

Safeguarding & Child Protection Policy

Adopted by Pushforward Education Group Ltd – for review by the Board of Directors and Governors
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Updated 20.01 2026

For review – Annually – Review targets annually
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Safeguarding & Child Protection Policy



Overview

Pushforward is a multi-faceted business that provides alternative education and operates a specialist independent school. The services offered by the company cater to young people aged five and older. Serving numerous local authorities across East Anglia. Pushforward collaborates with various local safeguarding boards, which are outlined in Appendix 5. This policy applies to the Secondary School only.

Aims

The Pushforward Safeguarding and Child Protection Policy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote young person's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

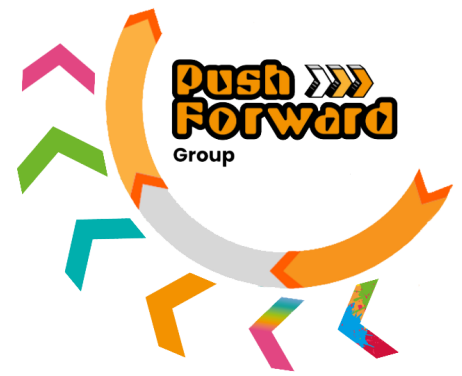
- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the [Female Genital Mutilation Act 2003](#), as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

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- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

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Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

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

Children includes everyone under the age of 18

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

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

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



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Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms.

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

Equality statement

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

We give special consideration to young people who:

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

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Roles and responsibilities

Safeguarding and young person protection is **everyone's** responsibility. This policy applies to all staff, volunteers at Pushforward and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to off-site activities.

Pushforward plays a crucial role in preventative education. This is in the context of a holistic approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system

All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe Education](#), and review this guidance at least annually. This will be done through our Flick training portal.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask young people to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this young person protection and safeguarding policy, the staff deputies, the behaviour policy, online safety policy the online safety that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to young people who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the Safeguarding Manager DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority Children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a young person tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

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- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as young person-on-young person abuse, grooming, young person sexual exploitation (CSE), young person criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that young people can be at risk of harm inside and outside of their home, at Pushforward and online
- The fact that young people who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other young people
- That a young person and their family may be experiencing multiple needs at the same time
- What to look for to identify young people who need help or protection

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

The Designated safeguarding Lead (DSL)

The Associate Director of Safeguarding has responsibility for online safety and understanding our filtering and monitoring processes on Pushforward devices and networks to keep pupils safe online.

The Safeguarding team is headed up by Associate Director of Safeguarding (DSL) , who have overall responsibility for safeguarding, in the absence there will be a (DDSL) Maddie (Head of School) who will take responsibility.

Safeguarding Team

Associate Director of Safeguarding – Daisy Upson DSL

Head of School – Maddie King (DDSL)

During term time, the Safeguarding Teams will be available during delivery hours for staff to discuss any safeguarding concerns.

The team can be contacted as below:

Daisy Upson DSL	Daisy@pushforward.uk
Maddie King DDSL	Maddie@pushforward.uk

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

- Provide advice and support to other staff on young person welfare and young person protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of young person
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place
- Leads on Prevent and lead on working with LA

The DSL will also:

- Keep the Directors informed of any issues through weekly meetings.
- Liaise with local authority case managers and designated officers for young person protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the settings policies
- Be confident that they know what local specialist support is available to support all young people involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that young people must have an 'appropriate adult' to support and help them in the case of a police investigation or search

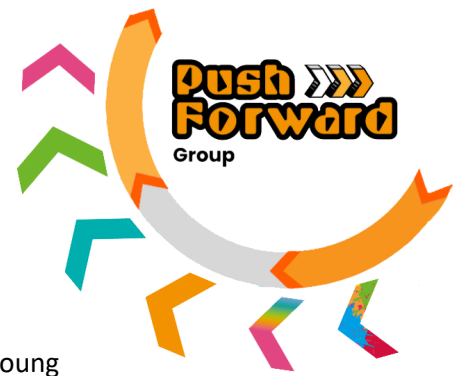
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The Board of Governors

The Board of Governors will:

- Facilitate a holistic approach to safeguarding, ensuring that safeguarding and young person protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law and hold the Headteacher accountable.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements.
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and young person protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the Pushforward has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers.
- Make sure:
 - The DSL's have the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within a holistic approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - Pushforward has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that young people with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether the young person who attend these services/activities are on the roll):



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- Seek assurance that the other body has appropriate safeguarding and young person protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with Pushforward about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Headteacher will act as the 'case manager' if an allegation of abuse is made against a member of staff including DSL. Where allegations are made against the Head Teacher. The Chair of governors will act as 'case manager' where appropriate (see appendix 3).

The Head Teacher

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

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their young person joins the Pushforward and via the website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover.
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, (see appendix 3)

Confidentiality

Pushforward staff are urged to share any concerns with the Safeguarding team, this can be carried out using the system of detailed below. Staff are required to share this information with the Safeguarding team before speaking to other staff and parents/guardians to seek advice on what to do.

When Information sharing the following apply:

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

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- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of young people and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a young person at risk
- Staff should never promise a young person that they will not tell anyone about a report of abuse, as this may not be in the young person's best interests
- If a victim asks the Pushforward not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other young people
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a young person is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority young Children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any young people involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for young people involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the Safeguarding team.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

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Recognising abuse and acting

All staff are expected to be able to identify and recognize all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a young person who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered young person
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from provision, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and Directors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean any member of the safeguarding team with DSL status.

