



CHILD PROTECTION AND SAFEGUARDING POLICY (Non-school Alternative Provision)

Policy title	Child Protection & Safeguarding Policy (Non-school Alternative Provision)
Applies to	All pupils, parents/carers and staff
Policy owner	Directors
Approved on	September 2026
Next Review	September 2027 (or sooner if statutory guidance changes)

PURPOSE

The purpose of this policy is to ensure that Applewood Learning Ltd takes timely action to safeguard and promote children's welfare; that all staff understand their safeguarding responsibilities; and that staff are properly trained to recognise, respond to and report safeguarding concerns. As a non-school Alternative Provision, Applewood Learning Ltd uses Keeping Children Safe in Education (KCSIE) 2026 and local safeguarding procedures as core safeguarding benchmarks, alongside the statutory responsibilities retained by commissioning schools and local authorities.

SCOPE

This policy applies to Applewood Learning Ltd staff (employees, agency workers, contractors, casual staff and volunteers). Visitors follow site-safety and safeguarding instructions and are **not** left unsupervised with children.

Where education is delivered using personal devices and home or public internet connections, filtering and monitoring arrangements are proportionate to the level of organisational control, as set out in the E-Safety Policy.

SAFEGUARDING COMMITMENT

As an organisation that prioritises the safeguarding of children and all vulnerable people, Applewood Learning Ltd is committed to providing a safe environment across all we do by actively adopting strategies that embed a culture of zero tolerance for abuse of any kind.

RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and those in leadership in the provision. Applewood Learning Ltd shares significant safeguarding information with parents/carers and the commissioning school/LA the same day, and follows local missing/absent and CME procedures alongside commissioners. Our policy and procedures also apply to extended provision and off-site activities.



The provision plays a crucial role in preventative education. This is in the context of a whole-provision 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
- Planned programme of wellbeing lessons, which are inclusive and delivered regularly, tackling issues such as:
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable
 - Health and respectful relationships

All staff

All staff will:

- Read and understand KCSIE 2026 Part One in full. KCSIE 2026 has removed the former condensed Annex A; all staff, including volunteers and staff who do not work directly with children, receive role-relevant induction and are expected to understand the safeguarding expectations in Part One. Annex B (Role of the Designated Safeguarding Lead) is read by the DSL and deputy DSL and by others where relevant to their role.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for young people who are LGBTQ+ to speak out and share their concerns. Staff must not promise confidentiality; they explain next steps and support, and record concerns on the safeguarding system the same day.

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- The local continuum of help and support, including universal services and community-based early help and, where appropriate, targeted early help through Family Help; their role in identifying emerging needs, liaising with the DSL and sharing information with other professionals to support timely assessment and intervention
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play



- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including physical, sexual and emotional abuse, domestic abuse, stalking, modern slavery, financial exploitation, child-on-child abuse (including harassment and violence), grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), serious violence, county lines, FGM, forced marriage and radicalisation. Staff will recognise that safeguarding issues often overlap and may occur simultaneously online and offline, and that children may experience multiple harms at the same time, including extra-familial harm and group-based exploitation
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that being lesbian, gay or bisexual is not in itself a safeguarding risk, but children who are, or are perceived to be, lesbian, gay or bisexual can be vulnerable to discriminatory bullying; and that children questioning their gender may also experience vulnerabilities, including bullying or complex psychosocial needs, which should be considered on an individual, child-centred basis
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

The designated safeguarding lead (DSL)

Designated Safeguarding Lead: Louise Venables	Louise.venables@applewoodlearning.co.uk Tel: 07736 151173
Deputy Designated Safeguarding Lead: Carol Brooks	Carol.brooks@applewoodlearning.co.uk Tel: 07913 102330

The DSL is a member of the provision leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the provision. This includes online safety and understanding our filtering and monitoring processes on Applewood Learning Ltd devices and networks to keep pupils safe online. Applewood Learning Ltd adopts DfE filtering & monitoring standards as good-practice benchmarks for a non-school AP and reviews them annually with IT support.

