



# **Safeguarding Policy**

## **Lets Make Change**

**Created: February 2025**  
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The policy reflects current legislation, accepted best practice and complies with the government guidance: [Working Together to Safeguard Children](#) 2023 and Keeping Children Safe in Education 2024.

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# 1. Introduction

At Lets Make Change Limited (LMC) we recognise it is our moral and statutory responsibility to safeguard and promote the welfare of all learners. We will endeavour to provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice. The procedures contained in this policy apply to all LMC Staff employed by LMC and are consistent with the Nottingham City Safeguarding Children Partnerships (NSCP).

## 2. Key Safeguarding Contacts

Role	Name	Contact Details
Director	Joseph Fitzpatrick	<a href="mailto:admin@letsmakechange.co.uk">admin@letsmakechange.co.uk</a>
Designated Safeguarding Lead (DSL)	Joseph Fitzpatrick	<a href="mailto:safeguarding@letsmakechange.co.uk">safeguarding@letsmakechange.co.uk</a>
Nottingham City Safeguarding Children Partnerships Procedures Manual	<u><a href="#">Welcome to the Interagency Safeguarding Children Procedures (proceduresonline.com)</a></u>	<a href="mailto:safeguarding.partnerships@nottinghamcity.gov.uk">safeguarding.partnerships@nottinghamcity.gov.uk</a>
Local Authority Designated Officer (LADO)	Caroline Hose	<a href="mailto:LADO@nottinghamcity.gov.uk">LADO@nottinghamcity.gov.uk</a>
Police – Report a Crime and immediate risk of harm to a child	101	In an emergency call 999

## 3. The aims of this policy are to:

- Confirm that the Learners' development is supported in ways that will foster security, confidence and independence
- Raise the awareness of LMC Staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- Confirm the structured procedures to be followed by all members of LMC Staff in cases of suspected harm or abuse
- Emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child safeguarding, mental health, attendance, health and safety and other safeguarding responsibilities
- Emphasise the importance of maintaining and implementing appropriate safeguarding policies, procedures
- Highlight the connection between the Safeguarding Policy and for safer recruitment of staff and volunteers, and for managing allegations
- Confirm the working relationship with City MASH, Nottingham City Safeguarding Partners, Nottinghamshire Safeguarding Children Partnership and other agencies and, where appropriate, with similar services in neighboring authorities.

### **Obligations of policy**

Schools (including independent schools, non-maintained special schools, academies and free schools) and Further Education (FE) institutions should give effect to their duty to safeguard and promote the welfare of their pupils under section 175/157 the Education Act 2002 and where appropriate under the Children Act 1989 by:

- Creating and maintaining a safe learning environment for children and young people; and,
- Identifying where there are child welfare concerns and taking action to address them, in partnership with other organisations where appropriate.

Although LMC is an Alternative Provision, they meet the Safeguarding Standards of any other Education provider.

Proprietors should ensure children are taught how to keep themselves and others safe, including online. Preventative education should be taught as part of a whole school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for discrimination, harassment and abuse of any kind. This will include a planned programme of evidence based RSHE that reflects the school's/Alternative Provision's values and is delivered regularly as well as reinforced throughout the whole curriculum. The programme will be age and stage appropriate and fully accessible to all.

## 4. Statutory duties that apply to Education providers

**Working Together to Safeguard Children 2023** [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92242/Working_together_to_safeguard_children_2023.pdf) & **Keeping Children Safe in Education 2024 (KCSIE 24)** [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92242/Working_together_to_safeguard_children_2023.pdf)

Education Providers should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, including:

- Ensuring that child protection is at the forefront of practice.
- Ensuring the importance of wishes and feelings of the child and hearing the child's voice.
- Ensuring that the School/Alternative Provision contributes to inter-agency working in line with statutory guidance *Working Together to Safeguard Children 2023*. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to, for example, children subject to child protection plans and children who are looked after;
- A clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children;
- A senior member of staff to take leadership responsibility for the safeguarding arrangements with support from a delegated designated safeguarding lead;
- A culture of listening to children and taking account of their wishes and feelings and ensuring there are systems in place for children to express their views and give feedback;
- Ensuring there are procedures in place to respond robustly to allegations, including those relating to children harming, or allegedly harming other children and allegations against staff and volunteers;
- Arrangements which set out clearly the processes for sharing information, with other professionals and with the Local Safeguarding Children Board (LSCB);
- A designated professional lead for safeguarding. Their role is to support LMC staff, to recognise the needs of children, including recognising and responding to possible abuse or neglect. Designated leads' roles should always be explicitly defined in job descriptions. They should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively;
- Safe recruitment practices for individuals whom the organisation will permit to work regularly with children
- Keeping Children Safe in Education 2024, including policies on when to obtain a relevant Disclosure and Barring Scheme (DBS) check;

