AEP will discuss these concerns with the **family**. Where appropriate, the AEP will also seek the family's agreement before making a referral to **City/ County MASH** (Multi-Agency Safeguarding Hub).
3. **Considering the Pupil's Views**:
    - The AEP ensures that a pupil's views are taken into account when deciding whether to inform the family about concerns. If a pupil is mature enough to make informed judgments, the AEP will consider their opinion.
    - In some cases, the child may be asked for their **consent** before sharing information with their family.
4. **Helping Parents Understand Safeguarding Duties**:
    - The AEP makes it clear to parents that it has a legal duty to **safeguard and promote the welfare** of all pupils. This includes the possibility of sharing information with and working in partnership with **other agencies** when there are concerns about a pupil's welfare.
    - The AEP emphasises that safeguarding is a collaborative effort and that communication between the AEP, parents, and external agencies is sometimes necessary to ensure the child's safety.

By working closely with parents and carers, the AEP promotes a **shared responsibility** for safeguarding and ensures that both the AEP and families are working together to protect and support pupils.

1.12. Safer Recruitment / Single Central Record (SCR)

Safer Recruitment:

The AEP follows stringent **Safer Recruitment** policies and procedures, as outlined in its **Safer Recruitment Policy**, to ensure that all staff, volunteers, and contractors working with children are suitable for their roles. This is essential to maintain a safe environment for pupils.

- **Enhanced DBS Checks**:
    - An enhanced **Disclosure and Barring Service (DBS)** check, including barred list information, is required for all staff engaged in **regulated activity**. Regulated activity includes those responsible for the care or supervision of children, those working regularly in the AEP while children are on the premises, and those in contact with children under the age of 18 or young adults aged 18-19 in the AEP.
    - The AEP consults the **DfE's DBS Workforce Guides** to determine if a position fits the criteria for the child workforce.
- **Pre-employment Checks**:
    - The **Senior Leads** ensure that pre-employment checks, including DBS and suitability checks, are carried out for all staff, including internal candidates and individuals who have lived or worked outside the UK.

- These checks are also conducted for **Senior Leads**, **volunteers**, and **contractors** to ensure that all individuals involved in the AEP environment are suitable to work with children.

Volunteers:

- All volunteers working with the AEP are **risk-assessed** and undergo appropriate checks based on the nature of their work, contact with children and young people (CYP), and the level of supervision provided.
- **No Unsupervised Volunteers**: Volunteers who have not undergone the necessary checks will **not be left unsupervised** under any circumstances while working with pupils.

Contractors:

- The AEP checks the **identity** of all contractors working on site and requires **DBS with barred list checks** where appropriate, following statutory guidance.
- Contractors without the appropriate checks will not be allowed to work unsupervised while pupils are on-site.

Staff Suitability:

- For any setting that provides care for pupils under the age of eight, the AEP ensures that all staff and volunteers are not disqualified under the **Childcare (Disqualification)** and **Childcare (Early Years)** regulations.
- This ensures that individuals working with younger children meet the necessary standards for providing safe and responsible care.

Through these robust recruitment and vetting processes, CST AEP prioritises the safety and well-being of its students, ensuring that all individuals working within the AEP are qualified and trustworthy.

In addition to the checks required under safer recruitment practices, the AEP must comply with the **Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018**. These regulations outline further disqualification criteria for individuals working with children under the age of eight.

Disqualification Criteria:

A person may be disqualified from working in the AEP environment if they:

- Have certain **orders** or **restrictions** placed upon them.
- Have **committed certain offences** that render them unsuitable to work with children.

Staff Disqualification Declaration:

- **Staff Disqualification Declaration Form**: All staff members are required to sign a declaration confirming that they are not disqualified from working in an AEP setting under these regulations.
- If a staff member is found to be **disqualified**, they will not be allowed to continue working at the AEP.

By adhering to these regulations and implementing robust safeguarding measures, the AEP ensures that all staff are suitable to work in the AEP, particularly with younger children, and that any concerns are addressed promptly.

After appointment, CST AEP ensures that the **ongoing suitability** of staff and volunteers is regularly considered. This process is designed to prevent any opportunity for harm to children and to ensure that no one working at the AEP places children at risk. The AEP's commitment to safeguarding extends beyond initial checks, with regular reviews and vigilance regarding the conduct and suitability of all individuals in contact with pupils.

Referral to the Disclosure and Barring Service (DBS)

The AEP has a legal obligation to refer any staff member or volunteer to the **DBS** if they:

- Have **harmed** a child or pose a **risk of harm** to a child.
- Have **committed an offence** or there is reason to believe that they have done so.
- Have been **removed from working** in regulated activity, or have been **redeployed** to a non-regulated activity, or have been **suspended** due to concerns about their suitability.

This referral duty ensures that individuals who are no longer suitable to work with children are barred from doing so and that their activities are monitored.

Single Central Record (SCR)

The AEP maintains a **Single Central Record (SCR)**, which is a critical document for recording the checks conducted on all staff and certain volunteers. The SCR includes the following:

- **Staff and Volunteers**: All staff, including those employed by agencies, third-party supply staff, and teacher trainees on salaried routes, are recorded on the SCR. Additionally, all members of the **Senior Leads** are listed.

Information Recorded on the SCR:

- **Identity Check**: Verification of the individual's identity.
- **Barred List Check**: Confirmation that the individual is not barred from working with children.
- **Enhanced DBS Check**: Details of the enhanced DBS check, including the date of the check.
- **Prohibition from Teaching Check**: Ensures that no individual barred from teaching is employed in a teaching capacity.
- **Professional Qualifications**: Verification of professional qualifications, where required.
- **Right to Work in the UK**: A check confirming that the individual has the legal right to work in the UK.
- **Additional Overseas Checks**: If the individual has lived or worked outside of the UK, additional suitability checks are conducted to account for this.

Agency and Supply Staff:

- For agency and third-party supply staff, the AEP records whether written confirmation has been received from the **employment business** supplying the member of staff, indicating that all necessary checks have been completed. This written confirmation covers the same

checks that the AEP would conduct for directly employed staff and includes the **date of confirmation** received.

Volunteers:

- If any checks are conducted for volunteers, these are also recorded on the SCR.
- If a **risk assessment** is carried out to determine whether a volunteer requires an enhanced DBS check, the **risk assessment** and its outcome will be noted in the SCR.

Additional Information:

- The AEP may record any other information on the SCR that it deems relevant to safeguarding, beyond the statutory requirements.
- When an individual no longer works at the AEP, their details are removed from the SCR to keep it up to date and accurate.

This comprehensive approach to safer recruitment and maintaining the SCR ensures that all staff, volunteers, and contractors working at CST AEP meet the necessary legal and safeguarding requirements.

Part 2 – Procedures

2.1. Specific Safeguarding Issues

CST AEP is committed to addressing a broad range of safeguarding concerns that can affect children and young people (CYP). The following are key safeguarding issues that the AEP actively monitors:

- **Domestic Abuse**
- **Homelessness**
- **Children Absent from Education**
- **Child Abduction and Community Safety Incidents**
- **Child Criminal Exploitation (CCE)**
- **Cyber-Crime**
- **Child Sexual Exploitation (CSE)**
- **Modern Slavery**
- **Female Genital Mutilation (FGM)**
- **Forced Marriage**
- **Radicalisation**
- **Pupils with Family Members in Prison**
- **Pupils Required to Give Evidence in Court**
- **Mental Health**
- **Serious Violence**
- **Sexual Violence and Sexual Harassment in AEPs**
- **Child on Child Abuse**
- **Neglect**

Additional detailed information about these key safeguarding areas can be found in *Keeping Children Safe in Education (2023, Annex B)*, as well as on the **NSPCC website** under the section on "Types of Abuse." For indicators of abuse and neglect.

Context of Safeguarding Issues:

- Safeguarding incidents often occur **outside the AEP environment** and can be influenced by **external factors**.
- All staff, particularly the **DSL** and **Deputy DSLs**, must always consider the context of these incidents when assessing a child's behaviour or welfare.
- When making referrals to social care, the AEP will provide as much **contextual information** as possible to ensure that external factors affecting the child are fully understood and considered.

2.2. Abuse and Neglect

Staff are expected to take appropriate action when identifying a pupil at potential risk of abuse. If staff members are unsure of the necessary actions to take, they must consult the **DSL** immediately.

- **Definition of Abuse**:
    - Abuse refers to any form of maltreatment that involves **inflicting harm** or failing to act to prevent harm to a child. This can include **ill-treatment** that is not physical, as well as the **impact of witnessing** ill-treatment (e.g., domestic abuse).
    - Abuse may occur in various settings, including family, institutional, or community environments, and can be perpetrated by people known to the child or others, including through the **internet**. Abuse can be fully online or facilitated through online platforms for offline abuse.
    - Children can be abused by one or multiple adults, or by **other children**.

Definitions of Abuse and Neglect

For the purposes of this policy, the following definitions of abuse are provided to help staff understand the various forms of harm children may experience:

***Physical Abuse**:*

- Physical abuse involves acts that cause physical harm to a child, such as **hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating**, or otherwise harming the child.
- Physical abuse also includes cases where a parent or carer **fabricates symptoms** of illness or deliberately **induces illness** in a child.

***Emotional Abuse**:*

- Emotional abuse is the **persistent emotional maltreatment** of a child, causing severe and adverse effects on their emotional development. This can include:
    - Conveying to a child that they are **worthless**, **unloved**, or **inadequate**.
    - Imposing **age- or developmentally inappropriate expectations** that are beyond a child's capability.
    - **Overprotection** that limits a child's ability to explore or engage in normal social interactions.
    - **Bullying**, including cyberbullying, causing a child to frequently feel frightened or in danger.
    - **Exploitation** or **corruption** of a child.
    - Witnessing the **ill-treatment** of others.

- Some level of emotional abuse is involved in **all types of maltreatment**, but it can also occur independently.

***Sexual Abuse**:*

- Sexual abuse involves **forcing or enticing** a child to participate in sexual activities, not necessarily involving violence, and irrespective of whether the child understands what is happening. This includes:
    - **Physical contact**: such as assault by penetration or non-penetrative acts like masturbation, kissing, or touching outside clothing.
    - **Non-contact activities**: such as involving children in **producing or viewing sexual images**, encouraging sexually inappropriate behaviour, or **grooming** a child for future abuse.
- Sexual abuse can be perpetrated by people of any **gender** and **age**.

***Neglect**:*

- Neglect is the **persistent failure** to meet a child's basic physical or psychological needs, resulting in significant harm to their health or development. This includes:
    - Failing to provide adequate **food, clothing, or shelter**.
    - Failing to protect a child from **physical or emotional harm**.
    - Inadequate **supervision**, including the use of inappropriate caregivers.
    - Failing to ensure access to **medical care** or treatment.
    - Being **unresponsive** to a child's basic emotional needs.

Staff Awareness of Indicators of Abuse and Neglect

- All staff are expected to be vigilant and aware of the **indicators of abuse** and **neglect**. Children can be at risk of harm in **various environments**, including at home, AEP, online, and in the community.
- Staff must understand that **abuse, neglect, and other safeguarding issues** rarely exist as standalone events. **Multiple issues often overlap**, making it crucial to stay vigilant and report concerns to the **DSL** without delay.

Awareness of Extra-Familial Harms

- Staff, particularly the Lead DSL and Deputy DSLs, must be aware that safeguarding incidents can be linked to factors **outside the AEP** or may occur between children outside AEP or home environments. This includes awareness of risks associated with **extra-familial harms**, such as exploitation or abuse that occurs in peer groups or in the community.

Role of Technology in Safeguarding Issues

- Technology plays a significant role in many safeguarding concerns, such as **online abuse**, **cyberbullying**, and the sharing of **indecent images**. Staff must remain vigilant about how technology can be misused to harm children and be prepared to intervene when necessary.

For further information on the indicators of abuse and neglect, refer to **Appendix C** of this policy.

2.3. Children in Care (CIC) and Children Previously in Care (CPIC)

Supporting **Children in Care (CIC)** and **Children Previously in Care (CPIC)** is a **key priority** at CST AEP. These children often face additional challenges and require coordinated support from multiple agencies to thrive. The AEP recognises that meeting the needs of this group requires collaboration between education, social services, and other involved agencies.

Key Approach:

- The AEP works closely with external partners to ensure that **CIC** and **CPIC** are provided with the necessary support and interventions to help them succeed.
- All staff are committed to ensuring that the education, welfare, and safeguarding needs of these children are met in a sensitive and coordinated manner.

Designated Lead for Children in Care:

The designated lead for children in care at CST AEP is responsible for overseeing the provision of support for CIC and CPIC and ensuring that the AEP's approach is well-coordinated and effective.

Responsibilities of the Designated Lead:

- **Attending PEP Reviews**: The designated lead will attend **Personal Education Plan (PEP) reviews**, which are designed to track the progress and welfare of children in care, ensuring their educational needs are being met.
- **Provision and Support**: The designated lead ensures that CIC and CPIC receive the appropriate **provision, support, and intervention** based on their individual needs. This support is regularly reviewed to ensure it remains effective and responsive to the child's changing circumstances.

2.4. Private Fostering

Private fostering is an arrangement made privately, without the involvement of a local authority, for the care of a child under the age of 16 (or under 18 if disabled) by someone other than a parent or close relative, for a period of 28 days or more. A **close relative** includes grandparents, brothers, sisters, uncles, aunts, half-siblings, and stepparents but does not include great-aunts or uncles, great-grandparents, or cousins.

Legal Obligations of Parents and Private Foster Carers:

- Both **parents** and **private foster carers** are legally required to notify the **relevant local authority** at least **six weeks before** the private fostering arrangement begins. Failure to do so is considered a **criminal offence**.

Safeguarding Concerns:

- While many privately fostered children are well-supported, they are considered a **potentially vulnerable group**, particularly if they have come from another country. These children may be at greater risk of:
    - **Abuse or neglect**
    - **Trafficking**
    - **Child sexual exploitation** (CSE)

- **Modern slavery**

AEP's Role in Private Fostering:

- **Mandatory Reporting Duty**: AEPs have a statutory obligation to **report to the local authority** if they are aware or suspect that a child is subject to a private fostering arrangement.
- While AEPs are required to inform the local authority, it is not mandatory for private foster carers or social workers to notify the AEP of such arrangements. However, the AEP must be informed of who holds **parental responsibility** for the child.

Actions for AEP Staff:

- **Notify the DSL**: If AEP staff become aware of a private fostering arrangement, they must inform the **Designated Safeguarding Lead (DSL)**.
- **DSL Follow-Up**: The DSL will speak to the child's family to ensure they are aware of their duty to notify the local authority.
- **Verification on Admission**: When a child is admitted to the AEP, steps will be taken to verify the relationship of the adults registering the child to ensure that the AEP understands who has parental responsibility.

2.5. Particularly Vulnerable Groups

CST AEP acknowledges that certain groups of pupils are at a higher risk of abuse and neglect due to specific **vulnerabilities**, both online and offline. The AEP understands that identifying and addressing safeguarding concerns may be more complex for these pupils and that additional barriers may exist in recognising abuse or neglect.