During term time, the DSL will be available during provision hours for staff to discuss safeguarding concerns. The DSL ensures same-day liaison with the commissioner for significant incidents/risks and maintains a written DSL↔commissioner contact protocol. Applewood Learning Ltd also maintains a clear, reliable and known cover arrangement so that safeguarding concerns can always be raised when the DSL is unavailable, including access to the deputy DSL and an agreed confidential contact route.

When the DSL is absent, the deputy DSL will act as cover and will have access to the information



and authority needed to respond promptly.

If neither the DSL nor deputy DSL is available, an identified member of the Education Leadership Team/Directors will provide safeguarding cover. This arrangement is communicated to staff in advance and must not delay emergency action, referrals or contact with children's social care or the police.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, 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 that apply to Applewood Learning Ltd devices, systems and the locations in which the provision operates
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Understand and reflect the local multi-agency response to harmful sexual behaviour, sexual harassment and sexual violence, and ensure Applewood Learning Ltd policies and procedures remain aligned with local safeguarding arrangements
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

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

The Education Leadership Team/Directors

The Education Leadership Team/Directors will:

- Facilitate a whole-provision approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the provision lead to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty where applicable), data protection laws and relevant local multi-agency safeguarding arrangements
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the provision has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:



- Making sure that the leadership team and 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 what needs to be done to support the provision in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-provision approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The provision 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). Low-level concerns and allegations interface with Managing Allegations policy; commissioners are informed where relevant to their duties.
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the provision roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the other body to liaise with Applewood Learning Ltd and, where relevant, the commissioning school/local authority about safeguarding arrangements
- Where Applewood Learning Ltd arranges or controls the use of a venue by another body, make safeguarding requirements a condition of that arrangement and end the arrangement if safeguarding requirements are not met

The Director of Education, on behalf of the Education Leadership Team/Directors will act as the 'case manager' in the event that an allegation of abuse is made against the provision lead, where appropriate.

All members of the Education Leadership Team/Directors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how Education Leadership Team/Directors members are supported to fulfil their role.

The Provision Lead

The Provision Lead 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 child joins the provision and via the provision website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

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.

Making or sharing nudes and semi-nudes means the creation, sending or posting of nude or semi-nude visual content involving a person under 18. Images may be self-generated, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including 'deepfakes' or 'deep nudes'. Every incident involving the making or sharing of nudes or semi-nudes requires a safeguarding response, whether the activity is consensual or non-consensual.

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.

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

POLICY

Aims

Applewood Learning Ltd aims to ensure that:

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

Equality statement

Applewood Learning Ltd promotes anti-racist and anti-discriminatory safeguarding practice. Staff are expected to recognise and challenge racism and discrimination, remain alert to disproportionality, and consider how a child's experiences of discrimination may affect their safety, wellbeing and willingness to seek help.

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- 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

Confidentiality

Confidentiality and data protection within Applewood Learning Ltd are covered in more detail in our Data Protection Policy. The following principles apply when sharing safeguarding information within the provision and with commissioners, safeguarding partners and other agencies as



required:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- Data protection laws - the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 - do not prevent or limit proportionate information sharing for the purpose of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks Applewood Learning Ltd 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 children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all 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 children 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 children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
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From September 2026, Applewood Learning Ltd will also have regard to the new statutory information-sharing duty introduced by the Children's Wellbeing and Schools Act 2026 where it applies to the provision or to organisations commissioning or engaging Applewood's services. Applewood will review and implement the Department for Education's final statutory guidance on this duty when published. Pending final guidance, staff must continue to share safeguarding information lawfully, proportionately



and without delay where this is necessary to safeguard or promote a child's welfare.

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and is available to support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff

One-to-One Situations (Being Alone with a Child)

Applewood Learning Ltd frequently delivers education on a one-to-one basis, including in pupils' homes, libraries, community venues and online. One-to-one working is an approved part of the provision and must be carried out in accordance with safeguarding, lone-working, risk assessment and staff conduct procedures.