- The School/Alternative Provision/college, must keep a single central record of DBS checks and training undertaken (Keeping Children Safe in Education 2024). The record must cover the following people:
- All Staff who work in a School, colleges or Alternative Provision - this means those providing education to children
- All others who work in regular contact with children in the School/Alternative Provision/college, including volunteers
- For independent School, including academies and free School, all members of the proprietary body.
- It is the school/college/Alternative Provision's responsibility to ensure that all the staff they employ in specified early or later years childcare have had the appropriate checks. This includes ensuring that staff working in early and later years settings are suitable to do so. The DfE issued updated guidance for School in 2018, entitled Disqualification Under the Childcare Act 2006 of teachers and other School staff working in early or later years provision, or those who are directly concerned with the management of such provision. A person is automatically disqualified if they live in the same household as another person who is disqualified or in a household where a disqualified person is employed. The categories of staff in nursery, primary or secondary School/Alternative Provision settings covered by regulation<sup>13</sup> include staff who:
  - Work in the early years provision (including teaching staff and support staff working in School nursery and reception classes)
  - Work in later years provision for children who have not reached the age of eight, including before-School settings such as breakfast clubs and after-School
  - Are directly concerned with the management of such early or later years provision.
  - Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;

Staff should be given a mandatory induction, which includes familiarisation with safeguarding responsibilities and procedures to be followed if anyone has any concerns

about a child's safety or welfare. Staff in School/Alternative Provisions and colleges should ensure that **All Staff read at least part one of Keeping Children Safe in Education 2024.**

- There should then be an ongoing programme of refresher training and updates to staff/volunteers about key safeguarding issues, e.g. information shared at the Designated Safeguarding Leads network meeting. Such updates should be at least annual.
- Ensure there is an effective child safeguarding policy in place together with a staff behaviour policy (code of conduct) and a whistleblowing policy. These should be provided to all LMC Staff - including temporary staff and volunteers - on induction;
- As Per KCSIE 2024 guidance states that School/college/Alternative Provision's must let potential candidates know that online searches will be done as part of due diligence checks ahead of their interview.
- All professionals should have regular reviews of their own practice to ensure they improve over time;
- The designated lead professional for safeguarding should maintain comprehensive records, which should be used to inform a review of the support and level of concern child's circumstances whenever new information arises.
- All School/college/Alternative Provisions must be compliant with the requirements of the LSCB in Nottingham and this includes engagement in the Serious Case Review process.
- The Nottingham City Safeguarding Children Board (NCSCB) requires all School/college/Alternative Provision's to complete an annual safeguarding audit and be engaged in multi-agency processes and Serious Case Reviews (See Working Together to Safeguard Children 2023)
- To be read in conjunction with DfE Keeping Children Safe in Education 2023.
- Clear policies in line with those from the LSCB for dealing with allegations against people who work with children, in either a paid or voluntary capacity. An allegation may relate to a person who works with children who 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; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

### **In addition:**

The Designated Officer (previously known as the Local Authority Designated Officer) is involved in managing and overseeing individual cases where allegations are made against people who work

with children. The Designated Officer will provide advice and guidance to the school/college/Alternative Provision liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, and are consistent with a thorough and fair process:

- Any allegation should be reported immediately to the Director of LMC. Where the allegation relates to the Director, the Designated Officer should be informed of all allegations that come to an employer's attention or that are made directly to the police; and
- if an organisation removes an individual (paid worker or unpaid volunteer) from work such as looking after children (or would have, had the person not left first) because of a concern that the person may pose a risk of harm to children, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.
- As Per KCSIE 2024, If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be recorded and dealt with by LMC Director, with advice taken from The Designated Officer.
- As Per KCSIE 2024 Designated safeguarding leads (DSL) are responsible for understanding the filtering and monitoring systems each School/Alternative Provision has in place. This means that DSLs need to take the time to understand the kinds of websites students are visiting, for example. LMC learners use public library computers with a built in filtering system.