Vulnerable Groups:

Pupils who may face additional safeguarding challenges include:

- **Privately fostered children**
- **Children with disabilities**
- **Children with communication needs**
- **Children engaging in high-risk behaviours**, such as **drug** or **alcohol misuse**.

Role of the Designated Safeguarding Lead (DSL):

- The **DSL** must be aware of the various **guidance and resources** available for safeguarding vulnerable groups, both nationally (Government) and locally (Nottingham City/ County Safeguarding Partners).
- The DSL is responsible for ensuring that any **concerns raised by staff or children** are reported in accordance with national and local safeguarding procedures **without delay**.
- The DSL should also ensure that **staff are vigilant** and able to identify signs of abuse or harm in vulnerable pupils, considering the additional barriers these groups may face in seeking help.

Additional Considerations:

CST AEP recognises that some pupils with **protected characteristics** may require **reasonable adjustments** or **positive action** to address disadvantages that may affect their safety and well-being. This aligns with *Keeping Children Safe in Education* (Page 25, paragraph 89), which highlights the need to take specific steps to protect students who may be disproportionately affected by particular risks.

Managing Safeguarding Concerns for Vulnerable Groups:

Staff at CST AEP must remain alert to the unique risks these vulnerable pupils face and ensure safeguarding practices are adjusted accordingly. For more information on managing safeguarding concerns for specific groups, refer back to section **2.1. Specific Safeguarding Issues**.

Pupils who Need Social Workers

Some pupils may have social workers assigned to them due to **safeguarding or welfare needs**, which can increase their vulnerability to further harm and negatively impact their educational outcomes. CST AEP acknowledges the importance of considering this information when making decisions that affect these pupils.

Role of the Designated Safeguarding Lead (DSL):

- The **DSL** will regularly obtain and utilise information from the **Local Authority (LA)** regarding whether a pupil has a **social worker**.
- This information will be used to guide decisions related to the pupil's **safety, welfare**, and **educational outcomes**, ensuring that actions taken are in the best interest of the pupil.

Impact on Decision-Making:

- **Safeguarding Decisions**: If a pupil has a social worker, this will inform safeguarding decisions, such as how the AEP responds to **unauthorised absences** or other concerns that could put the pupil at risk.
- **Promoting Welfare**: The DSL will also use this information to promote the pupil's overall welfare. This may involve considering additional **pastoral** or **academic support** to help mitigate the disadvantages these pupils may face and to ensure their educational experience is as positive as possible.

Home-Educated Children

Parents have the right to choose **Elective Home Education (EHE)** for their children. However, CST AEP recognises that in some cases, **EHE** may result in children being less visible to the services that are necessary to safeguard and support them.

Informing the Local Authority (LA):

- In accordance with the **Education (Pupil Registration) (England) Regulations 2006**, the AEP is required to notify the **LA** of all deletions from the admissions register when a pupil is taken off roll for elective home education.

Coordinating Meetings with Parents:

- When a parent expresses an intention to remove a pupil from AEP for **EHE**, the AEP will, wherever possible, coordinate a **meeting** with the parent.
- This meeting will be arranged in **collaboration with the LA** and other key professionals to discuss the decision before it is finalised, particularly if the pupil:
    - Has **Special Educational Needs and Disabilities (SEND)**
    - Is **vulnerable** or at **increased risk**

Children in Care (CIC) / Children Previously in Care (CPIC)

Children in care (CIC) and children previously in care (CPIC) often enter the care system due to **abuse and/or neglect**, making them potentially more vulnerable from a safeguarding perspective. **Care leavers**, or CPIC, may continue to experience vulnerability even after leaving the care system.

Responsibilities of the Governing Body:

The **Senior Leads** of CST AEP is committed to ensuring that all staff have the necessary **skills, knowledge, and understanding** to safeguard and support **CIC/CPIC** effectively. This involves:

- Ensuring appropriate staff have access to the relevant information about the **looked after legal status** of the child, including whether the child is looked after under **voluntary arrangements** with parental consent or on an **interim/full care order**.
- Understanding the **contact arrangements** with parents or individuals who hold **parental responsibility**.
- Being aware of the **care arrangements** and the **levels of authority** delegated to the carer by the local authority looking after the pupil.

Role of the Designated Safeguarding Lead (DSL):

The **DSL** is responsible for ensuring that the appropriate staff have access to the necessary details, including:

- Contact information for the **pupil's social worker**.
- For children previously in care (CPIC), the DSL will also have details of the pupil's **personal adviser**.

Safeguarding Procedures:

The AEP follows specific safeguarding procedures for **Looked After Children (LAC)** and **Previously Looked After Children (PLAC)**, as outlined in the AEP's **Children in Care/Previous Children in Care Policy**. This policy provides detailed guidance on supporting the unique needs of these children, addressing both their safety and their educational progress.

LGBTQ+ Pupils

While being **LGBTQ+** is not inherently a risk factor for harm, CST AEP recognises that **LGBTQ+ pupils** may face additional challenges, including being targeted or discriminated against by others. It

is equally important to be aware that pupils who are perceived to be LGBTQ+, regardless of their actual identity, may also experience similar vulnerabilities.

Key Considerations for Staff:

- **Targeting and Vulnerability**: Staff are aware that **LGBTQ+ pupils** can be targeted by others for bullying or harassment. This risk also applies to pupils who are perceived as LGBTQ+ by their peers.
- **Trusted Adults**: The risks to LGBTQ+ pupils can be exacerbated if they do not have a **trusted adult** with whom they feel comfortable sharing their thoughts, feelings, or concerns. Staff should actively work to ensure that all pupils, including those who identify as or are perceived to be LGBTQ+, feel supported.
- **Safe Space**: Staff will make every effort to create a **safe and inclusive environment** where LGBTQ+ pupils can speak openly about their concerns without fear of judgment or discrimination.

Reducing Barriers:

Staff will be vigilant in identifying and addressing the **additional barriers** that LGBTQ+ pupils may face in accessing support and safety, ensuring that these pupils feel **heard**, **understood**, and **protected**.

Pupils Requiring Mental Health Support

CST AEP acknowledges that **mental health problems** in pupils can sometimes indicate that they have experienced, or are at risk of experiencing, **abuse, neglect, or exploitation**. All staff are trained to be alert to the connection between mental health issues and safeguarding concerns.

Key Considerations for Staff:

- **Mental Health as an Indicator**: Staff will be aware that mental health issues such as anxiety, depression, or other emotional difficulties may, in some cases, be signs that a pupil is suffering or has suffered harm.
- **Holistic Approach**: When addressing mental health concerns, staff will also consider the possibility of underlying safeguarding issues and ensure that these are explored and addressed in a timely manner.

Role of the DSL:

- The **Designated Safeguarding Lead (DSL)** will coordinate with relevant staff to ensure that pupils identified as requiring mental health support are also assessed for potential safeguarding risks.

Access to Support:

- Staff will ensure that pupils who need **mental health support** are given access to appropriate **internal and external support services** and that mental health and safeguarding concerns are addressed together, as part of a holistic approach to the pupil's well-being.

Pupils with SEND

When managing safeguarding concerns for pupils with **Special Educational Needs and Disabilities (SEND)**, CST AEP recognises that these pupils may face **additional vulnerabilities**. Staff will take special care to understand and address the unique challenges that pupils with SEND might encounter.

Key Considerations for Staff:

- **Increased Vulnerability**: Pupils with **SEND** can be more susceptible to **abuse and neglect** due to their disabilities. It is important to ensure that these pupils receive proper support, including assistance from the **SENCo** and, when applicable, external agencies through **Education, Health, and Care Plans (EHCP)**.
- **Misinterpretation of Indicators**: Certain indicators of abuse—such as changes in **behaviour, mood, or physical injury**—may sometimes be mistakenly attributed to a pupil's disability without deeper investigation. Staff must avoid assuming that all signs of concern are related solely to the pupil's disability and should always consider the possibility of **abuse or neglect**.
- **Bullying and Disproportionate Impact**: Pupils with SEND can be disproportionately affected by issues like **bullying**, and they may not outwardly display typical signs of distress. Staff should remain vigilant to more subtle signs of harm or abuse in SEND pupils.
- **Communication Barriers**: **Communication difficulties** may prevent pupils with SEND from expressing concerns or reporting abuse. Staff must be mindful of these barriers and work to overcome them using appropriate communication methods and tools.

Reporting and Managing Concerns:

- When reporting concerns or making referrals for **SEND pupils**, staff will consider these unique factors and ensure that any safeguarding concerns are thoroughly investigated.
- The **Designated Safeguarding Lead (DSL)** will work closely with the AEP's **Senior Leadership Team (SLT)** and on-roll school **SENCo**, as well as the pupil's parents or carers, when appropriate, to ensure that the pupil's needs are fully met, and any safeguarding concerns are addressed effectively.

Identifying Safeguarding Issues for CYP on the Autism Spectrum

CST AEP recognises that children and young people (CYP) on the **autism spectrum** may face additional safeguarding challenges due to communication difficulties and differences in understanding social cues and others' motives. The AEP is committed to ensuring that staff are trained to recognise and respond appropriately to any safeguarding concerns for these pupils.

Key Considerations for Staff:

- **Communication Barriers**: Pupils on the autism spectrum may find it challenging to express that they are experiencing abuse, particularly if they have **communication difficulties**. Even pupils with advanced vocabularies may struggle to articulate their experiences of abuse.
    - Staff will utilise a range of **communication strategies** (such as symbols, signing, or visual aids) to support pupils in expressing their concerns.
- **Behavioural Indicators**: It is crucial that staff **do not assume** that certain behaviours, such as **self-harm** or **social withdrawal**, are solely related to a pupil's disability. These behaviours may be signs of abuse or distress and should be **recorded and reported** to a **Designated Safeguarding Lead (DSL)** immediately.

    - Any **subtle changes** in behaviour, even those that may seem minor, could be a pupil's way of communicating that something is wrong or that they are being abused. Staff must remain alert to these changes and investigate further when necessary.
- **Impact of Distress/Anxiety**: Some pupils may experience **physical and/or psychological injury** due to distress, anxiety, or dysregulation. Staff must ensure that appropriate interventions are pursued to support these pupils in managing their emotional responses. Failing to provide adequate support could be considered neglect.
    - The AEP will work collaboratively with **parents/carers** and **other professionals** to implement personalised and meaningful interventions that help pupils manage distress and dysregulation.
- **Inappropriate or Abusive Interventions**: CYP on the autism spectrum may display **challenging behaviours**, which can sometimes make them vulnerable to interventions that are **inappropriate, disproportionate, or even abusive**.
    - Staff will adhere to the AEP's **positive behaviour management policies** at all times, ensuring that interventions are supportive, respectful, and proportionate. The AEP will work closely with **parents/carers** and other agencies to develop and implement appropriate support plans.

Reporting and Responding:

- **Staff Responsibilities**: If staff observe any **indicators of abuse** or have concerns about a child's welfare, they must report these to the **DSL** immediately. Staff must always explore the cause of any concerning behaviour and follow up on **subtle behavioural changes** that may indicate distress or abuse.
- **Collaboration**: The best outcomes are achieved when staff and DSLs **carefully explore all aspects** of a pupil's behaviour, plan appropriate actions, and involve the pupil in the decision-making process. Taking the pupil's **views, wishes, and feedback** into account is crucial in ensuring effective safeguarding interventions.

Identifying and Monitoring the Needs of Our Pupils

The **Designated Safeguarding Leads (DSLs)** at CST AEP are responsible for regularly **reviewing and monitoring** he needs of all pupils, with a particular focus on those who are most vulnerable. This ongoing monitoring is essential to ensure that pupils receive the support they need to thrive academically, emotionally, and socially.

Key Monitoring Areas:

- **Attendance Data**: Monitoring of pupils' attendance records in collaboration with the **Attendance Champion** to identify patterns that may indicate safeguarding concerns.
- **Behaviour Data**: Regular review of behaviour data to ensure early detection of changes in behaviour that may signal distress or safeguarding issues.
- **Attainment Data**: Ongoing assessment of pupils' academic performance to ensure that vulnerable pupils are receiving appropriate support.
- **Safeguarding Records**: For pupils with safeguarding concerns, records will be reviewed to ensure their needs are being addressed appropriately. The are stored within a restricted GDPR compliant folder on 365.

Goals of Monitoring:

- **Early Intervention for Vulnerable Pupils**: For the most vulnerable pupils, **proportionate and early interventions** will be implemented to promote their safety and welfare and prevent harm from escalating.
- **Sharing Information with Relevant Staff**: Information about vulnerable pupils will be **shared with teachers and relevant staff** to ensure that educational outcomes are supported and that the specific needs of each pupil are understood and addressed.
- **Support for Pupils with a Social Worker**: Pupils who currently have, or have had, a **social worker** will have their academic progress and attainment regularly reviewed. **Additional academic support** will be provided to help them overcome any challenges and reach their full potential.
- **Reasonable Adjustments**: The AEP will make **reasonable adjustments** in relation to interventions and support for pupils, particularly in response to their **behavioural** or **sensory needs**. This ensures that the AEP's approaches are inclusive and responsive to individual needs, particularly for pupils with SEND or those who may have experienced trauma.

2.6. Early Help

Early help refers to providing support as soon as a problem emerges, at any stage in a child's life. CST AEP is committed to being proactive in ensuring that every pupil has access to **education**, which is essential for their development and protection from harm. The AEP recognises the importance of its contact with pupils to identify concerns early and intervene as necessary.

Pupils Who May Benefit from Early Help:

CST AEP acknowledges that **any child** may benefit from early help, but staff should be particularly alert to those who:

- Are **disabled**, have certain **health conditions**, or specific **additional needs**.
- Have **SEND**, whether or not they have a statutory **Education, Health, and Care Plan (EHCP)**.
- Are suffering from **mental ill health**.
- Are **young carers**.
- Show signs of being drawn into **anti-social** or **criminal behaviour**, including **gang involvement** or **county lines**.
- Are **frequently missing** from care or home.
- Are at risk of **modern slavery**, **trafficking**, or **sexual** or **criminal exploitation**.
- Are at risk of **radicalisation**.
- **Have family members in custody** or are affected by **parental offending**.
- Are in family circumstances presenting challenges, such as **drug** and **alcohol misuse**, **adult mental health problems**, or **domestic abuse**.
- Are **misusing drugs** or **alcohol**.
- Have returned home from **care**.
- Are at risk of **honour-based abuse (HBA)**, such as **FGM** or **forced marriage**.
- Are **privately fostered**.
- Have experienced multiple **suspensions** or are at risk of permanent exclusion.

Additional Situations for Early Help:

CST AEP will not limit its support to the above categories. The AEP is mindful of a variety of **additional circumstances** where early help may be necessary, including:

- Pupils who are **bereaved**.
- Pupils viewing **problematic or inappropriate online content** or developing **inappropriate online relationships**.
- Pupils who have recently returned to their family from **care**.
- Pupils **missing education**, persistently absent from AEP, or not in receipt of **full-time education**.

Staff Responsibilities:

- **Professional Curiosity**: Staff are encouraged to use their **professional curiosity** and stay alert to all signs of **abuse, neglect, and exploitation**. Any concerns should be raised immediately with the **DSL**.