If a young person is suffering or likely to suffer harm, or in immediate danger

If staff feel a young person is in immediate danger, they should contact the DSL immediately. Staff will be advised of the action to take. If necessary, they may be asked to place a call into the police or Social Care

Local Safeguarding partnership details can be found in appendix 5

If a young person makes a disclosure to you

If a young person discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions



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- Stay calm and do not show that you are shocked or upset
- Tell the young person they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the young person's own words. Stick to the facts, and do not put your own judgement on. Staff should record using **initial concern form** picking the option of Safeguarding concern.

Bear in mind that some young people may:

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

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a young person.

If you discover that FGM has taken place or a pupil is at risk of FGM

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

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

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

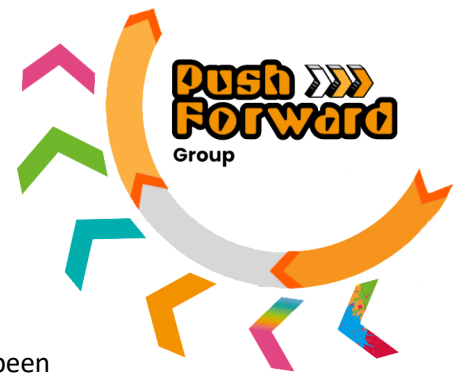
Any Staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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Any other member of staff who discovers that an act of FGM appears to have been carried out on a young person under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine young people. If you have concerns about a young person (as opposed to believing a young person is suffering or likely to suffer from harm, or is in immediate danger)

Staff who have concerns, about a young person's wellbeing, family or any other concern

Are required to:

- Complete Initial Concern form detailing sharing the information.
- This will be picked up by the welfare team who will assess the need and co-ordinate further pastoral care or other support such as early help.
- The DSL may decide to make a referral to local authority Children's social care directly, if appropriate

Reporting procedure can be found in Appendix 6

Early help assessment

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

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

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

Local Early help process can be found in Local Authority Section in Appendix 5

Referral

If it is appropriate to refer the case to local authority Children's social care or the police, (DSL) will make the referral.

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

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

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If you have concerns about extremism

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

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

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

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

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

If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a young person may be experiencing a mental health problem or be at risk of developing one.

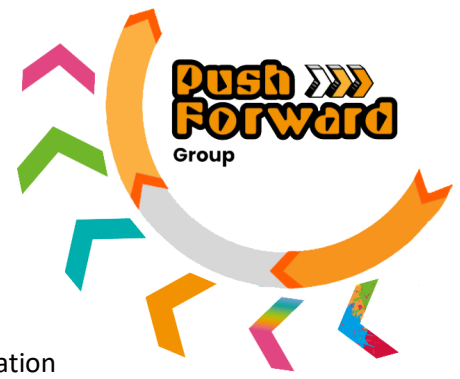
If you have a mental health concern about a young person that is also a safeguarding concern, take immediate action by following the steps in section 7.3.

Even if you have a mental health concern that is **not** also a safeguarding concern, staff should still follow procedure in 7.3

Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a volunteer or contractor), or an allegation is made about a member of staff (including a, volunteer or contractor) posing a risk of harm to young person, speak to the Head Teacher as soon as possible. If the concerns/allegations are about the Head Teacher, staff should speak to the Chair of Governors or LADO

They will then follow the procedures set out in appendix 3, if appropriate.



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

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

Allegations of abuse made against other pupils

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

We also recognise the gendered nature of child-on-child abuse. However, all child on child abuse is unacceptable and will be taken seriously.

Most cases of a young person hurting other will be dealt with under our behaviour policy, but this Child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the setting at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

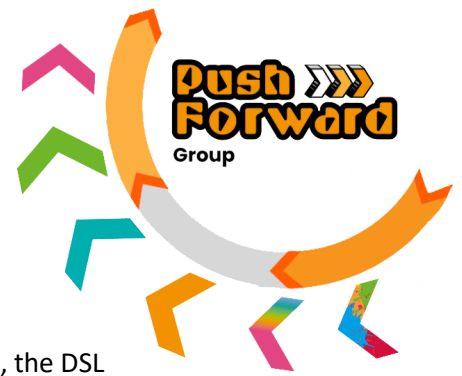
See appendix 4 for more information about young person-on-young person abuse.

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

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

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

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

Creating a supportive environment, minimising the risk of child-on-child abuse

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

To achieve this, we will:

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

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

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

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

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

Sharing of nudes and semi-nudes ('sexting')

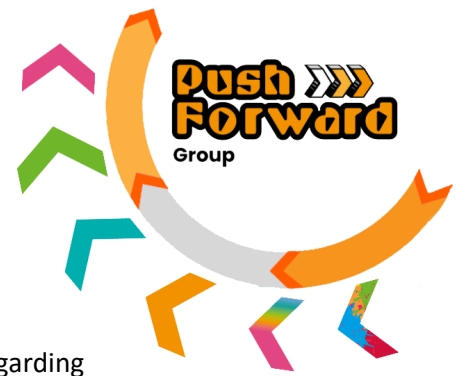
Your responsibilities when responding to an incident

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it

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- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, young people it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

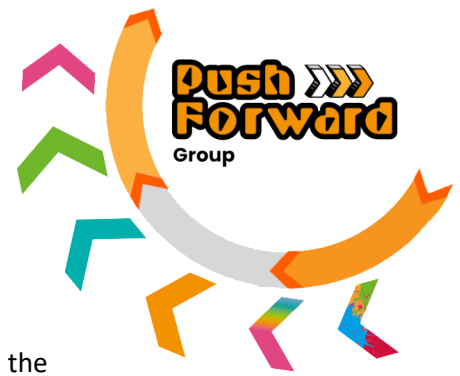
Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or young person's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