## **5. Roles and Responsibilities**

**The Director** will ensure that:

The policies and procedures are followed by All LMC Staff

- The policy will be updated annually and be available publicly either via the alternative provision website or by other means.
- Designated staff review our policies when the NCSP update their policies and procedures
- Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of children and young people and be appropriately trained.
- A single central database of all LMC staff and volunteers, and their safeguarding training dates is maintained by the HR Manager and that this list confirms that All LMC Staff and those volunteers who meet the specified criteria have had a DBS check, when this check was made and when it will be renewed.



- All LMC staff and volunteers feel able to raise their concerns about poor and unsafe practice in regard of learners, and such concerns are addressed in a timely manner in accordance with agreed policies.
- All LMC staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children missing from education, particularly where there are concerns regarding the potential for forced marriage or female genital mutilation.
- LMC recognises that all LMC staff should also be aware that mental health (problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation). Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. All LMC Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the policy and speaking to the designated safeguarding lead/Mental Health lead.
- Safeguarding Responsibly at LMC is retained, however delegate the Roles and Responsibilities of a Designated Safeguarding Lead as outlined in Keeping Children Safe in Education 2024 to the Designated Safeguarding Lead.
- If there are concerns about a member of staff's suitability to work with children, the Designated Officer (LADO) is contacted.
- As per KCSIE 2024, LADO will also be informed if a safeguarding allegation is made by a learner/member of staff against an external individual or organisation.
- Support is provided to staff who attend strategy meetings, looked after reviews and/or case conferences
- Support is provided to the DSL/D-DSLs to fulfil their roles and responsibilities, ensuring they have additional time, funding, training and resources to carry out the role.

**Named Mental Health Leads: Harriet Coulby.** Who will undergo child mental health training, and which will be updated regularly in line with advice from the NCSCB.

**Named Designated Safeguarding Lead, Joseph Fitzpatrick will:**

- Complete the Roles and Responsibilities of a Designated Safeguarding Lead as outlined in Keeping Children Safe in Education 2024 and as defined in their Job description

- Undergo updated child safeguarding training every two years as a minimum including attending annual DSL updates/training from Nottingham City/County Council and DSL forums.
  - Keep written records of concerns, even if there is no immediate need for referral.
  - Ensure records include:
    - A clear and comprehensive summary of the concern
    - Details of how the concern was followed up and resolved
    - A note of any action taken, decisions reached and the outcome
  - Ensure all Safeguarding incidents are shared with the director and follow up action taken.
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- Ensure all child protection records are stored electronically on CPOMS and if shared electronically, must always be password protected.
  - Be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.
  - Liaise with relevant agencies in accordance with the NCSP (or other local authority) procedures when referring a learner where there are concerns about possible abuse or harm.
  - Ensure All LMC Staff, including supply staff, visiting professionals working with learners in LMC and volunteers are informed of the names and contact details of the designated leads and LMC's procedures for safeguarding children.
  - Be able to access the NCSP and Personnel procedures and make them accessible to All LMC Staff.
  - Support staff and volunteers who may find safeguarding issues upsetting or stressful by enabling them to talk through their anxieties and to seek further support from LMC's leadership group or others as appropriate
  - Support staff to reflect on the information they hold about children and provide an alternative perspective on issues in order to promote a better understanding of what may or may not be concerning
  - Be aware of the requirement for children (investigated by the police) to have an appropriate adult (PACE)
  - Will ensure that Children missing education - statutory guidance for local authorities 2016 is adhered to.
  - Will ensure that where a learner is subject to a **Child Protection Plan**, and is absent without explanation for two days, their key worker in Children's Social Care is contacted.

- Will ensure that where a learner has a **Child Protection Plan** or there are ongoing child protection enquiries, and the learner is no longer tutored by LMC; DSL is informed immediately by the learning manager.
- Their child protection file is downloaded for any new School/Alternative Provision or college as soon as possible but transferred password protected, including a copy for the learner's commissioner.
- Records are monitored for patterns of what, when taking in isolation would appear to be low level concerns, but when viewed together indicate a pattern which requires further action.
- Where there are existing Safeguarding concerns about a learner, and they transfer to another school/Alternative Provision, this information is to be shared electronically with the new provision as Per KCSIE 2024 within 5 working days or returned to the Commissioner.
- As a minimum, ensure that the receiving setting has access to a vulnerable child's EHC plan, child in need plan, child protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH is). This will ideally happen before a child arrives and, where that is not possible, as soon as reasonably practicable. If it is not possible for this exchange of information to occur between DSLs the identified senior leaders will take responsibility for this.
- Ensure involvement of other designated leads e.g. where there are concerns about a Learner who is 'looked after'
- Work with LMC staff to promote the educational outcomes for children who have or have had a social worker reach their potential
- Carry out a Safeguarding Induction with all new LMC Staff.