- One-to-one sessions will only take place where they are authorised as part of the child's agreed provision or specifically approved by Applewood Learning Ltd.
- For authorised one-to-one work, staff will:
- Use the safest available environment and maximise appropriate visibility where possible, while respecting the child's privacy and dignity. In homes or community venues, staff will follow the location-specific risk assessment and agreed working arrangements
- Ensure Applewood Learning Ltd and, where appropriate, the parent/carer or commissioner know the agreed location and session time, and follow the staff check-in/check-out procedure
- Keep sessions within the agreed times and purpose and maintain clear professional boundaries
- Record attendance and any significant welfare, behavioural or safeguarding information arising from the session in accordance with Applewood Learning Ltd procedures
- Parents/carers and/or commissioners will be informed where ongoing one-to-one sessions form part of the child's agreed provision, subject to commissioning and safeguarding arrangements
- Staff must never arrange unauthorised contact or private meetings with a child outside the agreed education provision. Approved one-to-one sessions in a child's home, library, community venue, online or another agreed location are permitted when they form part of the authorised provision and the relevant safeguards are in place.
- Staff will immediately report to the DSL any situation where they feel the child's behaviour, or the circumstances of a one-to-one meeting, has caused concern.

These measures are designed to reduce the risks associated with unsupervised contact and to protect both pupils and staff.

Recognising abuse and taking action

All staff are expected to identify and recognise all forms of abuse, neglect and exploitation and to remain professionally curious. Staff will be alert to children who may benefit from universal services or community-based early help, targeted early help through Family Help, or statutory safeguarding intervention, including a child 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 child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and Education Leadership Team/Directors members must follow the procedures set out below in the event of a safeguarding issue.

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

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

Responding to Safeguarding Concerns

When a record of a safeguarding concern is passed to the DSL, the DSL will record the time and date the record of concern was received. The DSL will assess the concern and, taking into account any other safeguarding information known about the child or young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or whether the child may be a Child in Need.

For children and young people commissioned by Suffolk County Council, if the DSL is unsure whether the threshold has been met, they will contact the MASH Professional Consultation Line for advice (0345 606 1499). Where appropriate, the DSL will complete and submit the Suffolk County Council Multi-Agency Referral Form (MARF). Where the DSL believes that a child or young person may be at imminent and significant risk of harm, they will contact Customer First immediately and complete the MARF within 24 hours to confirm the referral. Consultation must not delay a referral where there are concerns about immediate risk.

Where a safeguarding concern does not meet the threshold for completion of a MARF, the DSL will record the rationale for the decision and consider whether needs can be met through universal services, community-based early help, targeted early help through Family Help, or other appropriate support. The child's situation will be kept under review and escalated if risk increases or support is not improving



outcomes.

For children and young people commissioned by other local authorities, Applewood Learning Ltd will follow the safeguarding referral procedures and threshold guidance of the relevant local authority.

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

Tell the DSL as soon as possible if you make a referral directly.

If a child makes a disclosure to you

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

Bear in mind that some children may:

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

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

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 child 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 teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or



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

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

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil 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 it is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

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

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

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

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

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

Early help and Family Help

Where universal or community-based early help is appropriate, the DSL will support proportionate multi-agency working. Where targeted early help through Family Help is appropriate, the DSL will liaise with the relevant local authority and partner agencies. A suitably experienced non-social-work practitioner may lead an assessment where this is consistent with local arrangements. Staff may be required to contribute to assessments or act as lead practitioner where appropriate. Local assessment protocols and safeguarding thresholds will be followed.

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

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

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL



will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

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

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

Local procedures for referral and escalation can be found here:

<https://eycp.essex.gov.uk/safeguarding/request-support-or-report-a-concern-about-a-child/>

If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the provision leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

The DfE also has a dedicated telephone helpline, 020 7340 7264, which alternative provisions and non-school settings as well as schools 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

Children requiring mental health support

Mental health problems can develop into safeguarding concerns and may also indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Warning signs can include self-harm, eating disorders, suicidal ideation or suicide risk.

Staff are not expected to diagnose mental health conditions. They will observe children, identify emerging concerns, promote wellbeing, support early targeted help and liaise with or refer to specialist services where needed.