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

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- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through 101

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our wellbeing curriculum and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:



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- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with people so they are aware of the processes Pushforward will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the young person
- Promoting dialogue and understanding
- Empowering and enabling young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Reporting systems for our young people

We recognise the importance of ensuring young people feel safe and comfortable to come forward and report any concerns and/or allegations. The process of reporting forms part of the induction process for all students delivered both verbally and in suitable written formats.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils by promoting the safeguarding team and contact details throughout all locations and in the literature given to all pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Online safety and the use of mobile technology

We recognise the importance of safeguarding young person from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Our full online safety policy can be viewed on request

To address this, our Pushforward aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

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- Set clear guidelines for the use of mobile phones for Pushforward
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as young person or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet



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- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit young person's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Provide regular safeguarding and young person protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the young person protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our Pushforwards policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

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

Pushforward will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by Pushforward.

Notifying parents or carers

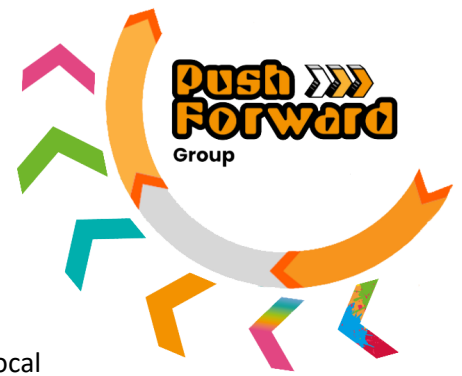
Where appropriate, we will discuss any concerns about a young person with the young person's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

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

If we believe that notifying the parents or carers would increase the risk to the young person, we will discuss this with the local authority young person's social care team before doing so.

In the case of allegations of abuse made against other young person, we will normally notify the parents or carers of all the young person involved. We will think carefully about what information we provide about the

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other young person involved, and when. We will work with the police and/or local authority young person's social care to make sure our approach to information sharing is consistent.

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

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

Young people with special educational needs, disabilities or health issues

All young person attending Pushforward, are considered to have SEND or mental health difficulties. We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Young person with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

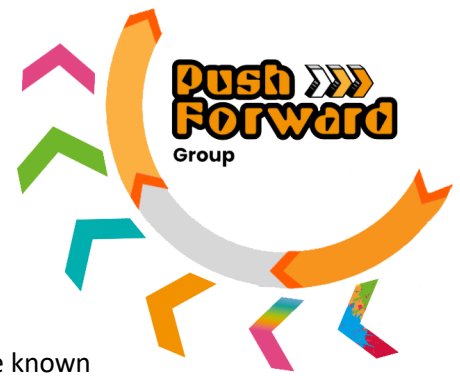
Young people with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable young person.

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

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

Looked-after and previously looked-after young person

We will ensure that staff have the skills, knowledge and understanding to keep looked-after young person and previously looked-after young person safe. In particular, we will ensure that:

- Appropriate staff have relevant information about young person's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of young person's social workers

13. Young people who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other young person.

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

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

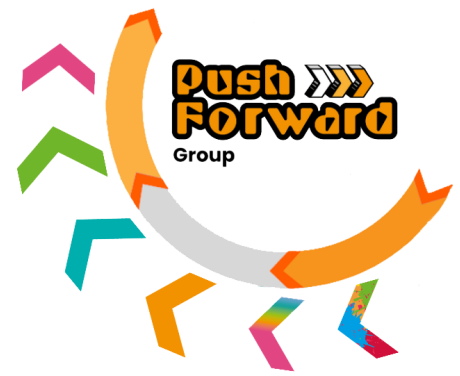
When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention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

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

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

Complaints and concerns about safeguarding policies

Complaints against staff



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

Other complaints

All other complaints will be dealt with in accordance with Pushforwards complaints procedure.

Whistleblowing

Pushforward takes poor practices or environment concerns seriously. All staff are assigned a whistle blowing jot form, where they can share their worries in confidence directly with the Directors. The whistle blowing policy outlines how to raise a concern.

Record-keeping

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

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

Records will include:

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

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

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

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

If a young person for whom Pushforward has, or has had, safeguarding concerns moves to another setting, the (DSL) will ensure that their young person protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the young person arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term



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

Safeguarding information will :

- All be recoded using ICF
- All submitted forms are stored with password protection
- All forms are stored in date order within a secure folder only accessible to Welfare Team

Pushforward shares information with other agencies when this is appropriate, in line with your local safeguarding procedures.

Training

All staff

All staff members will undertake safeguarding and young person protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of a holistic safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

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

Staff will also receive regular safeguarding and young person protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

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Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The Welfare Team

Members of the welfare team will undertake young person protection and safeguarding training at least every 2 years.

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

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

Recruitment – interview panels

At least 1 person conducting any interview for any post at Pushforward will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping children safe in Education, and will be in line with local safeguarding procedures.

Monitoring arrangements

This policy will be reviewed **annually** by Daisy Upson. At every review, it will be approved by the directors and governors.

Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff behaviour/code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality

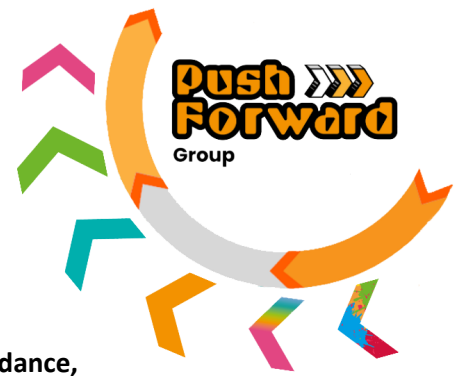
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- › Curriculum
- › Whistle Blowing

Policy Created	14/09/25
Review Date	14/09/25
Written by	Kay Hard
Agreed By	Leon Edwards

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These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education**.