Role of the Designated Safeguarding Lead (DSL):

- The **DSL** will lead in cases where **early help** is deemed appropriate, coordinating with other agencies and setting up inter-agency assessments when needed.
- **Local early help processes** will be followed, and the DSL will ensure timely intervention by involving appropriate professionals and agencies.

Staff Support in Early Help Assessments:

- **Staff Involvement**: AEP staff may be asked to support or even act as the **lead practitioner** in an early help assessment.
- **Constant Review**: Early help cases will be kept under constant review, and if a pupil's situation does not improve or worsens, the AEP will consider making a referral to **social care** for an assessment of statutory services.

2.7. Reporting Concerns About Pupils to the Designated Safeguarding Leads

All staff at CST AEP have a duty to report any **safeguarding concerns** about pupils to the **Designated Safeguarding Lead (DSL)** or, in their absence, the Deputy DSLs **as soon as possible**.

Immediate Action:

- If at any point there is a risk of **immediate serious harm** to a child, a referral should be made **immediately** to **City/ County MASH** (Multi-Agency Safeguarding Hub) or the **police**.
    - **Anybody** can make such a referral, and staff should not wait for the DSL if urgent action is needed.

Recording:

- All **concerns, decisions, actions,** and **outcomes** must be recorded using the AEP's safeguarding documentation system.

Immediate Response to the Pupil:

CST AEP ensures that pupils have multiple avenues to raise their concerns, including **talking to a teacher or the DSL**. The following guidelines must be adhered to when responding to a pupil disclosure to ensure the child is supported without prejudice to further investigations:

- **Listen Without Shock**: If a pupil shares something shocking, staff should try not to show their reaction. It is essential to remain composed.
- **Observe, Don't Investigate**: If bruises or injuries are visible, it is okay to observe but **never ask the pupil to remove clothing** to examine them.
- **Accept What the Pupil Says**: Take the disclosure seriously, accepting the pupil's words without judgment.
- **Stay Calm and Follow the Pupil's Pace**: Allow the pupil to speak at their own pace without pushing for details. **Do not ask leading questions** such as, "What did they do next?" It is the staff member's role to **listen**, not to investigate.
- **Use Open Questions**: When necessary, use open questions like "Is there anything else you want to tell me?" or "And?" to encourage the pupil to share more without pressure.
- **Avoid Guilt Questions**: Do not ask questions that could burden the pupil with guilt, such as "Why didn't you tell me sooner?"
- **Acknowledge the Difficulty**: Acknowledge how hard it must have been for the pupil to disclose the information.
- **Do Not Criticise the Perpetrator**: Avoid criticising the person the pupil is talking about, as the pupil may still have a relationship with them.
- **Do Not Promise Confidentiality**: Reassure the pupil that they have done the right thing by telling you. Explain that you need to share the information with the **DSL** to help keep them safe. Avoid making promises you cannot keep, like "I'll stay with you the whole time" or "Everything will be all right now."

Staff Awareness:

- Staff should be mindful that some pupils may not feel ready or know how to tell someone they are being abused, exploited, or neglected. Additionally, some pupils may not recognise their experiences as harmful.
- This must not prevent staff from having **professional curiosity**. If there are concerns about a pupil's safety, staff should **always speak to the DSL or deputy DSL**, even if a pupil has not explicitly disclosed abuse.

Recording Information

All safeguarding concerns must be **immediately reported** to a **Designated Safeguarding Lead (DSL)** and logged on, the AEP's safeguarding documentation system. Staff should follow the procedures outlined in the **Flowchart of Procedures for Responding to Safeguarding Concerns** to guide them through the reporting process.

Steps for Recording Information:

1. **Make Brief Notes**:
    - Record notes at the time of the disclosure or immediately afterward.
    - Include the **date, time, place**, and **context** of the disclosure or concern.
    - Ensure that you only document **facts** and not assumptions or interpretations.
    - Include **your name** and **role** in the notes.
    - Upload these notes onto **the AEPs recording documentation**
2. **Recording Observations of Bruising or Injury**:
    - If you observe **bruising** or an **injury**, try to record specific details (e.g., "right arm above elbow").
    - **Do not take photographs** of any injuries.

    - Use the **body map** feature available documentation system to mark the location of injuries or bruises.
3. **Non-Verbal Behaviour and Pupil's Language**:
    - Note any **non-verbal behaviour** displayed by the pupil during the disclosure.
    - Record the **exact words** and language used by the pupil, without translating or reinterpreting them into more formal terms.
4. **Keeping Original Notes**:
    - Keep your **original notes** and pass them on to the DSL. You may be asked to provide further documentation or write a formal **referral**.
5. **Recording Conversations and Communications**:
    - All **verbal conversations**, **body maps**, and any other **communications from pupils** should be promptly recorded and uploaded to **documentation system**.

Supporting Pupils

CST AEP is committed to providing a supportive and nurturing environment for all pupils, particularly those who have experienced abuse, witnessed violence, or are at risk of harm. We understand the significant impact such experiences can have on a child's emotional, mental, and academic well-being, and we are dedicated to providing the right help at the right time.

Key Support Measures for Pupils:

- **Emotional Impact of Abuse**: The staff and Senior Leads recognise that a child or young person (CYP) who has been abused or witnessed violence may struggle to maintain a sense of self-worth. In these circumstances, pupils may feel **helpless**, **humiliated**, or even **self-blame**.
- **Early Help**: As outlined in section **2.6**, we recognise that **any child may benefit from early help**. The AEP is proactive in identifying pupils who may need support early on, ensuring that interventions are implemented before issues escalate.
- **Stability in AEP**: For many pupils who have been abused or are at risk, the AEP may be the only source of **stability** in their lives. CST AEP provides a safe, consistent environment for pupils facing instability or harm at home.
- **Varied Behaviour**: We understand that the behaviour of pupils who have experienced abuse or trauma may vary widely—from **normal** to **aggressive** or **withdrawn**—and we are equipped to respond appropriately to these behavioural changes.
- **Supporting Pupils with SEND**: Pupils with **Special Educational Needs and Disabilities (SEND)** are recognised as being more vulnerable to abuse and neglect. External agencies, such as those involved in an **Education, Health and Care Plan (EHCP)**, should provide ongoing support for these pupils.
- **Mental Health Concerns**: The AEP acknowledges that **mental health problems** can be indicators that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. **Immediate action** should be taken if staff have concerns about a pupil's mental health, in line with safeguarding policy (*Keeping Children Safe in Education 2024*, Paragraphs 43-45). **Advice and guidance** on supporting children's mental health is available through resources such as the **NSPCC** website: www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/depression-anxiety-mental-health

Holistic Support for Pupils:

- The AEP will provide a range of support for all pupils by:
    - Discussing child protection cases with **due regard** for safeguarding the pupil and their family.
    - Supporting individuals who are, or are thought to be, in **need or at risk**, in line with **Nottingham City/ County Safeguarding Partners procedures**.
    - Encouraging **self-esteem** and **self-assertiveness** in all pupils.
    - **Challenging aggression, bullying**, and **discriminatory behaviour** without condoning such actions.
    - Promoting a **caring, safe, and positive environment** that fosters emotional and mental well-being.
- **Provision of Early Help**: The AEP recognises that **timely intervention** is critical in safeguarding responsibilities. **Early Help** will be provided either directly through the AEP or by signposting pupils and families to other local services, in accordance with **Nottingham City/ County's Threshold of Need**. Where Early Help is provided, the AEP will monitor its impact and adjust the support if necessary, including seeking **specialist support** when required.

Confidentiality

CST AEP places a high value on maintaining the **confidentiality** of personal information about pupils and their families. Staff and volunteers are expected to treat this information with care and sensitivity, ensuring it is only shared when necessary for safeguarding purposes.

Key Principles of Confidentiality:

- **Confidential Nature of Personal Information**: All personal information regarding pupils and their families is treated as **confidential**. Staff and volunteers are required to respect this confidentiality in all circumstances.
- **Need-to-Know Basis**:
    - Staff understand that they need to know **only enough** information to act appropriately and sensitively toward a pupil.
    - The **Designated Safeguarding Leads (DSLs)** will share information about a pupil with other staff members **only on a need-to-know basis**. This ensures that detailed information about the pupil, incidents, family background, and actions is not unnecessarily disclosed to staff who do not need it.

Staff Awareness:

- **No Promises of Complete Confidentiality**:
    - Staff must make it clear to pupils that they **cannot promise complete confidentiality** if a pupil discloses information that suggests they or others may be at risk.
    - Pupils should be informed that staff may need to **pass information to other professionals** to ensure their safety or the safety of others.
- **Involving Relevant Agencies**:
    - Where there are **concerns about a pupil's welfare**, staff must ensure that relevant agencies are involved as early as possible.

- **Parental consent** should be sought for involving external agencies, except in cases where seeking consent would **compromise the child's safety** or pose a further risk.
- If a staff member or volunteer has concerns about a pupil's welfare or if a pupil **discloses abuse** or other concerning information, the staff member must speak to their **DSL** with the intention of passing on the information to the appropriate professionals.

2.8. Managing Referrals/Consent

When managing referrals, CST AEP follows guidelines set by the **General Data Protection Regulation (GDPR) 2017**, the **Children Act 1989**, and the **Crime and Disorder Act 1998**. These frameworks ensure that referrals are managed appropriately and in the best interest of the child while respecting data privacy.

Consent for Information Sharing:

- **Informed Consent**: Before making a referral to outside agencies, **explicit and informed consent** must be obtained from parents or carers. This consent allows for **information sharing** to enable holistic support and access to services for the child or young person.
  - Consent should be **recorded** by the referring agency, with clear information provided about **why** and **with whom** the information will be shared.
  - **Referrals without consent** are not typically accepted unless there are overriding **safeguarding concerns**.

Exceptions to Consent Requirement:

There are specific circumstances where a referral can be made without parental or carer consent due to **statutory safeguarding duties**:

- **Immediate Risk of Significant Harm**: If obtaining consent would put the child at risk of harm or cause a delay in intervention.
- **Suspicion of Forced Marriage** or plans to remove a child from the country against their will.
- **Suspicion of Female Genital Mutilation (FGM)**.
- **Disclosure of Sexual or Physical Abuse** that places the child at immediate risk.
- **Suspicion of Fabricated Illness**.

In such cases, information may be shared **without consent** to protect the child.

Working with City/ County MASH:

- **Parental Permission**: Normally, permission to share information with Nottingham **City/ County MASH** (Multi-Agency Safeguarding Hub) should be obtained from an adult with **parental responsibility** before sharing information with **Children's Social Care**.
  - **Exceptions**: If seeking permission would place the child at immediate risk of significant harm or **jeopardise evidence** (e.g., destroying evidence of a crime or influencing a child about a disclosure), information may be shared without permission.

Legal Framework and Information Sharing:

- The **Data Protection Act 2018** and **GDPR** do not prevent sharing information for the purpose of **keeping children safe**.
- **Fears about sharing information** should never impede the need to **safeguard and promote the welfare** of children. The protection of the child takes precedence over data concerns (KCSIE 2024, Page 19, Paragraph 55).

Resources for Further Guidance:

- **Working Together to Safeguard Children 2023**.
- **Data Protection: Toolkit for AEPs**.
- **Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents, and Carers**.

2.9. Confidentiality and Sharing Information

CST AEP acknowledges the importance of **proactive information sharing** between professionals and local agencies to effectively address pupils' needs and identify those who may require early help. The AEP is committed to ensuring that information sharing is handled responsibly and in accordance with safeguarding principles.

Information Sharing in the Context of Safeguarding:

- While the **UK GDPR** and the **Data Protection Act 2018** place a duty on AEPs to process personal information fairly and lawfully, these regulations **do not prevent information from being stored and shared** for **safeguarding purposes**.
    - Data protection laws allow for **information sharing** when **failure to do so** would place a pupil at risk of harm.
- **Staff Awareness**: Staff are made aware that safeguarding partners, such as local authorities, may take **legal action** if specific information is not shared when requested for the purposes of **safeguarding**.
- **No Barriers to Information Sharing**: Staff members must ensure that **fear of sharing information** does not hinder their responsibility to promote the **welfare and safety** of pupils. If a staff member is unsure about sharing information, they should consult the **DSL** or **deputy DSLs** for guidance.

Role of the DSL in Information Sharing:

- The **DSL** will determine who else needs access to specific safeguarding information and will share it on a **need-to-know basis**.
- **Child protection and safeguarding concerns** will be treated with the highest level of **confidentiality**, in line with the AEP's data protection policies.

Principles of Information Sharing:

When making decisions about sharing information, the following principles will guide staff:

- The information must be **necessary and proportionate**.
- It should be **relevant** to the context of safeguarding.
- The information shared must be **adequate** and **accurate**.

- It should be shared in a **timely** manner.
- The information must be kept **secure**.

Recording Information Sharing Decisions:

- All decisions related to **information sharing**, whether or not the decision is made to share the information, will be **recorded**. This ensures transparency and accountability in safeguarding practices.

2.10. Multi-Agency Working

CST AEP recognises the importance of **multi-agency working** as part of its statutory safeguarding duties. The **Senior Leads** and **DSL** are committed to playing a **pivotal role** in collaborating with other professionals and services to ensure the welfare and protection of children, in line with the **Working Together to Safeguard Children 2023** statutory guidance.

Key Responsibilities of the AEP:

- **Contribution to Multi-Agency Working**: The AEP will actively contribute to multi-agency safeguarding arrangements and follow the guidance set out by the **Department for Education (DfE)** in *Working Together to Safeguard Children 2023*. AEPs and colleges have a **statutory duty** to work in coordination with other agencies, including local authorities, health services, and police, to promote the welfare of children.

DfE's Expectations for Strong Multi-Agency Working:

CST AEP will reflect the **DfE's expectations** for multi-agency collaboration by focusing on the following areas:

- **Collaboration and Information Sharing**: The AEP will collaborate with other services to achieve shared goals and ensure that information is **shared effectively** between professionals working with the same child and family. This helps to develop a complete picture of the child's circumstances, placing the **child's voice at the centre** of all decisions, and ensuring the right support is provided.
- **Learning from Evidence**: The AEP will foster an environment where practitioners **learn from evidence** in their individual fields and **share diverse perspectives** through regular reflection on a child's development, experiences, and outcomes.
- **Resource Sharing**: Resources will be **prioritised and shared** based on pupils' needs. Strong relationships will be developed across different agencies to support and protect vulnerable children.
- **Inclusion and Diversity**: The AEP will celebrate inclusivity and challenge any form of discrimination. Practitioners will respond to children facing adversity, including economic and social challenges, family stress, and **parental abuse or neglect**.
- **Mutual Challenge**: Practitioners will engage in respectful and constructive dialogue, **challenging assumptions** when needed to ensure the best outcomes for children.

Safeguarding Partner Arrangements:

The **three safeguarding partners**—the Local Authority, a Clinical Commissioning Group, and the Chief Officer of Police—are responsible for enabling **full engagement** for safeguarding arrangements. CST AEP acknowledges its role as a **relevant agency** and will:

- Engage and participate fully in local safeguarding arrangements, contributing to assessments and plans when required.
- Act in accordance with statutory duties, including those under **sections 17 and 47** of the Children Act, allowing access to **children's social care** for assessments when necessary.