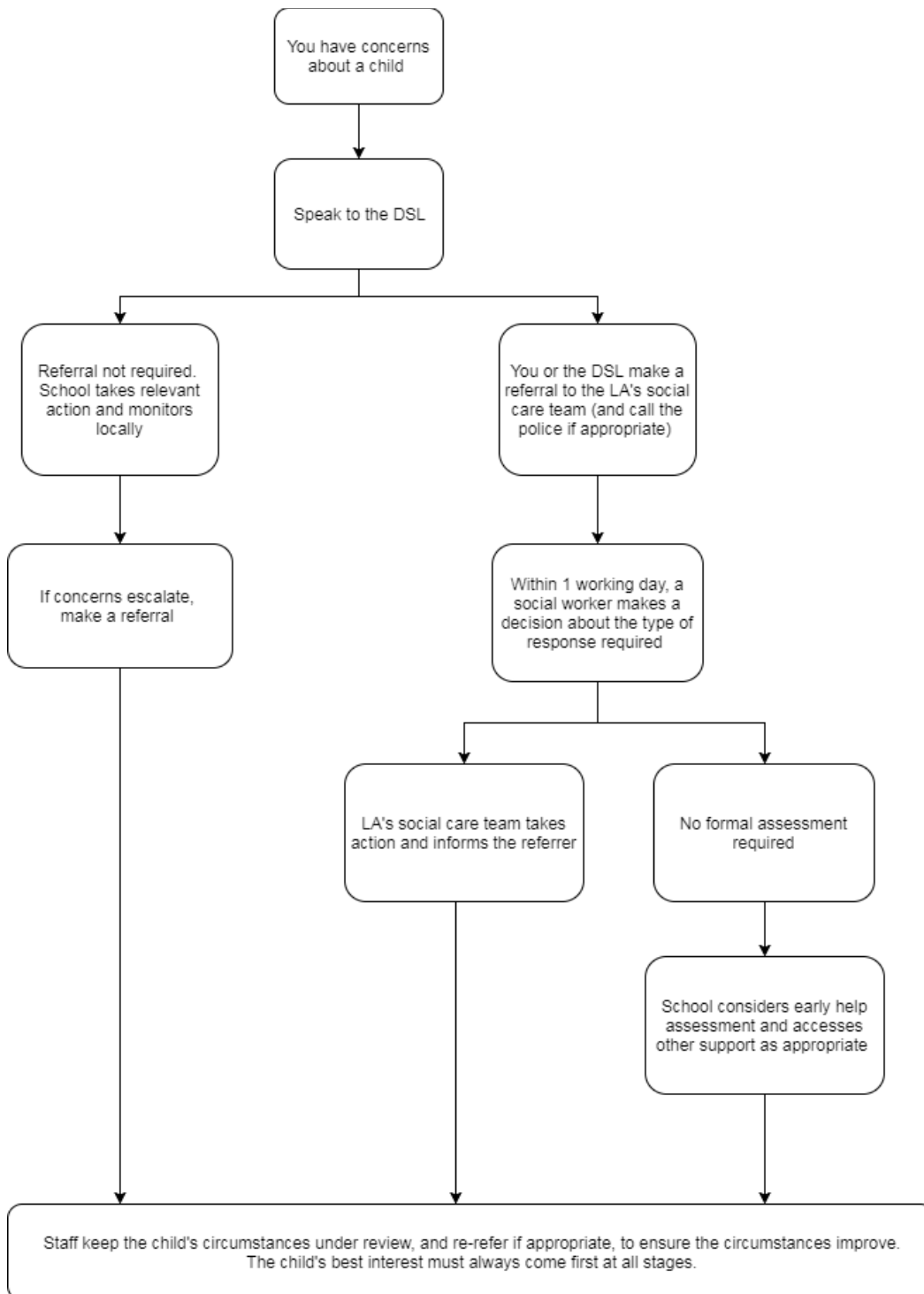
Where a mental health concern is also a safeguarding concern, staff must follow this policy immediately and inform the DSL. If a child is in immediate danger, call 999 or arrange emergency medical assistance. Urgent non-emergency mental health help can be sought through NHS 111.

Where a mental health concern is not currently a safeguarding concern, staff should speak to the DSL/appropriate lead so that suitable support can be considered. Parents/carers should normally be involved where this supports the child's wellbeing and does not place the child at additional risk.

Applewood Learning Ltd will consider locally available support and relevant DfE/NHS guidance on promoting children and young people's mental health and wellbeing.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See above for what to do.)





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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the provision lead as soon as possible. If the concerns/allegations are about the provision lead, speak to a representative of the Education Leadership Team/Directors.