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

- Conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on young person. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing young person frequently to feel frightened or in danger, or the exploitation or corruption of young person

Sexual abuse involves forcing or enticing a young person or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving young person in looking at, or in the production of, sexual images, watching sexual activities, encouraging young person to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet)

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

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

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

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

It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

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Appendix 2: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2024. Full details can be found in Safer Recruitment Policy.

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

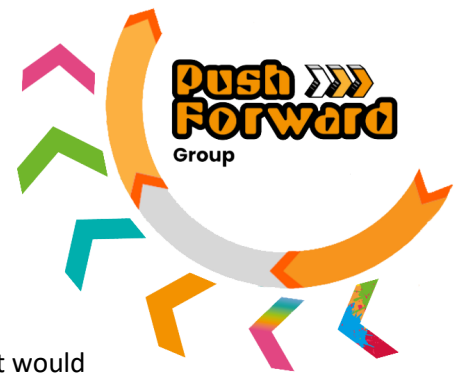
- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to young person (where the role involves this type of regulated activity)
- Include a copy of, or link to, our young person protection and safeguarding policy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

Shortlisting

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

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

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



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

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

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

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When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: criminal records checks for overseas applicants
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

Existing staff

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

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

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

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

Contractors

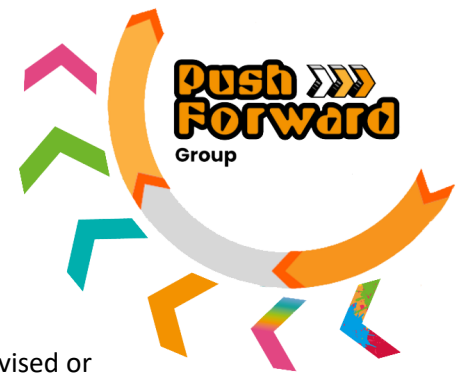
We will ensure that any contractor, or any employee of the contractor, who is to work at the Pushforward has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

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

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

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

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

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

Volunteers

We will:

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

Adults who supervise pupils on work experience

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

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

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Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

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

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

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

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

A 'case manager' will lead any investigation. This will be Head Teacher , or where it is against The Headteacher the Chair of governors will act. The case manager will be identified at the earliest opportunity.

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

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

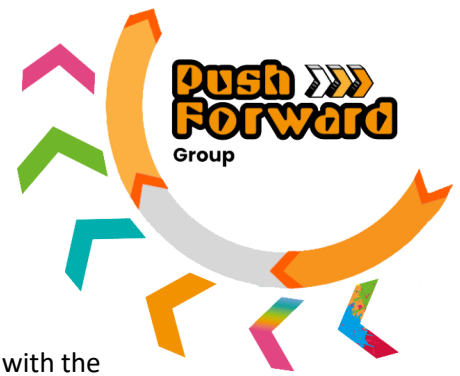
Suspension of the accused until the case is resolved

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

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

- Redeployment within the Pushforward so that the individual does not have direct contact with the young person or young people concerned
- Providing an assistant to be present when the individual has contact with young people
- Redeploying the individual to alternative work at Pushforward so that they do not have unsupervised access to young people

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- Moving the young person to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority young person's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

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

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

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arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate

- Where the case manager is concerned about the welfare of other young people in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at Pushforward their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action at Pushforward and/or liaise with the police and/or local authority young Children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the young person involved about the allegation as soon as possible if they do not already know (following agreement with local authority Children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the young person involved informed of the progress of the case (only in relation to their young person – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a young person

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

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

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Additional considerations for all contracted staff

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

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

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

Timescales

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

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

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

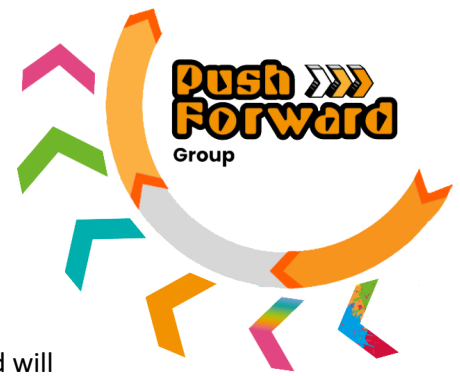
Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

The case manager will also consider how best to manage the individual's contact with the young person or young people who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

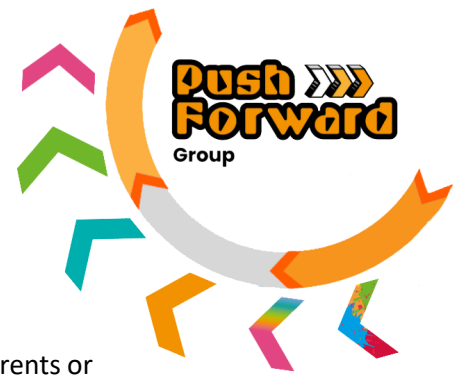
- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the young person and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority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

Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared



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- How to manage speculation, leaks and gossip, including how to make parents or carers of a young person/young people involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

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

In these cases, Pushforward will provide a copy to the individual, in agreement with local authority young Children's social care or the police as appropriate.

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff



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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Young Children Safe in Education.