## **Learning Managers/Deputy designated safeguarding leads (D-DSL)**

Any deputy DSLs should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the director at LMC. D-DSL support the DSL/director to carry out Safeguarding Responsibilities and ensure they attend Safeguarding Training with Local Authority a minimum of every 2 years.

Alternative Provisions should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools/colleges/Alternative Provisions should allow access for children's social care from the host

local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. NSPCC guidance: 'When to call the police' is designed to help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

## **LMC staff**

All LMC staff, tutors and non-tutors, volunteers and anyone else working at LMC need to:

- Read Part 1 of Keeping Children Safe in Education 2024
- Complete all required Safeguarding Training on SSS training Platform annually.
- Be aware that to safeguard children, they have a duty to share information with the designated leads, and through the designated lead, with other agencies
- Be aware that despite the requirement to share information with designated leads they can make their own referral to Children's Social Care, e.g. in urgent situations.
- Be alert to signs and symptoms of harm and abuse. Further information regarding potential indicators of abuse, including specific information about risks such as Female Genital Mutilation and Forced Marriage is available on the NCSCB webpage
- Know how to respond to their duty when they have concerns or when a learner discloses to them and to act
- Know how to record concerns and what additional information may be required
- Undergo child safeguarding training which is updated regularly in line with advice from the NCSCB
- Recognise that abuse and neglect can happen in any setting and maintain an attitude of 'it could happen here'
- Familiarise themselves with "What to do if you're worried that a child is being abused: advice for practitioners' guidance." (2015)
- LMC Staff are responsible for informing LMC of any changes in circumstances that may impact on their current DBS certificate or ability to work with children. Although it is not mandatory, all LMC Staff are encouraged to sign up for the rolling DBS update service [DBS Update Service - GOV.UK \(www.gov.uk\)](https://www.gov.uk/dbupdate)

This policy reflects current legislation, accepted best practice and complies with government guidance: Working Together to Safeguard Children 2023 and Keeping Children Safe in Education September 2024.

## **Supporting Learners**

- The staff recognise that a child or young person who is abused or witnesses' violence may find it difficult to develop and maintain a sense of self-worth. We recognise that in these circumstances learners might feel helpless and humiliated, and that they might feel self-blame.
- We recognise that this alternative provision might provide the only stability in the lives of learners who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a learner in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn.
- LMC will support all learners by: discussing child protection cases with due regard to safeguarding the learner and his or her family; supporting individuals who are, or are thought to be, in need or at risk in line with NCSCB procedures; encouraging self-esteem and self-assertiveness; challenging and not condoning aggression, bullying or discriminatory behaviour; promoting a caring, safe and positive environment.
- We recognise that the provision of the right help at the right time is a key element of our wider safeguarding responsibilities. This includes providing Early Help directly through LMC or by signposting to other local services, as set out in Nottingham City's Family Support Strategy/Nottinghamshire County Council Early Help Unit. Where a child is receiving early help support, we will continue to monitor this to make sure it is having the required impact. Where there is no evidence of this impact, we will consider other alternatives, which may include seeking specialist support.

Risk factors that might increase the likelihood of involvement in serious violence have been added. Risk factors include:

- Having been frequently absent or permanently excluded from School/Alternative Provision
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

This policy reflects current legislation, accepted best practice and complies with government guidance: Working Together to Safeguard Children 2023 and Keeping Children Safe in Education September 2024.

Per KCSIE 2024. We maintain a culture of zero tolerance for sexism, misogyny/misandry, homophobia, bi-phobic and sexual violence/harassment. We have a clear set of values

and standards, upheld and demonstrated throughout all aspects of learning life. These are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme

is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program will tackle, at an age-appropriate stage, issues such as:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to - sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called 'honor'-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Per KCSIE 2024, the understanding that Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

This policy reflects current legislation, accepted best practice and complies with government guidance: Working Together to Safeguard Children 2023 and Keeping Children Safe in Education September 2024.