The Provision Lead/Education Leadership Team/Directors representative will then follow the procedures set out in appendix 3, if appropriate.

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

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

Child-on-child abuse (including harassment and violence)

We recognise that children can abuse other children and that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. It is preventable, must never be dismissed as “banter” or “part of growing up”, and may involve serious physical harm, threats involving weapons, sexual harassment, sexual violence or online abuse.

We recognise that some forms of child-on-child abuse are gendered, including misogynistic or misandrist behaviour, but all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our provision’s 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 provision at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as exposure, sexual assault, upskirting or sexually inappropriate images/videos, including the consensual or non-consensual making or sharing of nudes or semi-nudes, including AI-generated or digitally manipulated imagery

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

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

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence. Behavioural consequences within Applewood Learning Limited sessions follow the Behaviour Policy; where statutory powers (e.g., suspension/exclusion) are required, these are led by the



commissioning school/LA.

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

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

We recognise that child-on-child abuse is preventable. We will take proactive action to minimise risk, challenge harmful attitudes and behaviour, and create a supportive environment in which children can report concerns and victims and alleged perpetrators receive appropriate safeguarding support.

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 young people about appropriate behaviour and consent
- Ensure young people can easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- 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 children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure 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 in the provision, 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 child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a



direct report. For example:

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

The DSL will take the lead 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 provision from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

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

Making or sharing nudes and semi-nudes

Your responsibilities when responding to an incident

If you are made aware of any incident involving the consensual or non-consensual making or sharing of nude or semi-nude images/videos involving a child, including digitally altered or wholly AI-generated images, you must report it to the DSL immediately. Every such incident requires a safeguarding response.

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
- 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, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved



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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate Applewood Learning Ltd 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 children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- 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 child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to 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
- 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 Education Leadership Team/Directors and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

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 pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the 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 dialing 101.

Recording incidents

All incidents involving the making or sharing of nudes and semi-nudes, and all decisions and actions taken in response, will be recorded. The record-keeping arrangements set out in this policy apply to these incidents.

Curriculum coverage

Pupils are taught, in an age-appropriate way, about the risks and legal/safeguarding issues relating to the making and sharing of nudes and semi-nudes, including AI-generated or digitally manipulated sexual imagery, within the provision's relationships, wellbeing and online-safety education.

- 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:

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

Children are made aware, in an age-appropriate way, of how Applewood Learning Ltd will respond to incidents involving the making or sharing of nudes and semi-nudes and how they can seek help without fear of blame or shame.

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

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

Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when

determining what action to take and what services to provide.



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

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
- 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 children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our provision aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Directors.
- Protect and educate the whole provision community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole provision community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, 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 children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and 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' contact. 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 are allowed to bring their personal phones to provision sessions for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and Education Leadership Team/Directors members aware that they are expected to sign an agreement regarding the acceptable use of the internet in the provision, use of the provision's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a young person is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers understand that Applewood Learning Ltd does not have statutory school search powers. We use consent-based checks, secure storage of voluntarily surrendered items, and involve parents/carers and/or police where risk or suspected criminality warrants. Staff follow the Behaviour and E-Safety policies and the NPCC 'When to call the police' thresholds.
- Carry out an annual review of online-safety risks and, at least once each academic year, review the effectiveness of filtering and monitoring arrangements. The review will be led by the senior leader responsible for filtering and monitoring, supported by the DSL and IT support, and will include checks that filtering works appropriately on Applewood Learning Ltd internet-connected devices in all relevant delivery locations/settings within our control. A written record of the checks and any actions required will be retained.
- Provide regular safeguarding and children 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 child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. Online safety arrangements are detailed further in the organisation's E-Safety (Online Safety) Policy, which should be read alongside this safeguarding policy.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are increasingly used in education. Applewood Learning Ltd recognises potential benefits for teaching, learning and safeguarding, alongside risks including harmful content, grooming, bullying, misinformation, privacy/data risks and the creation of sexualised or abusive deepfakes.

Any use of generative AI within Applewood Learning Ltd must be safe, effective, age-appropriate and consistent with safeguarding, data protection, online-safety and acceptable-use expectations. Staff must consider what information is entered into AI systems and must not input confidential or



special-category pupil information into unapproved tools.