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a young person, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority



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

- Being overly friendly with young person
- Having favourites
- Taking photographs of young person on their mobile phone
- Engaging with a young person on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

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

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

Record keeping

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

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Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves Pushforward

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

References

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

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

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Appendix 4: Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

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

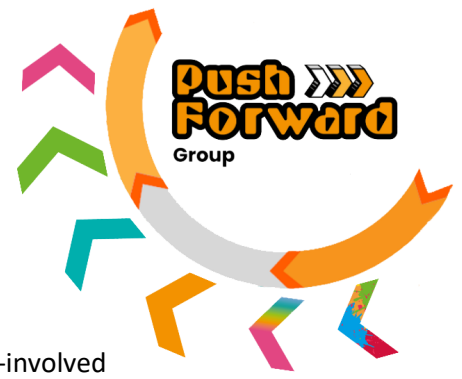
To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a young person or young person to encourage a response and build trust. The offender often grooms the young person or young person on social media, in chatrooms or on gaming platforms,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

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

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

- Contacted by an online account that they do not know but appears to be another young person or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the young person or young person initially sharing the image or the offender sharing a digitally manipulated image of the young person or young person to extort 'real' images

Financially motivated incidents



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

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

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

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

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

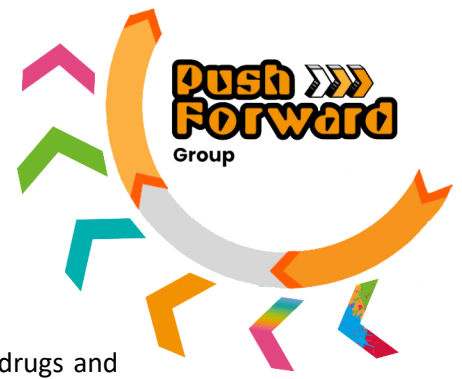
Potential signs of adult-involved financially motivated sexual extortion can include the young person or young person being:

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

County lines

Children of all ages and backgrounds are at risk of being exploited by criminal gangs who'll use them to transport drugs and money around the country. Understand what county lines is and the signs to look out for.

What is county lines?



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- A child is 'groomed' by a criminal gang, then exploited to transport drugs and money from one area (county) to another – usually from an urban location to a rural or coastal one. Grooming can happen in person, or online on social media apps like Snapchat
- The child may be trafficked to the gang's 'trap houses' or 'bandos' miles away from home, to find 'customers', deal with rival gangs and sell drugs
- The child is likely to face violence and sexual exploitation
- The 'lines' refer to the dedicated mobile phone lines that gangs use for selling drugs

- Criminal gangs are known to target:
 - Children with vulnerabilities, such as poverty, family breakdown, exclusion from school – because they're more likely to respond to manipulation and coercion
 - Children from stable or affluent families – because they're less likely to be known to the police and may blend in better in the town the gang sends them to
 - Girls and young children – children as young as 7 are being groomed by gangs, and girls are often groomed into relationships with gang members or used to transport drugs as they're less likely to be stopped by the police

However, any child is vulnerable to exploitation.

What signs should I look out for?

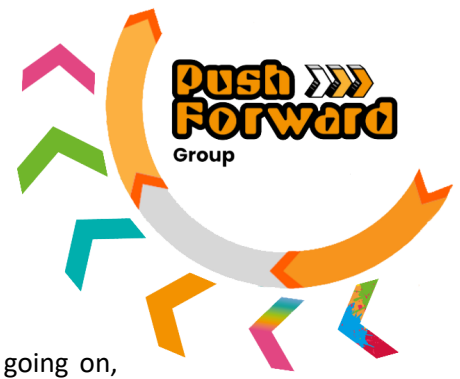
Potential signs that a child is involved in county lines include:

- Leaving home without explanation
- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Being secretive about who they're talking to and where they are going
- Persistently going missing from school or college
- Receiving unexplained money, phone(s), clothes or jewellery
- Receiving excessive texts/phone calls and/or owning multiple handsets
- Forming relationships with controlling/older individuals or groups
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Showing increasingly disruptive or aggressive behaviour
- Coming home with injuries or looking particularly messy
- Owning hotel cards or keys to unknown places
- Taking drugs, or being found with large amounts of drugs on them

Noticing any of these signs doesn't mean a child is being exploited through county lines. However, you should still talk to them about any concerns you have.

What should I do if I suspect a child is being exploited?

Speak to your DSL and report through the normal system.



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The DSL may, Talk to the child, stay calm and ask questions about what is going on, reassuring them you want to keep them safe. Try to be open, honest and non-judgemental – remember, they may be scared.

Young people who are absent from education

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

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

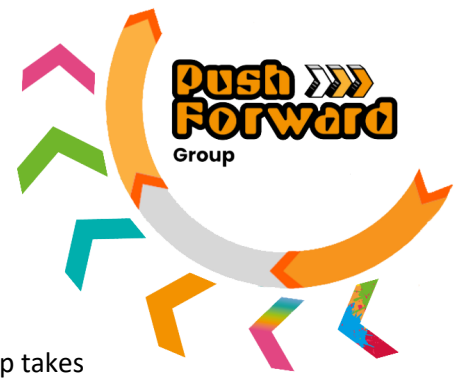
- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant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

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

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

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

Child criminal exploitation



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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a young person:

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

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

Child sexual exploitation

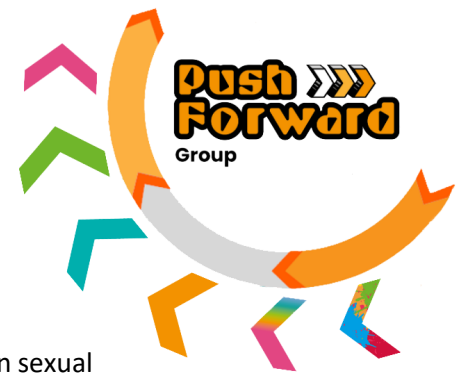
Child sexual exploitation (CSE) is a form of young person sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial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

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

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

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

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

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

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

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

Child-on-Child abuse

Child on Child abuse is when child abuses other child. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Pushforward has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Young person-on-young person abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between child (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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)

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- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between young people) and young person/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on young person of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

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

The DSL will provide support according to the young person's needs and update records about their circumstances.