## **Confidentiality**

- The personal information about all learners' families is regarded by those who work in LMC as confidential. All LMC Staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality.
- Staff understand that they need know only enough to prepare them to act with sensitivity to a learner and to refer concerns appropriately. The designated leads and Director will disclose information about a learner to other members of staff on a need-to-know basis only. It is inappropriate to provide all LMC Staff with detailed information about the learner, incidents, the family and the consequent actions.

#### **Staff must be aware that:**

- They cannot promise a learner complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the learner or other learners safe
- Where there are concerns about a learner's welfare relevant agencies need to be involved at an early stage. If a member of staff or a volunteer has concerns about a learner's welfare, or if a learner discloses that s/he is suffering abuse or reveals information that gives grounds for concern, the member of staff must speak to their designated lead with a view to passing on the information.
- Staff must also be mindful of the Confidentiality of other LMC Staff and ensure that they do not share Confidential information relating to another Staff member with either a Learner or their family. All LMC Staff have a right to privacy.

#### **Working with parents/carers**

- Parents and carers play an important role in protecting their children from harm.
- In most cases, LMC will discuss concerns about a learner with the family and, where appropriate, seek their agreement to making referrals to Children and Families Direct.
- Where there are any doubts, the designated lead should clarify with Children and Families Direct whether, and if so when and by whom, the parents should be told about the referral. Alternatively, they could ring the Consultation Line in Children's Duty to discuss this case. The number for this is 01159 774247
- The learner's views/safety will be considered in deciding whether to inform the family, particularly where the learner is sufficiently mature to make informed judgments about the issues, and about consenting to that.

This policy reflects current legislation, accepted best practice and complies with government guidance: Working Together to Safeguard Children 2023 and Keeping Children Safe in Education September 2024.

#### **Working with parents/carers**

*“Children want to be respected, their views to be heard, to have stable relationships with professionals built on trust and for consistent support provided for their individual needs. This should guide the behaviour of professionals. Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; and work with them collaboratively when deciding how to support their needs.”* Working Together to Safeguard Children 2023

LMC aims to help parents understand that this alternative provision, like all others, has a duty to safeguard and promote the welfare of all learners. LMC may need to share information and work in partnership with other agencies when there are concerns about a learner's welfare.

## Prevention in the Curriculum

- LMC recognises the importance of developing learners' awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The PSHE programme *in each key stage* provides personal development opportunities for learners to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, learners are taught to, for example:
  - Safely explore their own and others' attitudes
  - Recognise and manage risks in different situations and how to behave responsibly
  - Judge what kind of physical contact is acceptable and unacceptable
  - Recognise when pressure from others (including people they know) threatens their:
    - Personal safety and well-being and develop effective ways of resisting pressure;
    - Including knowing when and where to get help
  - Use assertiveness techniques to resist unhelpful pressure.
  - How to keep safe on-line
- The risks associated with sharing indecent images of, or information about, themselves. This is something that is often referred to as Sexting. Research indicates that this is increasingly associated with concerns such as sexual exploitation. Our work in this area is based on the guidance set out in Sexting in School/Alternative Provisions and Colleges: Responding to Incidents and Safeguarding Young People.



## 6. Reporting and Recording Safeguarding Concerns

Any concern should be discussed in the first instance with one of the designated leads or in their absence, the Director, as soon as possible. **If there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or the police immediately. Anybody can make such a referral.**

If staff think that a child is at risk of abuse, this can be reported directly to the MASH (Multi Agency Safeguarding Hub). If staff have urgent concerns or suspect a child has been abused in any way, Nottinghamshire County Council MASH can be called immediately on **0300 500 80 90** or Nottingham City MASH on **0115 876 4800**. In an emergency call 999.

### Immediate response to the learner

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

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

## Recording information

- Make some brief notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern, facts and not assumption or interpretation. Your name and role should be included.
- If it is observation of bruising or an injury try to record detail, e.g. “right arm above elbow”. Do not take photographs.
- Note the non-verbal behaviour and the key words in the language used by the learner (try not to translate into ‘proper terms’).
- It is important to keep these original notes and pass them on to the designated member of staff who may ask you to write a referral.
- Immediately or as soon as safe to do so, contact your Learning Manager/D-DSL or in their absence the Designated Safeguarding Lead. Record the details as soon as practicable on CPOMS.