Any use of AI to create, access or distribute harmful, abusive, sexualised, bullying or exploitative content will be treated as a safeguarding matter and addressed under this policy and relevant behaviour/anti-bullying procedures.

New AI tools used for provision activity will be subject to proportionate risk assessment, including safeguarding, privacy, data protection, age suitability, accuracy and filtering/monitoring considerations. Staff will receive updates as AI risks and guidance develop.

Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Applewood Learning Ltd also notifies the **commissioning school/LA the same day** for significant incidents/risks, agreeing next steps and lead professional.

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 child, we will discuss this with the local authority children's social care team before doing so.

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

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

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

Pupils with special educational needs, disabilities or health issues

We recognise that children with SEND or certain health conditions can face additional safeguarding challenges and may experience greater vulnerability to abuse, neglect and exploitation. Staff must avoid assuming that changes in behaviour, mood, injury or attendance are explained by a child's condition without further exploration.

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child'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 or communication barriers, including difficulty understanding the difference between fact and fiction in online content, recognising that behaviour is abusive, reporting concerns, or



understanding the consequences of online or offline behaviour

Any report of abuse involving a child with SEND requires close liaison between the DSL (or deputy) and SENCO, with appropriate communication support and additional pastoral attention considered.

Safeguarding children with medical conditions

A medical incident does not automatically require a safeguarding referral. A referral will be considered where an incident or pattern suggests that a child may be at increased risk of neglect, abuse or exploitation because of their medical condition, for example where essential information or medication is repeatedly withheld or not provided and this places the child at risk.

Pupils with a social worker

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

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

Where we are aware that a pupil has a social worker, the 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:

- 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 children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- Young carers
- Applewood Learning Ltd will be alert to the needs of young carers. Caring responsibilities can affect attendance, attainment, behaviour and wellbeing. Early identification is important so that suitable support can be offered through the provision, commissioners, local authority, health services or other partners as appropriate.

Children who are lesbian, gay or bisexual, and children questioning their gender

Being lesbian, gay or bisexual is not itself a safeguarding risk. However, children who are, or are perceived to be, lesbian, gay or bisexual can be vulnerable to discriminatory bullying. Applewood Learning Ltd will take steps to prevent and respond to this and will ensure children have trusted adults with whom they can raise concerns.

Children questioning their gender may experience vulnerabilities including discriminatory bullying, family or peer relationship difficulties, and complex mental health or psychosocial needs. Staff will



remain professionally curious about the full range of the child's experiences and report safeguarding concerns to the DSL.

Where a child is questioning their gender, Applewood Learning Ltd will respond on an individual, child-centred basis, with safeguarding, welfare and equality considerations at the forefront. Staff will listen to the child, consider any bullying, SEND, family circumstances or wider psychosocial needs, and involve parents/carers unless doing so would place the child at risk of harm. Any decisions about changes within the provision will be made cautiously, recorded appropriately, and informed by current statutory guidance, legal duties and, where necessary, specialist advice.

Support for a child questioning their gender will be child-centred and safeguarding-led. Staff will consider any wider vulnerabilities, including bullying, SEND, family circumstances and mental health or psychosocial needs, and will avoid making assumptions or treating gender non-conforming interests or behaviour as a safeguarding concern in themselves.

Parents/carers will normally be involved in decisions about support unless doing so would create a significant risk of harm. The DSL will consider available professional advice and ensure that any safeguarding concerns are addressed through the normal safeguarding procedures.

Risks can be compounded where children lack trusted adults. Applewood Learning Ltd therefore aims to create a culture in which all children can speak openly, are listened to, and can report bullying, discrimination or safeguarding concerns safely.

Complaints and concerns about provision safeguarding policies

Complaints against staff

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

Other complaints

Complaints that do not involve child protection will be handled under the Applewood Learning Ltd Complaints Policy.

Whistle-blowing

Applewood Learning Limited's whistle-blowing policy is available on request and via our website.

Record-keeping

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

All safeguarding concerns, discussions, decisions and the rationale for those decisions must be recorded in writing. Records must be clear and factual and should distinguish between observed concerns, professional opinion and historic information. This includes recording where referrals were or were not made to children's social care, Family Help, Prevent/Channel, police or another agency.