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Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare.

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

Where a young person has been harmed or is at risk of harm, DSL will also make a referral to local authority Children's social care.

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

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

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

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a young person being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

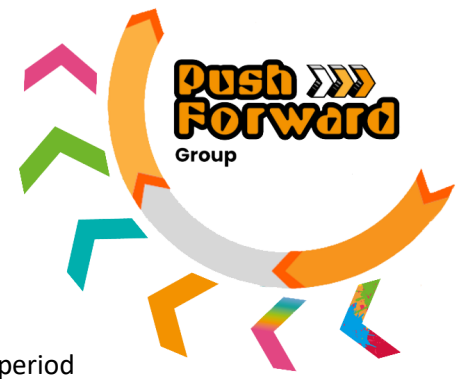
The DSL will make sure that staff have access to appropriate training to equip them to be alert to young people affected by FGM or at risk of FGM.

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE

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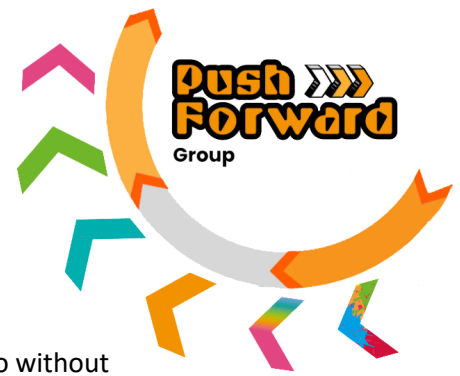
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

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

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

Forced marriage



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Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

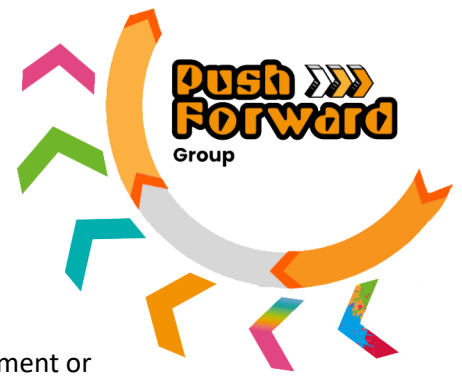
The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmua@fco.gov.uk
- Refer the pupil to an education welfare officer, counsellor, as appropriate

Preventing radicalisation

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

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The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at Pushforward and at home.

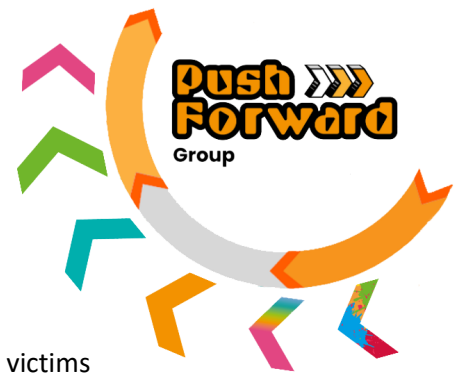
There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between young people

Sexual violence and sexual harassment can occur:

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

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

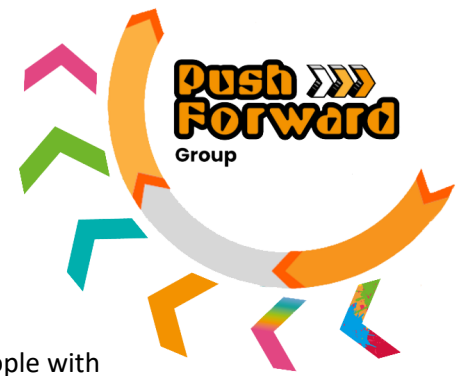
Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

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

Serious violence

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

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

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

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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Child abduction and community safety incidents

- What do we mean by child abduction and community safety incidents?
- Child abduction is when someone takes a child away from their parents, or those with legal responsibility for them, without the appropriate consent.
- The term 'community safety incidents' refers to people loitering near school or unknown adults engaging children in conversation. Incidents such as this around a school can raise concerns among children, parents and carers.

Who might do it?

- It can be committed by:
 - Parents (legally, in most cases, the child needs to be taken abroad for it to count as an abduction)
 - Other family members
 - People known, but not related to, the victim – like neighbours, friends and acquaintances
 - Strangers
- Previous research suggests most non-parental child abductions recorded by police are committed by strangers, or by people exploiting children.
- There are more 'attempted' abductions by strangers than there are 'successful' abductions – successful abductions are more likely to be by someone known to the child.

What can we do as education site?

- Always follow our pick-up procedures, to make sure children go home with the appropriate adult(s)
- Be alert to people loitering near the site and report anything suspicious

Children and the court system

Why is this potentially an issue?

- A child might be required to give evidence in criminal courts, either:
 - • As a victim

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- • As a witness

- They might also be affected by family court proceedings – for example, regarding child access arrangements following a separation.
- This could be stressful for a child, and there may be family conflict. Being a victim of, or a witness to, a crime can be a risk factor for potential mental health issues too.

- Family courts in England and Wales are often delayed, with reports of children waiting over a year to get a final decision on where they are to live. This uncertainty and lack of stability can create even more stress and anxiety for children.