## 7. Safe and Well-Being Checks

All LMC Staff are responsible for completing Safe and Well-Being checks on our Learners. If a Learner has not been seen by LMC Staff for more than 5 working days (Term Time only), then a Safe and Well-Being check must be completed by Staff. For this the Learner must be Physically seen by the LMC Staff member and their well-being checked (via conversation). In the instance that the Learner is unwell, and the parent/carers invites the LMC Staff member into the home to see the Learner, the member of staff must always remain with the parent/carers to carry out the safe and well-being check. If a Safe and Well-being check is unsuccessful LMC Staff are to seek advice from the DSL/D-DSL.

Tutors are to monitor their Learners' attendance and ensure Safe and Well-being checks are completed promptly. The DSL is to be informed if a Safe and well-being check has been unsuccessful and a learner has not been seen by staff every 5 working days during term time.

## 8. Supporting Looked After Children / Children in Care or Previously in Care

Supporting children in care/previously in Care is a key priority for our alternative provision. We recognise that the needs of this group of children can only be effectively met when all agencies work together. To ensure we have a coordinated approach to meeting the needs of children in care who attend our alternative provision the Director at LMC holds responsibility to ensure they are supported with a Multi-Agency approach. The relevant Learning Manager supports and monitors the learners progress, and any concerns are reported via CPOMS, ensuring the allocated Social worker, Virtual School/Alternative Provision lead, and Commissioner (Designated Teacher) are informed immediately of any concerns. Learning Managers are to provide the relevant Commissioner with the required information for the Personal Education Plan (PEP).

## 9. Particularly Vulnerable Groups

Some children and young people may be particularly vulnerable to abuse and harm. This includes for example privately fostered children, children with a disability, children with communication needs. Certain forms of behavior can also increase the vulnerability of a young person such as drug or alcohol misuse. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (NCSCB) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm.

## 10. Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse. It happens when a child or young person is coerced, manipulated or deceived into sexual activity in exchange for things that they may need or want like gifts, drugs, money, status and affection. Children and young people are often tricked into believing they're in a loving and consensual relationship so the sexual activity may appear consensual. This is called grooming and is a type of abuse. They may trust their abuser and not understand that they're being abused. CSE does not always involve physical contact and can also occur through technology.

Children and young people can be trafficked into or within the UK for sexual exploitation. They're moved around the country and abused by being forced to take part in sexual activities, often with more than one person. Young people in gangs can also be sexually exploited.

Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse or blackmail to control them.

Anybody can be a perpetrator of CSE, no matter their age, gender or race. The relationship could be framed or viewed as friendship, someone to look up to or romantic. Children and young people who are exploited may also be made to 'find' or coerce others to join groups.

It's important to recognise that although the age of consent is 16 years old, children and young people over 16 can be exploited. Child sexual exploitation is a very complex form of abuse. It can be difficult for parents and carers to understand and hard for the young person to acknowledge that they are being exploited.

## Types of Child Sexual Exploitation (CSE)

CSE can happen in person or online. An abuser will gain a child's trust or control them through violence or blackmail before moving onto sexually abusing them. This can happen in a short period of time.

When a child is sexually exploited online, they might be persuaded or forced to:

- Send or post sexually explicit images of themselves
- Film or stream sexual activities
- Have sexual conversations

Once an abuser has images, video or copies of conversations, they might use threats and blackmail to force a young person to take part in other sexual activity. They may also share the images and videos with others or circulate them online.

Gangs use sexual exploitation:

- To exert power and control
- For initiation
- To use sexual violence as a weapon.

Children or young people might be invited to parties or gatherings with others their own age or adults and given drugs and alcohol. They may be assaulted and sexually abused by one person or multiple perpetrators. Sexual assaults and abuse can be violent, humiliating and degrading. It's important to remember an intoxicated person cannot give consent to sexual activity.

### Who is at risk of Child Sexual Exploitation?

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse. Victims will be reassured, taken seriously and kept safe. The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter, or remain involved in, sexually exploitative situations but do so through coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face, and it can happen online. It can also occur between young people and peers in intimate relationships. Even if no reports of sexual violence and sexual harassment are being made, it does not mean it is not happening. In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.

## **11. What is Child Criminal Exploitation (CCE) / County Lines**

County lines is a form of Child criminal exploitation where urban gangs persuade, coerce or force children and young people to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse.

Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime

- County lines gangs are highly organised criminal networks that use sophisticated, frequently evolving techniques to groom young people and evade capture by the police.
- Perpetrators use children and young people to maximise profits and distance themselves from the criminal act of physically dealing drugs (National Crime agency, 2019). Young people do most of the work and take the most risk.
- Dedicated mobile phone lines or “deal lines” are used to help facilitate county lines drug deals. Phones are usually cheap, disposable and old-fashioned, because they are changed frequently to avoid detection by the police.
- Gangs use the phones to receive orders and contact young people to instruct them where to deliver drugs. This may be to a local dealer or drug user, or a dealer or drug user in another count

### **CCE Risks**

County lines is a cross-cutting issue that often overlaps with other forms of abuse and criminal exploitation. It can lead to serious physical and emotional harm to young people (Home Office, 2020a).

### **Criminalisation**

If adults who work with children don't understand that county lines are a form of abuse, they may see children involved in county lines activity as criminals rather than as victims of criminal exploitation (Children's Society, 2019). This can lead to children not getting the safeguarding support and protection they need.

### **Drugs**

Perpetrators may use drugs and alcohol to entice young people into the gang lifestyle. In some cases, gangs trick young people into incurring drug debts that they then must pay off through county lines activity. This is often referred to as 'debt bondage'.

## **CCE - Physical violence**

There is a strong link between county lines activity and:

- Serious violence such as knife and gun crime
- The use of substances such as acid as a weapon
- Homicide

Conflict between rival gangs that are in dispute over who controls an area can lead to serious injury or death for young people who get caught in the wrong place. The fear of serious physical violence as revenge for disrespecting, 'snitching' or 'grassing' is one of the things that prevents young people from leaving gangs or seeking help from the police and other agencies.

## **Sexual abuse and exploitation**

As well as being used to transport drugs, county lines gangs may sexually abuse and exploit children of any gender (National Crime Agency, 2019). Some children are forced to transport drugs in ways that are invasive and harmful to their bodies. Young people may be forced to swallow bags of drugs to transport them, which could potentially be life threatening.

## **Trafficking and missing children**

Young people can be trafficked to locations far away from where they live for long periods of time by a county lines gang. They may end up staying in unsuitable accommodation in an area that is unknown to them. This might include short-term holiday lets or budget hotel.

## **Cuckooing**

Cuckooing happens when a county lines gang takes over the home of a vulnerable adult by coercion or force and use it as a base to deal drugs from. The vulnerable adult may have issues with substance misuse or mental health problems, be elderly or disabled or be in debt to the gang. These factors can make it easier for the gang to exploit and control them.

Children can be forced or coerced to stay at cuckooed addresses for long periods of time to deal drugs.

## **CCE - Financial exploitation and abuse**

Gangs are known to launder money from drug sales through children's bank accounts, either by using an existing account or forcing or persuading the child to open a new one.

# **12. Contextual Safeguarding**

All LMC staff, but especially the designated safeguarding lead (or deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

### **Extra-familial risks**

Contextual Safeguarding helps focus on the fact that young people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

## **13. Child-on-child abuse**

Per KCSIE 2024, All LMC Staff recognise children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of School/Alternative Provision or college and online. All LMC Staff are clear about child-on-child abuse and their important role in preventing it and responding where they believe a child may be at risk from it.

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

It is essential that all LMC Staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Physical Abuse (including online threats)
- Abuse in intimate personal relationship between children
- Bullying (including Cyber Bullying)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+ (KCSIE 2024).



## **14.Preventing Radicalisation**

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counter-terrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all School/Alternative Provisions/alternative provisions to respond when they become concerned that a child is being, or is at risk of, becoming radicalised. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk, and that staff are appropriately trained to look out for signs of radicalisation. Also, School/Alternative Provisions will be monitored to ensure they are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology.

Statutory guidance has been published and is available here:

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

If you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the DSL at LMC or in their absence the Prevent Team directly

[prevent@nottinghamshire.pnn.police.uk](mailto:prevent@nottinghamshire.pnn.police.uk) who will then contact you to discuss whether a referral should be made. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

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

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

## **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-School/Alternative Provision to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Potential indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from School/Alternative Provision or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers/Education Staff) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In School/Alternative Provisions, this will usually come from a disclosure.

LMC Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and Children's Social Care.