Records will include:

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



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

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

Safeguarding records relating to individual children will be retained in line with the records retention schedule. Significant safeguarding information relevant to a commissioner's duties is shared securely and promptly, including same-day sharing where risk dictates. At transition points Applewood Learning Ltd will support the commissioner/receiving setting to ensure safeguarding information is transferred, reviewed and acted upon promptly.

If a child for whom the provision has, or has had, safeguarding concerns moves to another setting, the DSL will ensure that relevant safeguarding information is transferred securely and separately from the main pupil information, working with the commissioning school/local authority where they hold the statutory file.

To allow the new school/college to have support in place when the child 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
- Where Applewood Learning Ltd transfers safeguarding information directly, confirmation of receipt will be obtained. The transfer will include a clear structured summary of current safeguarding concerns, relevant context and ongoing support needs, distinguishing current risks from historic information. Where information is unclear or incomplete, the receiving setting should be supported to seek clarification.

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 child.

In addition:

- Our Safer Recruitment Policy sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Our Allegations Policy sets out our policy on record-keeping with respect to allegations of abuse made against staff

Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including whistle-blowing, online safety, filtering and monitoring responsibilities, and the safeguarding risks associated with technology and generative AI. All staff will read KCSIE 2026 Part One in full and receive updates at least annually and whenever significant safeguarding developments require them.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-provision 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 children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

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

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

Volunteers will receive role-appropriate safeguarding induction and training before undertaking activity with children and will read KCSIE 2026 Part One in full. Recruitment and vetting requirements for volunteers, including regulated activity and DBS checks, are set out in the Safer Recruitment Policy and must remain aligned with KCSIE 2026 and current legislation, including the removal of the former supervision exemption from regulated activity.

The DSL and deputy

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years. In addition, the DSL and deputy DSL will complete and record an annual safeguarding update/review covering changes to statutory guidance, local procedures, emerging risks and provision practice.

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.

The Education Leadership Team/Directors

All Education Leadership Team/Directors members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

A Director may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Provision Lead, they receive training in managing allegations for this purpose.

Recruitment – interview panels

At least 1 person conducting any interview for any post at the provision will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in



Education, and will be in line with local safeguarding procedures.

See our Safer Recruitment policy for more information about our safer recruitment procedures.

Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

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.

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' book and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the 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 the provision any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using provision facilities is not seeking to disseminate extremist views or radicalise pupils or staff. Visitors' mobile devices are not used to photograph/record children; visiting speakers are supervised and briefed on Applewood Learning Limited's safeguarding expectations.



POLICY CONTEXT

AP context (non-school AP): Applewood Learning Ltd operates as a non-school Alternative Provision (AP). Commissioning schools/LAs retain statutory responsibilities for admissions, attendance registers/coding, exclusions and Children Missing Education (CME). Applewood Learning Ltd provides same-day safeguarding/attendance information to commissioners and aligns procedures with KCSIE and local safeguarding partner arrangements. Where school-specific statutory powers (e.g., searching/screening) do not apply to AP, Applewood Learning Ltd uses consent-based approaches and police engagement when risk warrants.

This policy relates to the following legislative requirements, standards and internal documents:

Legislation/Standards	Department for Education statutory guidance Keeping Children Safe in Education (2026; effective from 1 September 2026) and Working Together to Safeguard Children (2026). DfE Non-school alternative provision: voluntary national standards (31 Aug 2025) - adopted by Applewood Learning Ltd as benchmarks where relevant to the non-school AP context. Out-of-school settings (OOSS) safeguarding code (as applicable to the AP context). The Children Act 1989 and Children Act 2004. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, and statutory guidance on FGM. The Rehabilitation of Offenders Act 1974 and Safeguarding Vulnerable Groups Act 2006. Crime and Policing Act 2026, including changes to regulated activity and removal of the former supervision exemption. Statutory guidance on the Prevent duty. The Human Rights Act 1998 and Equality Act 2010, including the Public Sector Equality Duty where applicable. The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.
Related Forms & Documents	• Anti-Bullying Policy • Behaviour Policy • Drugs and Alcohol Policy • E-Safety Policy • Safeguarding Statement of Intent • Allegations Policy • Safer Recruitment Policy • Managing Allegations Policy • Complaints Policy • Attendance Policy (AP interface) • Physical Intervention Policy • First Aid & Medication Policy • Online Safety/Filtering & Monitoring Statement.