Local Criteria for Action:

- The **Senior Leads and DSLs** understand the local criteria for action and the protocol for assessment and will ensure these are reflected in the AEP's policies and procedures. The AEP is prepared to provide information to the safeguarding partners as requested.

Coordinated Approach:

CST AEP will work closely with **social care**, the **police**, **health services**, and other relevant agencies to promote the welfare of children. This includes:

- Providing **early help** when additional needs are identified.
- Contributing to **inter-agency plans** for children subject to **child protection plans**.

The AEP will also follow **NPCC guidance** on *When to Call the Police* to ensure appropriate referrals are made when necessary. This guidance helps the DSL understand when to contact the police and what to expect during the process. NPCC Guidance: When to Call the Police.

2.11. Identification for Visitors to AEP

CST AEP follows strict procedures for identifying and managing **visitors** to ensure the safety and security of all pupils. This includes guidance for visitors such as **practitioners from other agencies**, private companies, and those involved in extracurricular activities. For more detailed guidance, refer to the AEP's **Visitors Policy**.

Nottingham City/ County AEPs Agreed Visiting Professionals Guidance:

The following procedures are in place:

- **Appointments**: Any professional wishing to work with children or young people (CYP) in the AEP must make a **formal appointment** in advance.
- **Named Professionals**: The named professional who makes the appointment must be the individual conducting the **intervention**.
- **Identification**: Upon arrival, professionals must show their **organisation ID** to verify their identity and their role within the AEP.
- **Acceptance of External Safeguarding Procedures**: Once the organisation ID is shown, the AEP will accept that all **safeguarding procedures** required by the external organisation have been followed, including **DBS clearance**.

Visitor Protocol:

- **Sign-In and Badges**: All visitors are required to **sign in** at the reception and will be issued with a **visitor's badge** to be worn at all times for security purposes.
- **Record Keeping**: AEP staff will maintain accurate records of **contact and discussions** with external services and visitors to ensure full transparency and accountability.

DBS Procedures for Visitors:

- **DBS Certificates**: AEPs will request DBS numbers from visiting professionals.

2.12. Concerns About AEP Safeguarding Practices

If any staff member, volunteer, or visitor has concerns about the **safeguarding practices** at CST AEP, these concerns should be raised with the **Managing Director** or **Lead Designated Safeguarding Lead (DSL)**. The AEP follows a clear process to address such concerns through its **Whistleblowing Policy**.

Whistleblowing Procedures (Refer to Policy for full details):

- **Raising Concerns Internally**: Concerns about the safeguarding practices of the AEP or any adult working on the AEP site (including **volunteers, contractors**, or **external services**) should be immediately reported to the **Headteacher** or **Lead DSL**.
- **Following the Whistleblowing Policy**: The AEP's **Whistleblowing Policy** outlines the procedures for staff to safely and confidentially report concerns regarding the safety and well-being of pupils.
- **External Whistleblowing Channels**:
    - If a staff member feels unable to raise an issue internally, or if they believe their concerns are not being appropriately addressed, they can access **external whistleblowing channels**.
    - The **NSPCC Whistleblowing Helpline** is available for individuals who are concerned about AEP safeguarding practices but do not feel comfortable reporting internally. The helpline can be reached at **0800 028 0285**.

2.13. Responding to Allegations of Abuse Made Against Professionals

At CST AEP, all allegations of abuse made against staff, supply staff, volunteers, and contractors are managed in line with the **Management of Allegations Policy**. This policy ensures that all allegations are handled appropriately, in compliance with statutory guidance, and in coordination with relevant agencies.

Managing Allegations:

The AEP will distinguish between allegations that meet the **harms threshold** and those that are considered **low-level concerns**. Allegations that meet the harms threshold include instances where a staff member, volunteer, or contractor has:

- **Behaved in a way that has harmed** or may have harmed a child.
- **Possibly committed a criminal offence** against or related to a child.
- **Behaved in a way that suggests they pose a risk of harm** to children.

- **Behaved inappropriately** or in a way that indicates they may not be suitable to work with children.

Local Authority Designated Officer (LADO):

The **LADO** will be involved in the management and oversight of cases where there are allegations against individuals who work with children. The LADO provides **advice and guidance**, liaises with the **police** and other agencies, and monitors cases to ensure they are handled quickly, fairly, and consistently.

Reporting Allegations:

- **Safeguarding concerns and allegations** about staff, including supply teachers, volunteers, and contractors, must be reported **immediately** to the **Headteacher**.
- If the allegation involves the **Headteacher**, it should be reported to the **Chair of Senior Leads** or their equivalent.
- The **LADO** must be informed within **one working day** of all allegations that come to the attention of the AEP or are reported directly to the police.

Referral to the Disclosure and Barring Service (DBS):

If an AEP removes an individual from regulated activity (e.g., working with children) or would have removed them had they not left first due to a safeguarding concern, the AEP **must make a referral** to the **Disclosure and Barring Service (DBS)**. Failing to make a referral without good reason is an offence.

Handling Low-Level Concerns:

- **Low-level concerns**, which do not meet the harm threshold, will be managed in line with the **Managing Allegations Against Staff and Low-Level Concerns** procedure provided by Nottingham City/ County Local Authority.
- **Record keeping** of such concerns is crucial, and early intervention will be included in **safeguarding training** for all staff, as per the guidance in *Keeping Children Safe in Education*.

2.14. Suspensions and Exclusions

(To be read in conjunction with the Suspensions and Exclusions Policy for CST AEP)

In the rare instances where **suspension** or **exclusion** of a pupil is considered at CST AEP, the **welfare of the pupil** is always the paramount concern. The AEP is committed to ensuring that all decisions are made fairly, lawfully, and in the best interest of the child. The following legal duties will be observed:

Key Considerations for Suspensions and Exclusions:

- **Children Act 1989**: The AEP will consider whether a **statutory assessment** should be undertaken in line with the principles of the Children Act 1989, ensuring that the child's **welfare** is protected throughout the process.

- **Equality Act 2010**: All decisions will be made in an **anti-discriminatory manner**, ensuring that no pupil is treated unfairly based on race, disability, gender, or other protected characteristics. The AEP will have due regard to the **SEND Code of Practice** to ensure that pupils with **Special Educational Needs and Disabilities (SEND)** are properly supported.
- **Human Rights Act 1998**: The AEP will ensure that its actions take into consideration the **rights of the pupil** under the Human Rights Act, ensuring that all interventions are lawful, fair, and proportionate.

Consistency with Statutory Guidance:

- **Interventions** related to suspensions and exclusions will be carried out in line with the statutory guidance on **School suspensions and permanent exclusions** provided by the government: school suspensions and permanent exclusions https://www.gov.uk/government/publications/school-exclusion

Actions to Take for Suspensions and Exclusions

When CST AEP is considering the **suspension or exclusion** of a child or young person (CYP), particularly those with additional safeguarding concerns or those with an **Education, Health and Care Plan (EHCP)**, specific actions will be taken to ensure the child's **welfare** remains the highest priority:

*1. **Assessment of Need with Multi-Agency Partners**:*

- An **assessment of need** will be conducted in collaboration with **multi-agency partners** (such as social care, health services, and education professionals) to mitigate any identified **risk of harm**.
- This assessment will align with the child's **EHCP** to ensure that all aspects of the child's educational and welfare needs are taken into account.

*2. **Multi-Agency Risk Assessment for Children with a Child Protection Plan**:*

- If the CYP is **subject to a child protection plan** or there is an existing **child protection file**, the AEP will convene a **multi-agency risk-assessment meeting** before deciding on suspension or exclusion.
- This meeting will allow all relevant professionals to assess the potential risks and ensure that any decision prioritises the child's safety and well-being.

*3. **Immediate Exclusions for Serious Incidents**:*

- In cases where a **one-off serious incident** results in an immediate decision to exclude the pupil, a **risk assessment** must be completed **before** convening a meeting of the **governing body**.
- This ensures that the **Senior Leads** has all the necessary information to make an informed decision based on the potential risks to the child and others involved.

2.15. Children Absent from Education

(To be read in conjunction with the Attendance Policy)

Absence from AEP can be an important warning sign of **safeguarding issues**, including **neglect**, **Child Sexual Exploitation (CSE)**, and **Child Criminal Exploitation (CCE)**, particularly related to **county lines** activities. CST AEP recognises the need for a proactive response to **persistent absences** to help identify and prevent abuse and mitigate the risk of pupils becoming absent from education in the future.

Monitoring and Reporting Absences:

- **Staff Responsibility**: Staff will carefully monitor pupils who are absent, especially those with **repeat absences** or **prolonged periods** away from AEP. Absences will be reported to the **Designated Safeguarding Lead (DSL)** following normal safeguarding procedures, in line with the AEP's **attendance procedures** and the **Children Absent from Education Policy**.
- **Local Authority Notification**: The AEP is required to notify the **local authority** in the following cases:
    - When a pupil fails to attend AEP **regularly**.
    - When a pupil has been absent without the AEP's permission for a continuous period of **10 school days** or more.

Guidance and Procedures:

- **Children Missing Education (2016)**: CST AEP will adhere to the procedures outlined in the **Children Missing Education (2016)** guidance to ensure appropriate action is taken when pupils are absent.
- **Local Authority Support**: The AEP will engage with **Nottingham City/ County Council Child Missing from Education** service to track and support pupils who are absent from education.

Safeguarding and Attendance:

- **Safeguarding Concerns**: When absences indicate possible safeguarding concerns, CST AEP will follow the **DfE's guidance on improving School attendance**. This may involve working with **children's services** to address underlying issues contributing to absenteeism.
    - Guidance on improving attendance can be found here: https://www.gov.uk/government/publications/working-together-to-improve-school-attendance

2.16. Elective Home Education

(To be read in conjunction with the Admissions Policy)

When a parent chooses **Elective Home Education (EHE)** for their child, CST AEP has a responsibility to notify the **Local Authority**. The AEP recognises that this decision can have implications for the safeguarding of the child, and steps must be taken to ensure the child's welfare is monitored.

Key Actions:

- **Local Authority Notification**: The AEP will notify the **Local Authority Elective Home Education service** for every pupil whose parents have decided to **educate at home**.
- **Sharing Safeguarding Files**: Any relevant **safeguarding files** will be shared with the Local Authority to ensure that the child's welfare continues to be monitored.
- **Children's Social Care Support**: In line with the **Children Act 1989**, the AEP will consider whether additional support from **children's social care** is necessary when a child is home-

educated. This consideration is especially important if there are any existing safeguarding concerns or vulnerabilities.

2.17. Responding to Incidents of Child-On-Child Harm

Child-on-child abuse refers to incidents of abuse between children, including online abuse. CST AEP takes all such incidents seriously and addresses them under the safeguarding and behaviour policies. It is essential to recognise that children can abuse their peers, and such incidents require a careful, proportionate response to ensure the well-being of all involved.

Key Principles:

- **Zero Tolerance for Abuse**: CST AEP operates with a **zero-tolerance** approach to abuse. Inappropriate behaviour between CYP (Children and Young People) will never be dismissed as "banter" or "part of growing up."
- **Awareness and Vigilance**:
    - **All staff** must be aware that child-on-child abuse can occur between pupils of any age, gender, and both inside and outside of AEP, including online.
    - **All staff** must recognise the indicators of child-on-child abuse and know how to respond.
    - Even if no cases are reported, staff should not assume child-on-child abuse is not happening.
- **Professional Responsibility**: **All staff** are expected to challenge inappropriate behaviour, and report concerns to the **DSL** immediately.
- **Preventative Education**: Despite a zero-tolerance approach, CST AEP takes proactive steps to educate pupils, promoting a culture where unacceptable behaviours and abuse are not normalised. This includes early identification of vulnerabilities to child-on-child harm through regular reviews of **attendance, behaviour, attainment, and safeguarding records**.

Types of Child-On-Child Abuse:

- **Bullying**, including cyberbullying and prejudice-based or discriminatory bullying.
- **Abuse in intimate personal relationships** between peers.
- **Physical abuse**, which may have an online element that facilitates or encourages harm.
- **Sexual violence**, which may include online elements.
- **Sexual harassment**, both online and in-person.
- **Non-consensual sexual activity** or forcing someone to engage in sexual activity.
- **Sharing of nude or semi-nude images or videos** (consensual or non-consensual).
- **Upskirting**.
- **Initiation or hazing** rituals involving abuse or humiliation, sometimes with an online component.

Initial Response to Reports of Child-On-Child Harm:

- **Immediate Safety**: Ensure the safety of the pupils involved in the incident and provide support to other affected pupils.
- **Listening to the Child**:
    - **Non-judgmental listening** is crucial. Boundaries should be clear, and staff should not ask leading questions. **Open-ended questions** like "Where? When? What?" should be used.

    - Victims must never be made to feel as though they are **creating a problem** by reporting abuse. The reporting process should not result in feelings of shame.
- **Consider the Child's Wishes**: The child's wishes should be taken into account when determining the intervention, and actions should focus on ensuring the safety of all affected.
- **No Promises of Confidentiality**: Staff must not promise confidentiality, as the information will likely need to be shared with others to safeguard the child.

Actions Following a Report:

- **Risk Assessments**: Risk assessments will be carried out to ensure the safety of all pupils involved and to address contextual risks. These should involve the child, parents, and carers and be reviewed regularly.
- **Record Keeping**: All reports, including initial concerns, should be logged on the AEP documentation system.
- **DSL Involvement**: The **Lead DSL** or **Deputy DSL** will assess the situation and decide on the appropriate course of action. The **Brook - Sexual Behaviours Traffic Light Assessment Tool** may be used to assess the level of risk. However, any level of concern will be reported to the commissioner of the work.

Addressing Sexual Violence and Harassment:

- **Referral to Police**: Incidents of **sexual violence** (such as rape, assault by penetration, or sexual assault) will be reported to the **police** regardless of the age of criminal responsibility.
- **Referral to Social Care**: If a statutory assessment is required under **Section 17** or **Section 47** of the **Children Act 1989**, a referral will be made to **social care**.
- **Online Abuse**: If the incident involves an **online element**, the AEP will follow government guidance on **searching, screening, and confiscation** and the advice on **sharing nudes and semi-nudes** provided by the government.

Contextual Safeguarding Approach to Child-on-Child Harm

CST AEP adopts a **contextual safeguarding approach** to minimise the risk of **child-on-child abuse**. This involves addressing the various environments in which harm can occur, such as the **AEP setting**, **peer groups**, and the **neighbourhood**.

- Following incidents of child-on-child harm, the **DSLs** will review the circumstances and identify any **lessons learned**. This could lead to adjustments in:
    - **Staffing and supervision**.
    - **Physical environment** changes.
    - **Curriculum updates**, particularly around safeguarding topics.

By making these adjustments, the AEP creates a safer environment and reduces the risk of future harm.

2.18. Mental Health and Wellbeing

AEPs play a key role in supporting the **mental health and wellbeing** of pupils. Mental health problems can sometimes indicate that a **child or young person (CYP)** has experienced or is at risk of experiencing **abuse, neglect, or exploitation**, or that they may require **early help**.