What should I look out for?

- Be alert to signs that a child could be struggling with stress or their mental health. These include:
 - Behavioural problems, particularly where there weren't any before
 - Becoming more withdrawn
 - Seeming anxious, sad or down
 - Doing less well at school
 - Changes in their eating patterns
 - Seeming tired

What should I do if I have concerns?

- Tell our designated safeguarding lead (DSL) or deputy if you're concerned that a child is stressed about appearing in court or by their involvement in a court proceeding

If appropriate, talk through the young witness guidance booklets from the Courts and Tribunal Service with the child – there are guides for children aged 5 to 11 and 12 to 17

Children with a family member in prison

Why is this potentially a safeguarding issue?

- Children with a family member in prison:

Are at risk of poverty, stigma, bullying, isolation and poor mental health

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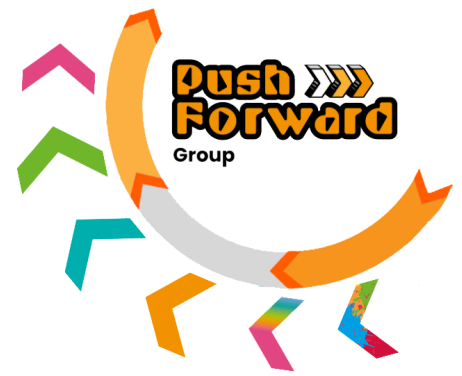


- Might not do as well at school
- Are likely to feel the effects at home (for example, their family finances might suffer, or they might have to move or take on extra responsibilities at home)
- As a education establishment, we have a duty to promote children’s welfare – this includes taking action to enable all children to have the best outcomes and protect their mental health.

What can I do?

- Look out for signs that a pupil’s family member might be in prison
- The child or their family might not tell us due to fear of stigma. Share any concerns you have with the DSL (or deputy). Look out for signs such as:
 -
 - Changes in a child’s family situation, e.g. where they live or family finances
 - Stigma from other children and/or their families, e.g. being bullied or hostility from within the community
 - Changes in a child’s behaviour and emotional wellbeing
 - Not concentrating as well and not doing as well at school
 - Support the child in school
 - Get advice from our DSL (or deputy) on how this child is being supported. Remember, every child is different, so there won’t be a one-size-fits-all approach
 - Be non-judgemental – the child hasn’t done anything wrong
 - Be consistent, firm and sensitive in response to their needs, including aggressive behaviour
 - Be particularly sensitive to their needs if they’ve been to visit a relative in prison, as this is likely to be an upsetting and difficult experience
 - Let the child know they can talk to you about their feelings
 - Deal with any bullying they experience in line with our policies and procedures
 - Remember confidentiality and privacy: don’t tell anyone who doesn’t need to know, or put the child in a situation where they need to tell a peer about it
 - Refer the child for counselling if you think they need extra support, in consultation with our Wellbeing manager.
- Be alert to whether the child might need early help

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Private fostering

What is it?

- When someone other than a parent or close relative becomes responsible for the day-to-day care and accommodation of a child under 16 (or 18, if the child has disabilities). A private foster carer could be:
 - A friend of the family
 - Someone previously unknown to the family who is willing to care for the child
 - A member of the extended family (grandparents, siblings, aunts, uncles and step-parents don't count as private foster carers)
 - The arrangement is private fostering if it will last for 28 days or more, and the parent(s) or private foster carer(s) must notify the local authority so it can make sure the child will stay safe and well.
 - Why should we be concerned?
- Children who are privately fostered are more likely to potentially need early help. They may also be 'hidden' if the arrangement isn't reported to the local authority, and could be living in unsafe arrangements, or be at risk of abuse.
- One high-profile example is Victoria Climbié, who was privately fostered and tragically murdered in 2000 after being abused in her private fostering arrangement.

What should I look out for?

- A new arrival, particularly from abroad, or a child moving without a given reason
- A child mentioning living with someone other than their family
- A child being dropped off or picked up by different adults
- Carers who are vague about the child's routines, needs and education

What should I do if I have concerns?

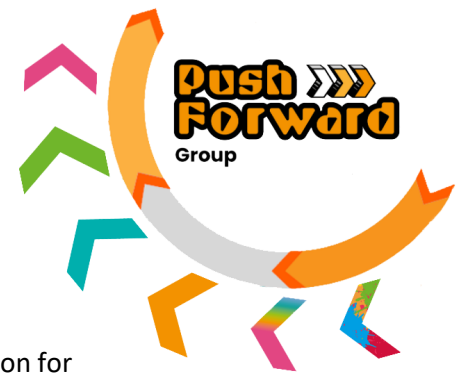
- Report them to the designated safeguarding lead (DSL) or deputy and make a written record

If you think a child is in immediate danger, make a referral to the local authority children's social care team, and call the police if appropriate. Don't delay to wait for the DSL, but let them know as soon as possible too

Checking the identity and suitability of visitors

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

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

Visitors are expected to sign the visitors' log and wear a visitor's badge.

Visitors to Pushforward who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into Pushforward any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using Pushforwards facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of young person

If a young person is not collected at the end of the session/day, we will:

- Call parent / guardian to find out possible reason for non-collection, e.g. parent stuck in traffic
- If no contact can be made staff will try all emergency contacts on file
- If no contact can be made with member of family
- The police will be called and informed of non collection
- If the young person is known to social care the social worker will be contacted
- Staff will remain with the young person until police social care arrive. This maybe on site or outside the home address
- Staff will not enter the home address with the young person outside the property

Missing pupils

Our procedures are designed to ensure that a missing young person is found and returned to effective supervision as soon as possible. If a young person goes missing, we will follow the young person missing policy.