VERSION CONTROL

This policy was reviewed in August 2026 against KCSIE 2026 and Working Together to Safeguard Children 2026. It will be reviewed at least annually and sooner where legislation, statutory guidance, local safeguarding arrangements or the Applewood Learning Ltd operating model changes.



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 child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It can include verbal abuse such as persistent criticism, belittling or name-calling. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

Emotional abuse may involve:

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

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

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

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

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



pregnancy as a result of maternal substance abuse.

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

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

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

Sexually motivated incidents

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

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

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

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

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- 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 child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

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

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

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

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

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

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

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

Children who are absent from education

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

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



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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes providing same-day information to the commissioning school/LA, who lead statutory register actions and CME escalation. Applewood Learning Ltd contributes to enquiries and records contact attempts and risks.

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

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse in which an individual, group, organised network or gang takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve exchange for something the child needs or wants, financial or other advantage to the perpetrator/facilitator, violence or threats. Victims may identify as part of the group exploiting them and may be criminalised for actions taken under coercion. CCE can constitute modern slavery and should be considered within local referral and National Referral Mechanism arrangements where appropriate.

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late



- Regularly missing school or education
- Not taking part in education

If a member of 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 child sexual abuse in which an individual, group, organised network or gang takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the child needs or wants and/or financial advantage or increased status for the perpetrator or facilitator, with or without violence or threats. Victims may identify as part of the network or relationship and may not recognise that they are being exploited. CSE may constitute modern slavery and can occur online or offline.

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

If a member of 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 (including harassment and violence)

Child-on-child abuse is abuse by one child or children against another child or children. It can occur inside or outside education settings, face to face, online, or simultaneously across both. It is a safeguarding issue for the victim and alleged perpetrator, is preventable, and may involve serious physical harm or threats involving weapons.

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



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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child-to-parent or care-giver abuse. Domestic abuse can be physical, sexual, financial, psychological or emotional and can include ill treatment that is not physical, as well as seeing, hearing or experiencing the effects of abuse.

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

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence



in their own personal relationships. This can include sexual harassment.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the provision (usually the designated safeguarding lead) before the child or children attend their next scheduled provision session.

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

Homelessness

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

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

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

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

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

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

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child 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 children 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
- 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 children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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 fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school 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

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.

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

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

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

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

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

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – 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.

Child-on-child sexual harassment, harmful sexual behaviour and sexual violence

Sexual violence and sexual harassment can occur:

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

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

Children who are victims of sexual violence and sexual harassment will likely find the experience 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 provision.

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 child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider whether wider cultural or environmental issues within the provision or local context enabled inappropriate behaviour and whether policies, curriculum, supervision or staff



training should change to reduce recurrence

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children 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 child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Serious violence

Serious violence is a continuing safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, peer conflict, bullying or criminal exploitation. Staff must report concerns about a child carrying or using a weapon, or expressing an intention to do so, to the DSL immediately. The DSL will assess risk to the child and others and consider a safety/support plan and action to de-escalate peer conflict.

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

Risk factors that may increase vulnerability to serious violence include disrupted education (including suspension, permanent exclusion or time in alternative provision), previous offending, child maltreatment, early drug/alcohol use, and previous experience as a victim or perpetrator of violence. Risk must be assessed in the context of the individual child rather than by any single factor.

- Staff should also consider when and where risk is highest, including travel to and from sessions or immediately before/after provision, and should work with commissioners and local partners to understand locations or peer contexts where children feel unsafe.
- Applewood Learning Ltd will listen to children and staff to understand local risks and will share relevant safeguarding information with commissioners and partners to support a coordinated response.
- Children involved in violence may themselves be victims of abuse or exploitation; responses will therefore combine risk management with safeguarding support.
- Any immediate risk of serious harm or weapon-related incident will be escalated to police/emergency services as appropriate, without waiting for the DSL if delay would



increase risk.

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.