Key Commitments:

- **Early Identification of Mental Health Vulnerabilities**: The AEP will regularly review **attendance, behaviour, attainment**, and **safeguarding records** (at least termly) to identify pupils who may be vulnerable to mental health issues.
- **Pupil Reporting**: Pupils will have clear channels to **report concerns**, as outlined in **Section 2.7** of this policy.
- **Safeguarding Process**: Staff will follow the AEP's safeguarding procedures when concerns are raised, ensuring the **DSL** or **Deputy DSLs** can assess for any other vulnerabilities and offer proportionate support.
- **Immediate Health and Safety**: In cases of **acute mental health distress**, staff will take immediate action to ensure the pupil's safety, including contacting **emergency services (999)** if necessary.
- **Multi-Agency Working**: The **DSLs/Deputy DSLs** will consider whether the case can be managed internally, through **early help**, or if it requires the involvement of external agencies, as outlined in **Section 2.10** on multi-agency working.
- **Collaboration with Pupils and Families**: The AEP will work with the pupil and their **parents/carers** to ensure that interventions are in the **best interest** of the child or young person.
- **Educational Support**: **DSLs** will collaborate with staff to ensure that appropriate **reasonable adjustments** are made to help the pupil achieve positive educational outcomes.
- **No Diagnosis by Staff**: While staff will not attempt to diagnose mental health problems, they are encouraged to identify **behavioural indicators** that suggest a pupil may be experiencing or at risk of developing mental health issues. **Trained mental health professionals** will be engaged for formal diagnoses.
- **Access to Specialist Advice**: **DSLs** and the **SLT** (Senior Leadership Team) will have access to specialist advice and support through targeted services or their **locality teams**.

Contextual Safeguarding Approach to Mental Health:

CST AEP will ensure that preventative measures are embedded in the curriculum, providing opportunities for pupils to recognise when they may need help and to build **resilience**.

The AEP will adopt a **whole-AEP approach** by:

- Delivering **high-quality teaching** that supports wellbeing as part of the curriculum.
- Fostering a **culture** that actively promotes mental health and wellbeing.
- Creating an **environment** that supports positive mental health and wellbeing for both staff and pupils.
- Ensuring all pupils and staff are aware of a range of **mental health services**.
- Supporting **staff wellbeing**.
- Committing to **pupil and parent participation** in mental health initiatives and services.

2.19. Online Safety and Personal Electronic Devices

(To be read in conjunction with the AEP's E-Safety Policy)

CST AEP recognises the importance of safeguarding children and young people (CYP) from potentially harmful and inappropriate online content. The AEP adopts an **approach** to online safety to **protect** and **educate** pupils and staff in the safe use of technology and to ensure mechanisms are in place to identify, intervene in, and escalate concerns appropriately.

Key Commitments:

- **Broad and Balanced Curriculum**: All pupils will be made aware of **online risks** and taught how to stay safe online as part of their curriculum.
- **Policy Integration**: Online safety will be interwoven into relevant policies, procedures, and safeguarding training for staff, as well as in the safeguarding curriculum for learners.
- **Addressing Online Child-on-Child Abuse**: Recognising that **child-on-child abuse** can occur through **mobile and smart technology**, the AEP will respond to such incidents using the same process outlined in **Section 2.17: Responding to Incidents of Child-on-Child Harm**, and in line with the AEP's **Mobile Phones and Cameras Policy**.
- **Remote Learning**: All remote learning will comply with governmental guidance on online safety.
- **Regular Review of Safeguarding Measures**: The effectiveness of the AEP's ability to safeguard pupils through **filtering and monitoring systems**, **information security**, and **access management** will be regularly reviewed.
- **No Phone Zone**: CST AEP operates as a **No Phone Zone**, restricting the use of personal mobile devices on-site.

Staff Training and Responsibilities:

- **Recognising Online Risks**: Through training, all staff members will be made aware of pupil attitudes and behaviours that may indicate a risk of **online harm**.
- **Reporting Concerns**: Staff will be trained on the **procedure to follow** when they have concerns about a pupil's online activity, ensuring any potential harm is addressed promptly.
- **Filtering and Monitoring**: Staff will be familiar with the **filtering and monitoring systems** in place to protect pupils and how to escalate concerns when they are identified.
- **Induction**: During staff induction, expectations and responsibilities relating to **filtering and monitoring systems** will be clearly outlined.

Filtering and Monitoring Systems:

When pupils access the AEP's network, they are protected by **filtering and monitoring systems** designed to block inappropriate content. The AEP acknowledges that many pupils also have access to the internet via personal devices. To address this:

- The **wider curriculum** and policies, such as the **Mobile Phone Policy**, ensure that pupils are educated on the risks of online activity using personal devices.

Senior Leads Responsibilities:

- The **Senior Leads** will ensure that appropriate **filters and monitoring systems** are in place and will regularly review their effectiveness, assigning clear roles and responsibilities for safeguarding through technology.

Compliance with Digital and Technology Standards:

CST AEP ensures it meets the **Digital and Technology Standards** outlined in the Department for Education's (DfE) publication: Meeting digital and technology standards in AEPs.

Communicating with Parents

CST AEP recognises the importance of keeping **parents informed** about the online safety measures in place for pupils. Regular communication will be maintained with parents to:

- **Reinforce the importance of online safety** for pupils.
- Provide details on the **systems the AEP uses to filter and monitor online use**.
- Clearly explain to parents **what their children are being asked to do online** as part of AEP activities.

Reviewing Online Safety

CST AEP will conduct an **annual review** of its approach to online safety. This will include an **annual risk assessment** to reflect and address the specific **risks faced by pupils** in the digital environment.

Personal Electronic Devices

The use of **personal electronic devices**, including mobile phones and cameras, by both staff and pupils is closely monitored. The following procedures are in place:

- **Photographs and Videos**: The AEP will carefully plan the use of photographs and videos of pupils, ensuring proper **consent** is obtained and adhering to the **GDPR** and **Data Protection Policy**.
    - The **Data Protection Officer (DPO)** will oversee any events where photographs or videos are taken.
    - Special consideration will be given to **LAC pupils (Looked After Children)**, **adopted pupils**, and pupils for whom there are **security concerns**. The lead **teacher** and **DSL** will liaise with the necessary professionals (e.g., social workers, carers) to ensure these pupils' safety.
- **Reporting Concerns**: Staff are required to report any concerns about the inappropriate use of personal electronic devices by pupils or other staff members to the **DSL**, following appropriate safeguarding procedures.

Upskirting

Under the **Voyeurism (Offences) Act 2019**, **upskirting** is a criminal offence. CST AEP has a **zero-tolerance policy** toward upskirting, which includes the use of motion-activated or hidden cameras.

- Any incidents of upskirting will be **immediately reported** to the **DSL**, who will determine the next steps, potentially involving **police action**.

Consensual and Non-Consensual Sharing of Indecent Images and Videos

CST AEP recognises the need to treat the **consensual and non-consensual sharing** of nude and semi-nude images or videos (commonly referred to as "**sexting**" or youth-produced sexual imagery) as a **safeguarding concern**.

Key actions include:

- **Training for Staff**: Staff will receive training to understand **child sexual development**, how to differentiate between **normal** and **inappropriate** sexual behaviour, and how to handle incidents of sharing nudes and semi-nudes within the AEP community.
    - Training will cover the **motivations** behind this behaviour, how to **assess risks** posed to pupils, and when and how to **report** incidents.
- **Legal Considerations**: Staff will be made aware that the creation, possession, and distribution of **indecent images** of children is a **criminal offence**, even if the imagery is self-produced by the pupil. However, care will be taken to ensure pupils are not **unnecessarily criminalised**.
    - Staff will also be aware of the laws applying to **digitally manipulated** and **AI-generated** imagery of nudes or semi-nudes.
- **Referral to DSL**: If a staff member becomes aware of an incident involving the sharing of nudes or semi-nudes, they must report it to the **DSL** as soon as possible. The **DSL** will work to **support the affected pupils** and inform them of the steps to remove or prevent the further sharing of these images online.

Site Security

CST AEP prioritises **site security** to ensure the safety of pupils, staff, and visitors. The AEP implements a structured system for monitoring visitors to the premises.

Visitor Procedures:

- **Sign-In and Badging**: All visitors to the AEP, including **contractors**, are required to **sign in** at the reception and will be issued a **visitor's badge**, which confirms they have permission to be on site.
- **Exceptions**: Parents who are delivering or collecting their children **do not need to sign in**.
- **Observation of Regulations**: All visitors are expected to observe the AEP's **safeguarding** and **health and safety regulations** during their time on site.
- **Escorting and Supervision**: The **lead teacher** will use **professional judgement** to determine whether any visitor should be **escorted or supervised** while on the AEP premises.

Risk Assessments:

- The AEP will implement relevant **risk assessments** in accordance with **DfE/statutory guidance**.
- A **Site Security Risk Assessment** will be completed to ensure that security measures are up to date and effective.

Policy Review and Updates:

- This policy will be **reviewed annually** by the **DSL** and the **managing director**. However, it may be updated as needed to reflect emerging safeguarding issues and lessons learned.
- **Staff Communication**: Any changes made to this policy will be **communicated** to all members of staff. Staff are required to familiarise themselves with the processes and procedures outlined in this policy as part of their **induction**.

Long Form Descriptions

*CCE – **Child Criminal Exploitation***

A form of abuse where an individual or group takes advantage of an **imbalance of power** to coerce, manipulate, or deceive a child into participating in **criminal activity**. This may be in exchange for something the victim needs or wants, for the **financial or other advantage** of the perpetrator, and/or through **violence or threats** of violence.

*CSE – **Child Sexual Exploitation***

A form of sexual abuse in which an individual or group takes advantage of an **imbalance of power** to coerce, manipulate, or deceive a child into engaging in **sexual activity**. This is typically in exchange for something the victim needs or wants or for the **financial advantage, increased status**, or other benefit to the perpetrator. **Violence or threats** may also be used.

*EHCP – **Education, Health, and Care Plan***

A **funded intervention plan** for pupils with significant needs that impact their learning and access to education. This plan coordinates **educational, health, and care needs** and outlines the additional support and interventions required, as well as the expected outcomes for the pupil.

Part 3 - Appendices

Appendix A - Acronyms

This policy contains several acronyms used in the education sector. These acronyms are defined as follows:

- **C/ASC** – **Children/Adults Social Care**
  The branch of the local authority responsible for children's or adult's social care.
- **DBS** – **Disclosure and Barring Service**
  The statutory body that performs criminal record checks for individuals working or volunteering in AEPs.
- **DfE** – **Department for Education**
  The UK government body responsible for children's services, education policy, and the management of education institutions, from early years to higher and further education.
- **DPO** – **Data Protection Officer**
  The appointed individual responsible for overseeing data protection strategy and compliance with the **UK GDPR** and **Data Protection Act**.
- **DSL** – **Designated Safeguarding Lead**
  A senior staff member with lead responsibility for **safeguarding** and **child protection** within the AEP.
- **DDSL** – **Deputy Designated Safeguarding Lead**
  A senior staff member who supports the **DSL** and may assume responsibility for **safeguarding** and **child protection** in their absence.
- **FGM** – **Female Genital Mutilation**
  The practice of **partial or total removal** of external female genitalia, which is illegal in the UK and recognised as a form of child abuse with long-term harmful consequences.

- **UK GDPR** – **UK General Data Protection Regulation**
  Legislation governing the protection and security of personal data in the UK, ensuring that organisations handle personal data fairly and consistently.
- **HBA** – **'Honour-Based' Abuse**
  Crimes committed to defend the **honour** of a family or community, often involving violence or coercion.
- **HMCTS** – **HM Courts and Tribunals Service**
  The executive agency responsible for administering **criminal, civil, and family courts** and **tribunals** in England and Wales, under the **Ministry of Justice**.
- **AI** – **Artificial Intelligence**
  Computer systems and software designed to perform tasks that typically require **human intelligence**, such as decision-making or the generation of images.

LGBTQ+ – ***Lesbian, Gay, Bisexual, Transgender, and Queer Plus***

A term used to describe a community of people who identify as **lesbian**, **gay**, **bisexual**, **transgender**, or **queer**, including other sexual or gender identities. These individuals are protected under the **Equality Act 2010**.

LSCP – ***Local Safeguarding Children Partnerships***

A safeguarding body established under **Working Together Transitional Statutory Guidance**, replacing the former **Local Safeguarding Children Boards (LSCBs)**. LSCPs coordinate multi-agency safeguarding services, facilitate child safeguarding reviews, and ensure child death reviews.

NCSCP – ***Nottingham*** *City/ County* ***Safeguarding Children Partnership***

The local safeguarding arrangement in **Nottingham City/ County,** where partners and agencies work together to protect children, conduct local child safeguarding reviews, and scrutinise the effectiveness of local safeguarding arrangements.

SCR – ***Single Central Record***

A **statutory secure record** that contains recruitment and identity checks for all AEP staff, including permanent, temporary, and voluntary staff, as well as contractors, external coaches, and instructors.

KCSIE – ***Keeping Children Safe in Education***

The statutory guidance outlining AEPs' and colleges' duties to **safeguard and promote the welfare** of children.

LA – ***Local Authority***

A **local government agency** responsible for providing services such as education, children's services, and social care within a specific geographical area.

LAC – ***Looked-After Children***

Children who have been placed in the care of the **local authority** for more than 24 hours. LAC are also known as children in care.

*NPCC – **National Police Chiefs' Council***

The **national coordination body** for law enforcement in the UK, representing police chief officers and facilitating cooperation on national police issues.

*PLAC – **Previously Looked-After Children***

Children who were previously under **local authority care** but have since left care (e.g., due to adoption or other permanent arrangements). PLAC are also known as **care leavers**.

*PSHE – **Personal, Social, and Health Education***

A **non-statutory subject** in which pupils learn about themselves, their relationships, rights, responsibilities, and their interactions with others.

*RSHE – **Relationships, Sex, and Health Education***

A **compulsory subject** from Year 7 that teaches pupils about **sexual health**, **reproduction**, **sexuality**, and the development of **positive relationships**.

*SLT – **Senior Leadership Team***

The team of senior staff members who have been delegated **leadership responsibilities** within the AEP.

*TRA – **Teaching Regulation Agency***

An **executive agency** of the Department for Education (DfE) responsible for the **regulation of the teaching profession** in England.