## **16. Private Fostering**

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

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

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

## **16.Private Fostering**

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

LMC staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. On induction to LMC, we will take steps to verify the relationship of the adults to the child who is being registered.

## **17.Children who Self-harm**

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

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

## **18.Children with continence issues**

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

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

## 19. Professional development and Training

- All LMC staff who work with learners need to have appropriate child safeguarding training that equips them to recognise and respond to learner welfare concerns.
- All LMC Staff will receive appropriate safeguarding and child protection training (including online safety) at induction via SSS training platform. The training will be regularly updated. In addition, All LMC Staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

We are in regular contact with parents and carers -

our communications will be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems we use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will ask to access and be clear who, (if anyone) their child is going to be interacting with online (KCSIE 2024).

- We will ensure staff are given mandatory induction, which includes familiarisation with child safeguarding policy, part 1 of Keeping Children Safe in Education 2024, staff behaviour policy, the designated leads in LMC, their responsibilities and procedures to be followed.
- The training, including multi-agency training annually undertaken by staff to ensure their knowledge and skills are up to date includes:
  - *Safeguarding*
  - *Child Protection*
  - *Health and Safety*

A training register is kept indicating when staff have been trained and is maintained and monitored by the HR Manager.

### **Safeguarding Training**

Regular Safeguarding training and discussion within the alternative provision environment is important and should be led by the Designated Lead for safeguarding, Jenny Brennan.

- Designated Safeguarding Lead training: To be completed by the Director, DSL and all D-DSLs, refreshed as per statutory requirements via Local Authority.
- Child Protection and KCSiE (all staff) updated annually via SSS.
- Safer recruitment training completed and updated annually by management via SSS.
- · Whole LMC Safeguarding training: To be refreshed annually with updates as agreed with NCSCB.

## **19. Professional development and Training**

All LMC Staff should be open to new learning and keep up to date with changes made to national and local safeguarding policy, procedure and guidance including that provided by our safeguarding partners.

Safeguarding partners (the local authority; Integrated Care Boards (previously known as clinical commissioning group) for an area within the local authority; and the chief officer of police for an area any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

School/Alternative Provisions need to evaluate and demonstrate how well they fulfil their statutory responsibilities and exercise professional judgment in Keeping Children Safe as outlined in Keeping Children Safe in Education 2024.

## **20. School/Alternative Provisions and Partnerships**

School/Alternative Provisions invest time and other resources in partnership activity and this investment should be aimed at improving outcomes for learners. The Local Authority actively promotes the benefits to School/Alternative Provisions of partnerships and in this case to safeguard and improve the outcomes for potentially vulnerable learners. Examples of this are:

Lets Make Change is committed to providing a safe, supportive, and nurturing environment for all learners. Safeguarding and child protection are at the heart of our practice, and all staff, volunteers, and stakeholders share responsibility for promoting the welfare of children. Through robust policies, clear procedures, ongoing training, and strong partnerships with parents, carers, and external agencies, LMC ensures that children are protected from harm and empowered to thrive. This policy will be reviewed regularly to reflect best practice, legislative changes, and the evolving needs of our learners.

## 21.Further guidance

To support the work around child protection and safeguarding, links to statutory, national and local guidance are below:

- Child Sexual Exploitation [Child Sexual Exploitation & How to Keep Your Child Safe | NSPCC](#)
- Female Genital Mutilation (FGM) - [Female Genital Mutilation - Prevent & Protect | NSPCC](#)
- Children who may have been trafficked –
- <https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>
- Gang and Knife Crime [Understanding Knife Crime: Information and Resources | Crimestoppers \(crimestoppers-uk.org\)](#)
- Homophobic, Transphobic Bullying [Homophobic, biphobic and transphobic bullying: review - GOV.UK \(www.gov.uk\)](#)
- Guidance is also available on the NCSCB Website for Children with Looked After Status and Children Missing from Home and Care [Children who run away or go missing from home or care - GOV.UK \(www.gov.uk\)](#)
- Private fostering arrangements - [www.privatefostering.org.uk](http://www.privatefostering.org.uk)
- Sexting in School/Alternative Provisions and Colleges [Sharing nudes and semi-nudes | NSPCC](#)
- Further information and guidance around Disqualification by Association [Disqualification under the Childcare Act 2006 - GOV.UK \(www.gov.uk\)](#)
- Guidelines on supporting Continence issue in children
- <https://www.nice.org.uk/guidance/CG111/chapter/introduction>