Safeguarding pupils on work experience

Work experience provides a number of benefits for children. It can help with their development and also help them choose their vocation for later life. For pupils to get the most out of this experience it is essential that Pushforward and the employer work together to ensure the pupils' safety and wellbeing.

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Aims and objectives

Work experience should have clear aims and objectives and identify what the pupil will get out of the experience. The placement should be chosen to reflect the interests and needs of the pupil. Involving the pupil in making arrangements for their work experience helps to keep them engaged in the process.

Expectation

All pupils should be expected to take part in the work experience scheme. The school should identify pupils who have additional needs or who may be vulnerable outside of the routine of school life. The school should ascertain the suitability of work experience placements even if pupils have themselves identified a placement.

Organisation

Pupils should be aware of the member of staff who is responsible for their work experience placement and be told how to contact them when on placement if they have any problems.

Pushforward support

Pushforward will provide safeguards such as; undertaking initial checks, checks during the placement and helping pupils to prepare for their placement. This will involve working closely with work experience placements to ensure that the correct employment checks, health and safety considerations and any other safeguards, such as risk assessments are in place. Pushforward and the work experience placement should clearly identify responsibilities for ensuring these checks are in place.

Parental Support

It is important that Pushforward engage with parents to discuss work experience placements and gain the relevant consent to say that the child can take part.

Safeguarding Children staying with host families (Something to be aware of)

Engaging with Host Family Providers or Guardianship Organisation

From time to time, family services may engage the services of a host family before coming to us. Where Guardianship Organisations have been employed in order to source families for pupils to stay with. All host family providers contracted by family services must be members of the Association for the Education and Guardianship of International Students ("AEGIS") and be willing to undergo inspections of their safeguarding practice.

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All host family providers must:

- provide a copy of their own safeguarding and/or child protection policies to Pushforward Support staff, the host school, the host family and to the student's parents, should they request it;
- share information required by Pushforward for the purposes of safeguarding and provide such information in a timely manner;
- work collaboratively with Pushforward and the host family in making host family arrangements;
- act in the best interests of the children they are placing with host families; and
- act honestly and with integrity so as not to diminish the reputation of Pushforward

Disclosure and Barring Service (“DBS”) Checks

Suitability checks must be carried out on any individual carrying out a ‘regulated activity’. In broad terms, ‘regulated activity’ is any position that has direct contact with children, or a position which manages staff who work with children. Due to the nature and frequency of most host family arrangements, acting as a host family will normally be a regulated activity. No pupil must be placed with a host family until all necessary checks have been completed.

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Appendix 5

Local Safeguarding Partnerships and Early Help

Suffolk Safeguarding Partnership

MASH Professional on 0345 606 14 99

Customer First on **0808 800 4005**

<https://earlyhelpportal.suffolk.gov.uk/web/portal/pages/marf#h1>

Early Help

https://www.suffolk.gov.uk/young_personren-families-and-learning/eha/make-a-referral-for-an-eha

Cambridge Young Person Services

Customer Service Centre on 0345 045 5203

https://cambridgeshire-self.achieveservice.com/service/Make_a_professional_referral_to_Cambridgeshire_County_Council_Young_personren_Services

Early Help

https://www.cambridgeshire.gov.uk/residents/young_personren-and-families/parenting-and-family-support/providing-young_personren-and-family-services-how-we-work/early-help-assessments

Norfolk Safeguarding Partnership

Young person's Advice and Duty Service on their direct line: **0344 800 8021**.

Early Help

https://www.norfolk.gov.uk/article/40407/Early-help-for-young_personren-and-families

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Appendix 6

SAFEGUARDING REPORTING & PARENTAL CONTACT GUIDELINES

Tier	Examples	Tutor Action	DSL Action	Parental Contact
Tier 1 RECORD <i>(Low-level)</i>	<ul style="list-style-type: none"> Swearing, shouting, refusal to work Emotional distress (crying, anger, shutdowns) Trauma-based responses Minor injuries with explanation One-off comments about home Peer arguments 	<ul style="list-style-type: none"> Document incident, report to DSL 	<ul style="list-style-type: none"> Monitor internal records for patterns 	<ul style="list-style-type: none"> Routine updates via tutor/mentor; no DSL contact needed
Tier 2 REVIEW <i>(Emerging Concerns)</i>	<ul style="list-style-type: none"> Repeated distress emerging self-harm behaviours (scratching, picking, talking about hurting self) Frequent worries about home Multiple minor incidents forming a pattern 	<ul style="list-style-type: none"> Document and report all incidents 	<ul style="list-style-type: none"> Review patterns, consider Early Help or support strategies, decide on proportionate parental contact 	<ul style="list-style-type: none"> DSL may contact parents to discuss patterns and strategies
Tier 3 REFER <i>(High-risk)</i>	<ul style="list-style-type: none"> Abuse, neglect, sexual or criminal exploitation. Serious self-harm or suicidal behaviour 	<ul style="list-style-type: none"> Report immediately 	<ul style="list-style-type: none"> Initiate safeguarding referral to social care and other agencies 	<ul style="list-style-type: none"> DSL contacts parents immediately unless unsafe

KEY PRINCIPLES

- Safeguarding information must only be shared externally when **necessary, proportionate, relevant, and lawful**.
- Recording all incidents internally is essential for monitoring **patterns** and escalation.
- Parents should be **contacted proportionately**: routine low-level concerns through tutor updates, emerging concerns by DSL as appropriate, and **high-risk concerns immediately**.