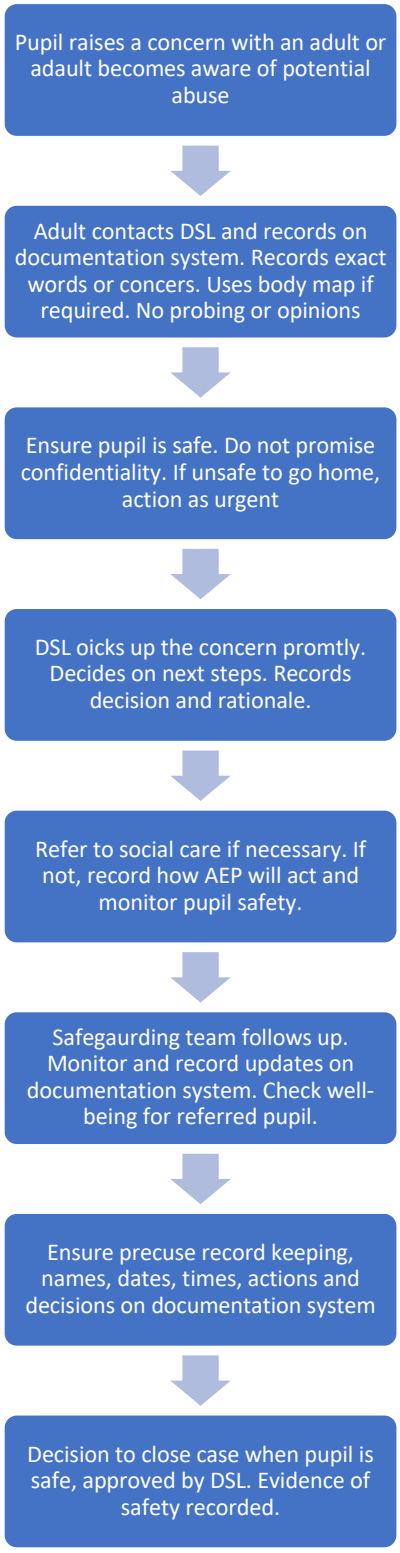
*VSH – **Virtual** AEP **Head***

*A designated individual responsible for promoting the **educational achievement** of children who are **looked after** by the local authority or those who have a social worker, both currently a IICSA – **Independent Inquiry into Child Sexual Abuse***

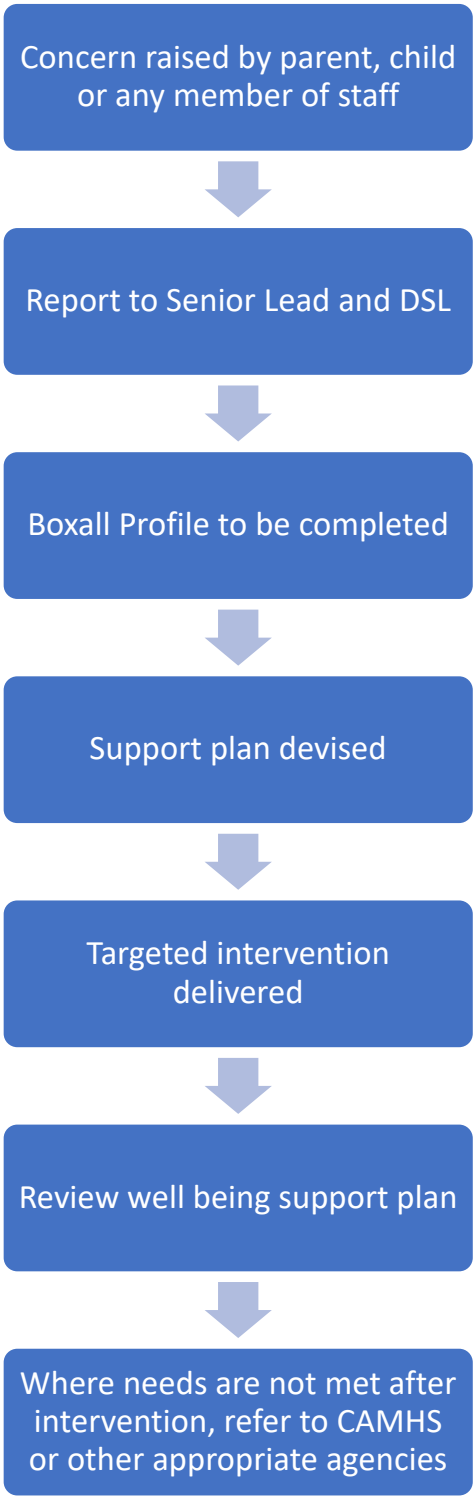
The **Independent Inquiry into Child Sexual Abuse** investigates the nature and extent of sexual abuse of children in institutional settings. The inquiry analyses case files from the **Disclosure and Barring Service (DBS)** to understand the behaviours of perpetrators and the institutional responses to those behaviours. This work aims to provide insight into how abuse has occurred and how institutions can improve their safeguarding practices to protect children from such harm in the future.

Reporting Concerns

Flowchart for Reporting Safeguarding Concerns



Flowchart for Responding to Mental Health Concerns and Child-on-Child Abuse



Indicators of Abuse

All AEP staff should be aware that **abuse**, **neglect**, and **safeguarding issues** are rarely isolated events that fit under a single label. In many cases, multiple issues overlap, and a holistic approach to identifying and responding to these concerns is required.

Abuse:

Abuse involves the **maltreatment** of a child, either by **inflicting harm** or by **failing to act** to prevent harm. Children may be abused in various settings, including:

- **Family** environments
- **Institutional or community** settings
- **Online** environments, where technology is used to facilitate abuse.

Abuse can be perpetrated by adults or peers (other children) and may occur offline or entirely online.

Types of Abuse:

1. **Physical Abuse**:
    - Physical abuse involves actions such as:
        - **Hitting**, **shaking**, **throwing**
        - **Poisoning**, **burning**, or **scalding**
        - **Drowning** or **suffocating**
    - Physical harm can also occur when a parent or caregiver **fabricates** or **induces** illness in a child.

    Risk Factors:

    - Physical abuse can happen in any family but may be more likely in cases where:
        - Parents have issues with **substance abuse**, including **drugs** or **alcohol**.
        - Parents experience **mental health problems**.
        - There is a history of **domestic abuse** in the household.
        - **Babies** and **disabled children** may be particularly vulnerable to physical abuse due to their increased dependency and potential communication difficulties.

Some of the Following May Be Signs of Physical Abuse:

1. **Unexplained Injuries**:
    - **Bruises**, **burns**, **bites**, or **scalds** that do not seem to match the explanation given.
    - **Fractures** or broken bones, particularly if they occur repeatedly or at different stages of healing.
    - **Marks** or injuries that form a pattern, such as from a hand or belt, or that are unlikely to be caused by accidents.
2. **Inconsistent Explanations**:
    - Parents or caregivers may provide **conflicting or unclear explanations** for how the injuries occurred.

    - The child may give **different accounts** of what happened or be hesitant to explain the injury.
3. **Frequent Absences**:
    - **Regular absences** from AEP, especially if the child is frequently absent after a weekend or holiday.
    - Parents may keep the child home to **hide injuries** or avoid detection.
4. **Wearing Concealing Clothing**:
    - The child may wear **long sleeves or pants**, even in warm weather, to **hide bruises** or injuries.
5. **Fear of Physical Contact**:
    - The child may **flinch**, appear **frightened** or **nervous**, or withdraw when touched or approached.
    - Reluctance to go home or extreme fear of certain individuals.
6. **Behavioural Changes**:
    - **Aggressive** or **withdrawn** behaviour, depression, or anxiety.
    - Unexplained changes in mood or social interactions, including **lack of trust** in adults.
7. **Frequent Visits to the Hospital**:
    - **Repeated hospital visits** or medical attention for injuries, especially if they seem to occur regularly or in different areas of the body.
8. **Developmental Delays**:
    - Signs of **developmental delay** or regression in skills, which can result from untreated injuries or trauma.

These signs do not necessarily mean that a child is being physically abused, but they may warrant further attention or inquiry, particularly if several signs are present or if the child shows patterns of unexplained injuries. It is important that any concerns are reported to the **DSL** for further investigation.

Emotional Abuse:

Definition: Emotional abuse involves the **persistent emotional maltreatment** of a child, leading to **severe adverse effects** on their emotional development. Unlike physical abuse, the signs may be harder to recognise initially, but the impact can be profound and long-lasting.

Forms of Emotional Abuse:

1. **Conveying Worthlessness**:
    - Telling a child they are **worthless**, **unloved**, or **inadequate**.
    - Valuing the child only in terms of meeting another person's needs, making them feel like their worth is conditional.
2. **Limiting Expression**:
    - **Silencing** the child or **mocking** them for their thoughts, feelings, or how they communicate.
    - Not giving the child opportunities to express themselves or participate in normal conversations.
3. **Imposing Inappropriate Expectations**:
    - Forcing the child to meet **age-inappropriate responsibilities** or interact in ways that are beyond their **developmental capacity**.
    - Overprotection, limiting the child's opportunities to **explore**, **learn**, or interact socially.
4. **Witnessing Harm to Others**:

- Exposing the child to **domestic abuse**, allowing them to see or hear the ill-treatment of another person, causing them distress and fear.

5. **Bullying and Cyberbullying**:
   - **Serious bullying**, whether face-to-face or through online channels, can make a child feel **frightened**, **unsafe**, or **in danger**. This includes repeated emotional harm through ridicule, threats, or isolation.
6. **Exploitation and Corruption**:
   - Using the child for **inappropriate purposes** or subjecting them to **corrupting influences** that harm their emotional well-being.

Recognising Emotional Abuse:

- Emotional abuse may not show **immediate physical signs**, but it can manifest in a child's **behaviour** or in the way they are treated by a parent or caregiver. For example:
  - **Constant criticism** or **belittling** remarks.
  - A child who is **fearful of expressing themselves** or frequently appears **withdrawn**, **anxious**, or **depressed**.
  - **Overly controlled** or restricted behaviour, with little opportunity for play, learning, or socialising.
  - A **lack of warmth** or affection between the child and caregiver.

Note: Emotional abuse may occur alongside other forms of abuse but can also occur independently. Practitioners should be vigilant in observing interactions between children and caregivers, and take note of **persistent negative patterns** in behaviour or emotional health.

Some of the Following Signs May Be Indicators of Emotional Abuse:

1. **Developmental Delays**:
   - A child may show **delays in physical, emotional, or cognitive development**, such as falling behind in AEP or struggling with speech, motor skills, or social interactions.
2. **Low Self-Esteem**:
   - The child may exhibit **low self-confidence** or **feelings of worthlessness**, constantly apologising or showing fear of failure.
   - They may express beliefs that they are **unloved**, **inadequate**, or not good enough.
3. **Emotional Withdrawal**:
   - The child may be **emotionally unresponsive**, avoiding interactions, or showing **little interest in play**, friendships, or social activities.
   - They may be **isolated** or reluctant to engage with others.
4. **Excessive Compliance or Passivity**:
   - The child may exhibit **extreme compliance**, **obedience**, or **passivity**, being overly eager to please or fearful of making mistakes.
   - They may avoid conflict at all costs and show **excessive deference** to adults.
5. **Aggression or Hostility**:
   - Conversely, some children may react to emotional abuse by becoming **aggressive** or **hostile**, showing **anger** or **frustration** in interactions with peers or adults.
   - **Bullying** or **intimidating** behaviour may also develop as a coping mechanism.
6. **Inappropriate Emotional Responses**:
   - A child may show **disproportionate emotional responses** to everyday situations, such as **overreacting to minor frustrations** or remaining unaffected by distressing events.

    - The child may **struggle to express emotions** appropriately or show signs of emotional instability.
7. **Fearfulness**:
    - The child may appear **fearful of certain people**, environments, or situations, showing **anxiety** or **reluctance** to go home.
    - There may be visible signs of **nervousness**, such as flinching or withdrawing from physical contact.
8. **Lack of Attachment**:
    - The child may seem to lack a **secure attachment** to their caregiver, showing **little warmth** or affection towards them.
    - Conversely, they may display **excessive attachment** to caregivers, becoming clingy or fearful of separation.
9. **Sudden Changes in Behaviour**:
    - Emotional abuse may cause **rapid shifts in behaviour**, such as going from being outgoing and confident to withdrawn and anxious, or from calm to aggressive.
10. **Difficulty Forming Relationships**:
    - The child may have **difficulty forming friendships** or maintaining healthy relationships with peers.
    - They may **struggle to trust** others or experience problems with **social interaction**.
11. **Self-Harm or Risky Behaviours**:
    - Some children may **self-harm**, engage in **risky behaviours**, or exhibit signs of depression or anxiety as a result of emotional abuse.

It's important for staff to observe and report any concerning signs to the **DSL** or safeguarding team. Emotional abuse often leaves **lasting scars** and may require **early intervention** to mitigate its effects.

Sexual Abuse:

Definition: Sexual abuse involves **forcing or enticing** a child or young person to participate in **sexual activities**, regardless of whether violence is involved or if the child understands what is happening. This form of abuse can take place both in **physical and non-physical** ways.

Types of Sexual Abuse:

1. **Physical Contact**:
    - **Assault by penetration**: This includes acts such as **rape** or **oral sex**.
    - **Non-penetrative acts**: These include actions like **masturbation**, **kissing**, **rubbing**, and **touching** outside of the child's clothing.
2. **Non-Contact Activities**:
    - **Sexual imagery**: Involving a child in the creation or viewing of **sexual images**, such as photographs or videos.
    - **Watching sexual activities**: Encouraging or coercing the child to view sexual acts.
    - **Sexual grooming**: Preparing a child for sexual abuse through **manipulation** or **coercion**.
    - **Inappropriate sexual behaviour**: Encouraging or forcing the child to behave in **sexually inappropriate ways**.

Characteristics of Sexual Abuse:

- Sexual abuse does not always involve **physical force** or violence. Perpetrators may use **coercion, manipulation**, or **grooming** to engage children in sexual activities.

- Children may be **unaware** that the acts are abusive or wrong, and they may feel **confused** or **guilty** about the situation.
- Sexual abuse can occur in **person** or through **online environments**, such as via messaging, video calls, or the sharing of explicit materials.

Grooming:

- Grooming is the process where an abuser builds a **trusting relationship** with a child and sometimes their family in order to **gain access** to the child and **lower their inhibitions** to prepare them for sexual abuse. Grooming can occur **online** or **offline** and may include **gifts**, **attention**, or **affection** as tools to manipulate the child.

It is important that all concerns related to sexual abuse are treated with the utmost seriousness and reported to the **Designated Safeguarding Lead (DSL)** or appropriate authorities immediately. Early detection and intervention are key to protecting children from further harm.

Key Points on Sexual Abuse:

- **Online and Offline Abuse**: Sexual abuse can occur **online**, where technology is used to **exploit** or **groom** children, and it can also be used to **facilitate offline abuse**. Perpetrators may use the internet to communicate with children, share inappropriate content, or arrange meetings with the intention of abuse.
- **Perpetrators**: Sexual abuse is not limited to **adult males**. **Women** can also perpetrate sexual abuse, and **children** can abuse other children. This is referred to as **peer-on-peer abuse** and is a **specific safeguarding issue** in education settings. AEPs and colleges must have **clear policies and procedures** to manage and address peer-on-peer sexual abuse.
- **Peer-on-Peer Abuse**:
    - Sexual abuse by other children requires careful attention and should be treated with the same seriousness as abuse perpetrated by adults.
    - All AEP staff must be aware of their AEP's policies and procedures for **dealing with peer-on-peer abuse** to ensure it is appropriately addressed.
- **Lack of Awareness Among Victims**: Many children who are victims of sexual abuse do not recognise themselves as such. This may be due to:
    - **Not understanding** what is happening.
    - Not recognising the behaviour as **abusive** or **wrong**.
    - **Grooming tactics** that may cause confusion or create a sense of **dependency** or **affection** towards the abuser.

Staff Responsibility:

- All staff should be aware that victims of sexual abuse may not easily **disclose** or recognise the abuse due to confusion, fear, or manipulation.
- It is critical to approach any disclosures or signs of sexual abuse with **sensitivity** and **without judgment**, ensuring that the child feels safe and supported.

Understanding these dynamics is essential for **early detection** and **appropriate intervention**, both in preventing abuse and in supporting children who may already be affected.

Some of the Following Signs May Be Indicators of Sexual Abuse:

1. **Inappropriate Sexual Knowledge or Behaviour**:

- A child displays **sexual knowledge** or uses language inappropriate for their age.
- Engaging in **sexually explicit behaviour** or acting out sexual activities with toys or other children.

2. **Fear of Physical Contact**:
   - The child shows an **aversion to physical contact** or becomes distressed when touched, even in a non-threatening way.
   - They may react fearfully to being around certain individuals or exhibit a **sudden fear of being alone** with certain people.
3. **Physical Signs**:
   - Unexplained **bruising**, **bleeding**, **pain**, or **discomfort** in the genital or anal areas.
   - **Torn** or **stained underwear** and difficulty in walking or sitting.
4. **Changes in Behaviour**:
   - **Sudden withdrawal** from friends or family, becoming **isolated** and **emotionally detached**.
   - The child may become **aggressive** or exhibit **anger** and **hostility** towards peers or adults.
   - Exhibiting signs of **anxiety**, **depression**, or **sudden mood swings**.
5. **Age-Inappropriate Relationships**:
   - Engaging in **age-inappropriate or sexually provocative relationships** with adults or peers.
   - Displaying an unusual interest in or **avoidance of sexual topics**.
6. **Regressive Behaviours**:
   - Reverting to **younger child behaviours** such as **bedwetting**, **thumb-sucking**, or **clinginess**.
   - Having **nightmares** or difficulty sleeping.
7. **Self-Harm or Risky Behaviours**:
   - **Self-harming behaviours** such as cutting, burning, or pulling out hair.
   - **Substance abuse** or engaging in other risky behaviours like running away or associating with unsafe individuals.
8. **Sudden Decline in AEP Performance**:
   - **Loss of interest** in AEP, deteriorating academic performance, or **frequent absences**.
   - Difficulty concentrating or appearing distracted.
9. **Eating Disorders or Sudden Weight Changes**:
   - Developing **eating disorders**, such as binge eating or anorexia, or experiencing sudden weight loss or gain.
10. **Wearing Excessive Layers of Clothing**:
    - The child may wear **layers of clothing** even in warm weather to **cover up** their body or feel protected.

Staff Response:

If any of these indicators are observed, it is crucial that staff **report the concerns immediately** to the **Designated Safeguarding Lead (DSL)**. Sexual abuse can leave **deep emotional and physical scars**, and early intervention can help prevent further harm.

Child Sexual Exploitation (CSE)

Definition: Child sexual exploitation is a form of **sexual abuse** where an individual or group takes advantage of an **imbalance of power** to coerce, manipulate, or deceive a child or young person (under the age of 19) into sexual activity. This may be:

- In exchange for something the victim **needs or wants**.
- For the **financial gain** or **increased status** of the perpetrator or facilitator.

Importantly, the child may appear to **consent** to the sexual activity, but they are still being **exploited**. CSE can occur without **physical contact**, often facilitated through **technology**.

Signs of Sexual Abuse:

- **Inappropriate knowledge or interest in sexual acts** for the child's age.
- Use of **sexual language** or **knowledge** beyond what is expected for their age.
- **Encouraging others** to engage in sexual behaviour or play sexual games.
- **Physical sexual health problems**, such as soreness in genital or anal areas, sexually transmitted infections (STIs), or underage pregnancy.

Indicators of Child Sexual Exploitation (CSE):

- Acquisition of **money, clothes, or phones** without a plausible explanation.
- **Gang association** or **isolation** from peers and social networks.
- **Exclusion** or **unexplained absences** from AEP, college, or work.
- **Running away** from home or care, persistently going missing or returning late without explanation.
- **Excessive texts or phone calls** from unknown individuals.
- **Returning home intoxicated** or under the influence of drugs.
- Displaying **inappropriate sexualised behaviour** for their age or contracting STIs.
- Evidence or suspicions of **physical or sexual assault**.
- **Relationships with older individuals** or groups, or controlling individuals.
- Multiple unknown **callers or visitors**, particularly adults or peers.
- **Frequenting areas known for sex work**.
- Concerning use of the **internet or social media**.
- **Increasing secretiveness** around behaviours and activities.
- **Self-harm** or **significant changes** in emotional well-being.

Vulnerabilities That Increase the Risk of CSE:

- Prior experiences of **neglect**, **physical**, or **sexual abuse**.
- Lack of a **stable home environment**, including exposure to **domestic violence**, **substance misuse**, **mental health issues**, or **criminality** in the family.
- Recent **bereavement** or **loss**.
- **Social isolation** or difficulties forming relationships.
- Lack of a safe environment to explore **sexual identity**.
- **Economic vulnerability**.
- Being **homeless** or in **insecure accommodation**.
- **Connections** with other young people being sexually exploited.
- Having family members involved in **adult sex work**.
- **Physical or learning disabilities**.
- Being in **care**, particularly in residential settings or having a history of interrupted care.
- Struggling with **sexual identity**.

Staff Responsibility:

Staff should be aware that CSE may present in a variety of forms, both online and offline, and can affect any child, regardless of background. It is important to remain vigilant for **signs of exploitation** and report concerns immediately to the **DSL** or appropriate safeguarding authorities.

Neglect

Definition: Neglect is the **persistent failure** to meet a child's **basic physical and/or psychological needs**, which can result in the **serious impairment** of the child's health or development.

Neglect may begin even before birth, for example, due to **maternal substance abuse** during pregnancy. Once a child is born, neglect can manifest as:

- Failing to provide **adequate food, clothing, and shelter** (including **abandonment** or **exclusion** from home).
- Failing to **protect a child from physical and emotional harm** or danger.
- Inadequate **supervision** or using **unsafe caregivers**.
- Failing to ensure access to **medical care** or treatment.
- Being **unresponsive** to a child's **basic emotional needs**.

Factors Contributing to Neglect:

- A parent or caregiver may become physically or mentally **unable** to care for a child.
- **Substance abuse** (alcohol or drugs) can impair the ability to care for and protect a child, and in some cases, **substance dependency** may lead to neglect, with parents prioritizing drugs or alcohol over basic needs such as food or clothing.

Signs That May Indicate Neglect:

1. **Unclean or Unsafe Living Conditions**:
    - Children living in homes that are **indisputably dirty** or **unsafe**.
2. **Poor Hygiene**:
    - Children who are frequently **hungry**, **dirty**, or **unkempt**.
3. **Inadequate Clothing**:
    - Children who do not have **appropriate clothing** for the weather, such as **not having a winter coat** during cold months.
4. **Dangerous Home Environment**:
    - Children living in homes where there is **substance abuse** (e.g., drugs or alcohol) or **violence**.
5. **Behavioural Changes**:
    - Children who are often **angry**, **aggressive**, or engage in **self-harm**.
6. **Lack of Basic Health Care**:
    - Children who **fail to receive medical care**, such as regular check-ups, vaccinations, or treatment for illnesses or injuries.
7. **Parental Neglect**:
    - Parents who fail to **seek medical treatment** when their child is ill or injured.

The Complex Nature of Neglect:

Neglect can often coexist with other forms of abuse, making it critical for practitioners to be **alert** and **proactive**. However, identifying neglect is not always straightforward, as it may manifest subtly over time. Practitioners must be mindful of the **cumulative** effects of neglect and act **early** to intervene.

Nottingham City Neglect Toolkit:

The **Nottingham City Neglect Toolkit** provides detailed guidance for identifying and addressing neglect, helping professionals assess the needs and risks for children and offering steps to take to **safeguard** their well-being. https://www.nottinghamcity.gov.uk/media/hxoftur0/neglect-toolkit-exemplar-b.pdf

Specific Safeguarding Issues

Domestic Abuse:

For the purposes of this policy, and in accordance with the **Domestic Abuse Act 2021**, domestic abuse is defined as **abusive behaviour** of one person towards another where both are aged **16 or over** and are **personally connected**. This includes any behaviour directed at others, such as a person's child.

Abusive behaviour includes:

- **Physical** or **sexual abuse**
- **Violent** or **threatening behaviour**
- **Controlling** or **coercive behaviour**
- **Economic abuse** (e.g., controlling finances)
- **Psychological** or **emotional abuse**

Personally connected individuals are those who:

- Are or have been **married** or agreed to be married to each other.
- Are or have been in a **civil partnership** with each other.
- Are or have been in an **intimate personal relationship**.
- Have or had a **parental relationship** towards the same child.
- Are **relatives**.

The AEP recognises the **impact of domestic abuse** on children, who may be considered **victims in their own right** if they see, hear, or experience the effects of domestic abuse. All staff must be aware of the signs of domestic abuse and follow appropriate **safeguarding procedures**.

Homelessness:

The **DSL** and **deputy DSLs** will be familiar with the **contact details and referral routes** into the **Local Housing Authority** to raise concerns about potential homelessness at an early stage.

Indicators that a family may be at risk of homelessness include:

- **Household debt**
- **Rent arrears**
- **Domestic abuse**
- **Anti-social behaviour**
- Any mention of a family moving because they **"have to"**.

Referrals to the **Local Housing Authority** do not replace referrals to **Children's Social Care Services (CSCS)** where a child is being harmed or is at risk of harm. For **16- and 17-year-olds**, homelessness may not be family-based, and referrals to **CSCS** will be made when appropriate.

Children Absent from Education:

Children who are absent from AEP may be showing a vital **warning sign** of safeguarding issues, including **neglect**, **child sexual exploitation (CSE)**, and **child criminal exploitation (CCE)**, especially **county lines**.

The AEP will:

- Respond to **persistent absences** to help identify and prevent the risk of **abuse** or **exploitation**.
- Monitor pupils who are **frequently absent** or have **prolonged absences**, and report concerns to the **DSL**.
- Inform the **Local Authority (LA)** of any pupil who fails to attend regularly or has been absent for **10 consecutive AEP days** without permission.

The AEP will follow **DfE guidance** on improving attendance, and work with **children's services** where AEP absences indicate safeguarding concerns.

For further details, refer to the **Children Absent from Education Policy** and **DfE Guidance**: Working Together to Improve AEP Attendance.

Admissions Register

The AEP will maintain an **accurate and up-to-date admissions register** and adhere to the following procedures:

Registering Pupils:

- Pupils are placed on the admissions register at the start of their agreed first day of attendance.
- The AEP will notify the **Local Authority (LA)** within **5 days** when a pupil's name is added to the admissions register.
- At least **two emergency contacts** will be held for each pupil where possible.

- The AEP will **monitor attendance** and notify the LA if a pupil does not attend on the agreed start date.

Changes to Pupil Information:

If a parent notifies the AEP that their child will be living at a different address, the following information will be updated in the admissions register:

- The **full name** of the parent with whom the pupil will live.
- The **new address**.
- The **date** from which the pupil will live at that address.

If a parent informs the AEP that their child will be attending a different AEP, the following details will be recorded:

- The **name of the new AEP**.
- The **date** on which the pupil started or will start attending the new AEP.

Data will be transferred securely using a **secure internet system** when a pupil moves to a new AEP.

Removing Pupils from the Admissions Register:

The AEP will notify the LA and remove a pupil from the register if:

- They have been **withdrawn by parents** for **home education**.
- They have ceased attending the AEP and no longer live within a **reasonable distance** of the premises.
- They have been certified by the AEP's **medical officer** as **unfit to attend**.
- They have been in **custody** for more than four months, and the AEP does not reasonably believe they will return after the period.
- They have been **permanently excluded**.
- The AEP and LA have been unable to locate the pupil's whereabouts after making **reasonable enquiries**.

The AEP will work closely with the **Children Missing Education (CME) Team** and **Education Welfare Officer (EWO)** in all cases and will not remove the child from the register until this has been agreed with the LA.

Reporting to the LA:

If a pupil is to be removed from the register, the AEP will provide the LA with the following information:

- The **full name** of the pupil.
- The **full name and address** of any parent/ carer with whom the pupil lives.
- At least **one telephone number** of the parent/ carer with whom the pupil lives.
- The **full name and address** of the parent/ carer with whom the pupil will live, if applicable, and the **date** the pupil will start living there.
- The **name of the pupil's new AEP** and the expected **start date**, if applicable.
- The grounds for removal from the register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006.

Collaboration with the LA:

The AEP will work with the LA to establish procedures for **returning pupils** to the admissions register. The AEP will also notify the LA if they have been unable to obtain required information, such as the pupil's address or contact details, and will highlight any **contextual information**, including **safeguarding concerns**.

Child Abduction and Community Safety Incidents:

Definition: Child abduction is the **unauthorised removal** or **retention** of a child from a parent or anyone with **legal responsibility** for the child. This can be perpetrated by:

- Parents or other **relatives**.
- People **known** to the victim.
- **Strangers**.

Community Safety:

- All staff should be alert to **community safety incidents** near the AEP that may raise concerns about child abduction, such as:
    - **Loitering** individuals.
    - **Unknown adults** talking to pupils.

Pupil Safety Education:

- Pupils will receive **practical advice** and lessons to help them stay safe **outdoors**.

Child Criminal Exploitation (CCE):

Definition: CCE is a form of abuse where an individual or group takes advantage of an **imbalance of power** to **coerce, manipulate,** or **deceive** a child into engaging in criminal activity for:

- **Something the victim needs or wants**.
- The **financial advantage** or **other advantage** of the perpetrator.
- Through **violence** or the **threat of violence**.

Specific Forms of CCE:

- **Transporting drugs or money** through **county lines**.
- **Working in cannabis factories**.
- **Shoplifting** or **pickpocketing**.
- **Committing vehicle crime**.
- **Committing or threatening violence** against others.

Victim Recognition:

- Pupils involved in CCE are considered **victims**, regardless of their criminal involvement, and even if the activity seems **consensual**.
- **All genders** are at risk of CCE.

Indicators of CCE:

- **Unexplained gifts, money, or possessions**.
- Associating with **other children** involved in exploitation.
- Changes in **emotional wellbeing**.
- **Misuse of drugs** or alcohol.
- **Going missing** for periods or returning home late.
- **Regularly missing AEP** or not engaging in education.

County Lines:

Definition: County lines refers to **gangs and organised criminal networks** exploiting children to **move, store, or sell drugs and money** across local areas or regions of the UK.

Specific Indicators of County Lines Involvement:

- **Going missing** and being found in areas away from home.
- Being a **victim** or **perpetrator** of serious violence, e.g., knife crime.
- **Receiving drug requests** via a phone line.
- **Transporting drugs**.
- **Handling money** for drugs.
- Being exposed to **'plugging' techniques**, where drugs are concealed internally.
- Found in **unconnected accommodation** or hotel rooms with drug activity.
- **Owing a debt bond** to exploiters.
- Having their **bank account used** to facilitate drug dealing.

Staff should be aware of pupils with **missing episodes** who may have been **trafficked** for transporting drugs. Concerns about county lines activity must be reported to the **DSL** immediately. The DSL may refer cases to the **National Referral Mechanism** and consider involving local services that support victims of county lines exploitation.

Cyber-Crime:

Definition: Cyber-crime involves **criminal activity** committed using **computers and/or the internet**. Crimes can be:

- **Cyber-enabled**: Crimes that happen offline but are facilitated online (e.g., fraud).
- **Cyber-dependent**: Crimes that require a computer (e.g., hacking).

Types of Cyber-Crime:

- **Hacking** (unauthorised access to computers).
- **Denial of Service (DoS) attacks**, also known as booting.
- **Malware** production or distribution (e.g., viruses, spyware, ransomware).

Staff will be aware of the **signs of cyber-crime** and follow appropriate procedures. The DSL may refer pupils involved in cyber-crime to the **National Crime Agency's Cyber Choices programme**.

Child Sexual Exploitation (CSE):

Definition: CSE is a form of sexual abuse where an individual or group exploits an **imbalance of power** to coerce a child into sexual activity for:

- **Something the victim needs** or wants.
- The **financial or status gain** of the perpetrator or facilitator.
- Through **violence** or threats.

CSE can occur over time or as a **one-off** event. It can happen without the victim's knowledge, e.g., through **sharing of images** or videos. Pupils aged **16 and above** can still be victims of CSE, even if they can legally consent to sexual activity. Victims may believe they are in a **genuine romantic relationship** and not realise they are being exploited.

Key Indicators of CSE:

- **Unexplained gifts**, money, or possessions.
- Associating with **other children involved** in exploitation.
- **Changes in emotional wellbeing**.
- **Drug or alcohol misuse**.
- **Going missing** or coming home late regularly.
- Having **older partners**.
- **Sexually transmitted infections**.
- Displaying **sexual behaviours** beyond expected development.
- **Pregnancy**.

Modern Slavery:

CST Alternative Education Provision is committed to preventing modern slavery and human trafficking in all aspects of our operations. We uphold ethical standards in our employment practices, supply chains, and partnerships, ensuring that all individuals are treated with dignity and respect.

Our Commitment

- We have a zero-tolerance approach to modern slavery and human trafficking.
- All employees, contractors, and suppliers are required to comply with UK Modern Slavery Act 2015.
- We conduct due diligence to assess and mitigate risks within our supply chains and recruitment processes.

Policies & Procedures

- Recruitment & Employment: We ensure fair hiring practices, verify worker eligibility, and prevent exploitation.
- Safeguarding & Whistleblowing: We provide clear reporting channels for staff and learners to raise concerns about unethical practices.
- Supplier Standards: We only work with organisations that align with our values and adhere to ethical labour practices.

Training & Awareness

We provide regular training to staff on recognising and reporting signs of modern slavery, ensuring vigilance in all areas of our work.

Definition: Modern slavery encompasses **human trafficking**, **slavery**, **servitude**, and **forced or compulsory labour**. It includes forms of exploitation such as **Child Criminal Exploitation (CCE)** and **Child Sexual Exploitation (CSE)**.

Signs of Modern Slavery:

Staff should be aware of indicators that a pupil may be a victim of modern slavery. These could include:

- Signs of **physical abuse**, **neglect**, or **emotional distress**.
- Pupils **working long hours** outside of AEP or **engaged in illicit activities**.
- **Isolation** from friends or peers, **frequent absences**, or **changes in behaviour**.

Staff will also be aware of the **support available** to victims of modern slavery and how to refer them to the **National Referral Mechanism**.

Female Genital Mutilation (FGM):

Definition: FGM involves procedures that **intentionally alter or injure** the female genital organs for **non-medical reasons**. FGM is **illegal** in the UK and typically takes place between birth and **15 years old**, with the majority of cases happening between ages **5 and 8**.

Risk Factors for FGM:

- **Low integration** into UK society.
- A **mother** or **sister** who has undergone FGM.
- Girls **withdrawn from PSHE**.
- Visits from a **female elder** from the country of origin.
- Being **taken on a long holiday** to a country of origin.
- Discussions about a **'special' procedure** to become a woman.

Symptoms of FGM:

- Difficulty **walking, sitting, or standing**.
- Spending longer than usual in the **bathroom or toilet** due to **urination difficulties**.
- Frequent **urinary, menstrual, or stomach problems**.
- **Prolonged absences** from AEP with noticeable **behaviour changes** upon return (e.g., withdrawal or depression).
- **Reluctance to undergo medical examinations**.
- Confiding in a professional about **pain or discomfort** between the legs without being explicit.

Mandatory Reporting of FGM:

Under the **Serious Crime Act 2015**, teachers have a **mandatory duty** to report directly to the **police** if they discover that FGM has been carried out on a girl under the age of 18. This often occurs through **disclosure** from the pupil. Teachers must:

- **Personally report** cases of FGM to the police.
- **Discuss** the case with the DSL and Children's Social Care.

The duty does not apply to **at-risk** or **suspected** cases, but these must still be reported to **Children's Social Care**.

For more information, refer to the Multi-Agency Statutory Guidance on FGM.

Safeguarding Policy Statement: Female Genital Mutilation (FGM)

Children's Sensory Therapy Ltd and CST Alternative Provision are fully committed to safeguarding and promoting the welfare of all children. We recognise that Female Genital Mutilation (FGM) is a form of child abuse and violence against women and girls, and we will take all reasonable steps to prevent and respond to any concerns relating to FGM.

Definition

FGM involves the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons. It is illegal in the UK and a criminal offence under the Female Genital Mutilation Act 2003.

Our Duty of Care and Legal Responsibilities

We are aware of our legal obligations under the mandatory reporting duty introduced by the Serious Crime Act 2015:

- Where a regulated professional (e.g. Occupational Therapist, teacher, clinician) has reason to believe that FGM has been carried out on a girl under 18, they have a legal duty to report this directly to the police via 101, within 24 hours.

- Where a child is thought to be at risk of FGM, this must be treated as a safeguarding concern and reported to Children's Social Care immediately via the Designated Safeguarding Lead (DSL).

1. Training and Awareness

- All staff receive regular safeguarding training, including specific awareness of FGM: signs, risk indicators, and the reporting duty.

- DSLs undertake enhanced training and maintain up-to-date knowledge of local and national protocols.

2. Recognising Risk and Responding

- Concerns may arise from direct disclosure, physical symptoms, or cultural/contextual factors (e.g. planned travel to high-prevalence countries).

- If a child discloses that FGM has occurred, staff must notify the DSL and **personally report the concern to the police** (if they are a regulated professional).

- If a child is believed to be at risk of FGM, the DSL will make a referral to **Children's Social Care** in line with the local safeguarding partnership procedures.

3. Recording and Confidentiality

- All concerns are recorded clearly, accurately, and securely.

- Information is shared appropriately and only with relevant safeguarding authorities.

- Where there is immediate risk, **parents may not be informed** if doing so would increase the risk to the child.

4. Prevention and Education

- Staff take care to build open, trusting relationships with families and children, creating safe spaces for disclosure.

- Through our trauma-informed and culturally sensitive practice, we aim to raise awareness and support vulnerable children and families wherever appropriate.

Honour-Based Abuse (HBA):

FGM is considered a form of **Honour-Based Abuse (HBA)**, which involves crimes committed to **defend the honour** of a family or community. All forms of HBA are considered **abuse** and will be treated and escalated accordingly.

Staff will be alert to signs of **HBA**, including:

- Concerns that a pupil is at risk of **HBA** or has already suffered from it.
- Consulting the **DSL** to activate **local safeguarding procedures** when concerns arise.

Staff will be vigilant in recognising **cultural factors** that may contribute to these forms of abuse while ensuring that all students are treated equally and with respect.

Forced Marriage:

Definition: Forced marriage is a **crime** and a form of **abuse** where one or both spouses are **coerced** into marriage against their will. The coercion can be **physical**, **psychological**, **financial**, **sexual**, or **emotional**. Under the **Anti-social Behaviour, Crime and Policing Act 2014**, it is an offence to use any form of coercion to force someone into marriage, or to cause a child under the age of 18 to marry.

Indicators of Forced Marriage:

- **Persistent absence** from AEP.
- **Extended leave** of absence and failure to return from a visit to their country of origin.
- **Fear** of upcoming AEP holidays.
- Being **monitored** by siblings or relatives at AEP.
- Declining **performance**, **engagement**, or **exam results**.
- Being **withdrawn** from AEP or day centres, particularly if the pupil has a **disability**.
- Not being allowed to attend **extracurricular activities**.
- Sudden **engagement** announcement to a stranger.
- **Family history** of forced marriage.
- **Mental health disorders**, e.g., depression, self-harm, anorexia.
- Sudden **decline in educational performance** or motivation.

Responding to Concerns:

- If any staff suspect a pupil is undergoing or at risk of forced marriage, they will **immediately** inform the **DSL** or **headteacher**.
- The **pupil** will be spoken to **privately**, and their **concerns** will be taken seriously.
- **Local safeguarding procedures** will be followed, which may include referrals to **Children's Social Care (C/ASC)**, the **police**, or the **Forced Marriage Unit**.
- **Staff will not approach** the pupil's family or community members without the pupil's consent, as this could **increase risk**.

Further Support for Victims:

- **Rights and choices** for legal advice and representation will be shared with the pupil.
- Injuries will be **documented**, and referrals for medical examination will be made as necessary.
- **Personal safety advice** will be provided, and a **safety plan** will be developed.
- Where possible, the AEP will determine if the pupil has **dual nationality** or **two passports**, which may present further risks.

AEP Environment and Curriculum:

- A **safe environment** will be created for pupils to discuss their concerns about forced marriage.

- Forced marriage will be **openly discussed** as part of the AEP's **RSHE curriculum**.
- Pupils will be educated on the **signs** of forced marriage and how to obtain **help**.
- Staff will undergo **CPD** training to understand the **issues surrounding forced marriage** and the **signs** to look for.

Mental Health Support:

- The AEP will be **vigilant** for signs of **mental health disorders** or **self-harm**.
- The **DSL** and **senior mental health lead** will work together to support victims of forced marriage.
- **Referrals** will be made to appropriate mental health services on a **case-by-case basis**.

In all cases, the AEP will follow **local and national safeguarding protocols** to ensure the safety and support of pupils at risk of, or suffering from, forced marriage.

Preventing Radicalisation

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

Definition of Extremism: Extremism refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and tolerance of different faiths and beliefs. It also includes calls for the death of members of the armed forces.

Definition of Terrorism: Terrorism refers to actions that endanger or cause serious violence to a person or people, damage property, or seriously disrupt electronic systems, with the intent of influencing the government or intimidating the public for political, religious, or ideological reasons.

The Prevent Duty

Under **Section 26 of the Counter-Terrorism and Security Act 2015**, all AEPs must have due regard to the need to prevent people from being drawn into terrorism, known as the **Prevent duty**. This duty forms part of the AEP's wider safeguarding obligations.

- AEPs must be proactive in assessing the risk of pupils being radicalised and drawn into extremism or terrorism.
- Staff must be alert to changes in behaviour that may signal a need for intervention.
- Staff should report concerns to the **DSL** or consider a **Prevent referral**.

The AEP's Role in Preventing Radicalisation

- The **DSL** will undergo **Prevent training** to provide advice and support to staff.
- The AEP will work with **local safeguarding arrangements** as appropriate.
- Staff will be trained to recognise signs of radicalisation and extremism.
- **Parents and families** will be engaged, as they are key in spotting signs of radicalisation.

Channel Programme

- The **Channel programme** is used for individuals at risk of radicalisation.
- AEPs are expected to understand the process for making **Channel referrals**.
- **Consent** is required for a Channel referral.

- The AEP will follow local protocols and refer to the **Nottingham City/ County Prevent Team** if concerns arise.

Mental Health and Radicalisation

- **Mental health problems** can sometimes be an indicator of pupils being at risk of radicalisation.
- Staff will not attempt to diagnose mental health problems but will refer concerns to appropriate professionals.

Support for Pupils with Family Members in Prison

Pupils who have a family member in prison will receive:

- **Pastoral support** as necessary.
- A copy of **'Are you a young person with a family member in prison?'** to help address their concerns.

Pupils Required to Give Evidence in Court

Pupils who need to give evidence in court, whether for crimes committed against them or as witnesses, will be provided with:

- **Pastoral support**.
- A copy of **'Going to Court and being a witness'** to help them understand the process.

Mental Health Concerns and Safeguarding

Staff will:

- Be made aware that mental health problems can be linked to abuse, neglect, or exploitation.
- Not attempt to diagnose mental health conditions but refer concerns to the **DSL** or mental health professionals.
- Be trained to recognise how a pupil's experiences can affect their mental health, behaviour, and education.

The AEP will work with **external agencies** to identify pupils needing additional mental health support.

For more information on the **Prevent Duty** and further guidance, you can visit the following link: Prevent Duty Guidance.

Serious Violence

All staff at **CST AEP** will be trained to recognise indicators that may suggest a pupil is at risk from, or involved in, serious violent crime. These indicators include:

- Increased **absence** from the AEP.
- A change in **friendships** or relationships with older individuals or groups.
- A **significant decline** in academic performance.
- Signs of **self-harm** or emotional distress.

- **Unexplained injuries** or signs of assault.
- **Unexplained gifts** or new possessions.

Risk factors increasing vulnerability to serious violence include:

- Being **male**.
- **Frequent absence** from AEP.
- **Permanent exclusion** from AEP.
- A history of **child maltreatment**.
- Prior involvement in **offending**, such as theft or robbery.

Staff who suspect that a pupil may be involved in serious violence must report their concerns immediately to the **DSL**.

Sexual Violence and Sexual Harassment in AEPs

All AEPs must respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including incidents that occur online or outside of AEP premises.

- **Sexual violence** refers to acts such as rape, assault by penetration, and sexual assault.
- **Sexual harassment** includes making inappropriate sexual comments, physical behaviour, or online harassment.

Key principles:

- Girls are more likely to be victims, and boys are more likely to perpetrate, but all victims must be taken seriously.
- Victims should never be made to feel that they are creating a problem or feel ashamed for reporting incidents.
- **Staff** must be trained to understand the complexities of these incidents and respond appropriately.

Support for perpetrators is essential to prevent future problematic, abusive, or violent behaviours. Addressing inappropriate behaviour early can be a crucial intervention.

Child-on-Child Abuse

Staff should be aware that safeguarding issues often manifest as **child-on-child abuse**, which may include:

- **Bullying** (including cyberbullying).
- **Physical abuse** such as hitting, kicking, or biting.
- **Sexual violence** and **sexual harassment**.
- **Upskirting**, **sexting**, and initiation-type violence.

CST AEP adheres to a **zero-tolerance approach** to child-on-child abuse, addressing incidents through both safeguarding and behaviour policies.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, leading to serious impairment of their health or development. **Neglect** includes:

- Failure to provide adequate food, clothing, and shelter.
- Failure to protect a child from harm.
- Failure to ensure appropriate medical care or treatment.

Neglect may also involve **emotional neglect**, such as not providing for a child's basic emotional needs.

All staff must be aware that **child sexual exploitation (CSE)** and **child criminal exploitation (CCE)** are also forms of child abuse.