

Safeguarding Policy and Procedures

Key Safeguarding contacts

Any concerns of a safeguarding nature should be immediately reported to Fleet Education Services Deputy DSLs or DSL or who can be contacted on:

Designated Safeguarding Lead:

Linda Chapman: 07946 673351 / linda.chapman@fleeteducationservices.com

Deputy Designated Safeguarding Lead team:

Lydia Stannard: 01252 386023 / lydia.stannard@fleeteducationservices.com

Ruth Brace: 01252 386019 / ruth.brace@fleeteducationservices.com

Lindsay Sutheran: 01252 386048 / lindsay.sutheran@fleeteducationservices.com

Managing Director – Fleet Education Services – Dave Burchett – 07938 600672

Email: safeguarding@fleeteducationservices.com

NSPCC Helpline

0808 800 5000

Childline

0800 1111

This is a core policy that forms part of the induction for all staff and tutors. It is a requirement that all members of staff and tutors have access to this policy and sign to say they have read and understood its contents. It will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

If a child or vulnerable adult is in immediate danger you should dial 999

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Introduction and Ethos

- Fleet Education Services recognises our statutory responsibility to safeguard and promote the welfare of all children and vulnerable adults. Safeguarding is everybody's responsibility, and all those directly connected (staff, tutors, directors, parents, families and learners) are an important part of the wider safeguarding system and have an essential role to play in making them safe and secure.
- The welfare of children and vulnerable adults is paramount in all the work we do and in all the decisions.
- Where safeguarding is concerned, staff and tutors at Fleet Education Services are advised to maintain an attitude of 'it could happen here'. When concerned about the welfare of a child or vulnerable adult, staff will always act in the best interests of the child or vulnerable adult.
- Fleet Education Services believe that the best interests of children & vulnerable adults always come first. All children (defined as those up to the age of 18) and vulnerable adults have a right to be heard and to have their wishes and feelings taken into account and all children, regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation/identity have an equal right to protection from all types of harm or abuse
- All Fleet Education Services staff believe that the service provided through tuition should provide a caring, positive, safe and stimulating environment, that promotes the academic, social, physical and moral development of the individual. We recognise the importance of promoting an environment that helps children & vulnerable adults be and feel safe. Children & vulnerable adults are respected and encouraged to speak openly.
- We will ensure children's and vulnerable adult's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- All our staff understand safe professional practice and adhere to our safeguarding policies.

Our core safeguarding principles are:

- Prevention - positive, supportive, safe culture, curriculum and pastoral opportunities, safer recruitment procedures.
- Protection - following the agreed procedures, ensuring all staff & tutors are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- Support - for all learners, tutors, staff, and where appropriate specific interventions are required for those who may be at risk of harm.
- Working with parents and other agencies - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

Safeguarding and promoting the welfare of children & vulnerable adults is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. (KCSIE Sept 2023)

2.0 Aims of Safeguarding Policy

Fleet Education Services will endeavour to safeguard children and vulnerable adults by:

- Adopting child vulnerable adult protection guidelines through a code of behaviour for staff and tutors
- Sharing information about child & vulnerable adult protection, safeguarding and good practice with children, vulnerable adults, parents/carers, staff and tutors (see appendices)

- Sharing information with agencies who need to know about concerns and involving parents/carers, children & vulnerable adults as appropriate
- Following carefully the procedures for safer recruitment and selection of staff and tutors
- Providing effective management & support for staff and tutors through supervision, and training
- Providing a working environment in which children and vulnerable adults vfeel safe, secure, valued and respected so they know how to and feel confident to approach adults if they are in difficulties, believing they will be listened to
- Ensuring communication between tutors, managers, DSLs, clients and external agencies (Designated Officer (formerly LADO), Police, Social Care etc.)
- Review the policy and procedures against government guidance, communicating updates regularly and updating the policy annually
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective Child Protection Policy.
- The procedures contained in this policy apply to all staff, including directors, tutors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2023.

2.1 Policy Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:

- DfE Keeping Children Safe in Education – Sept 2023 (KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- Framework for the Assessment of Children in Need and their Families 2000)
- The Education Act 2002
- Modern Slavery Act 2015
- Ofsted: Education Inspection Framework' 2021
- Channel Duty Guidance. Protecting vulnerable people from being drawn into terrorism (2015).
- Mental Capacity Act 2005

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are learners under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

2.2 Covid 19

- We acknowledge that as a result of Covid 19 some learners may have been exposed to a range of adversity and trauma including bereavement, anxiety, stress or low mood, and in some cases increased welfare and safeguarding risks. We are aware that these learners may be experiencing a variety of emotions in response to the coronavirus. This may particularly be the case for vulnerable children and adults.
- All staff members and tutors will be vigilant about the possible continued impacts of the pandemic on learners' mental wellbeing and act immediately on any safeguarding concerns, including new concerns where children and vulnerable adults are returning, and share their concerns with designated and deputy designated safeguarding leads.

- We are aware of the continued importance for our staff to work with and support social workers, the local authority Virtual School Head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners.
- We will work with other agencies to ensure necessary services and support are followed to support learners.
- We will continue to ensure that arrangements are in place to keep children not physically attending school safe, especially online.
- All our staff who interact with children and vulnerable adults, including online, will continue to look out for signs a child or vulnerable adult that may be at risk. Any such concerns will be dealt with as per this policy and where appropriate, referrals will continue to be made to relevant agencies. In relation to any child receiving remote education. See point 8.4 of this policy & separate Online Policy & Procedure.

2.3 Definitions of Safeguarding

In line with KCSIE 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Fleet Education Services acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying (including cyberbullying)
- Children with family members in prison
- Children Missing Education (CME)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Sexual violence & sexual harassment
- County Lines
- Domestic abuse
- Drugs and alcohol misuse
- Female Genital Mutilation (FGM) & forced marriage
- Gangs and youth violence
- Hate crimes
- Homelessness
- 'Honour' based abuse
- Human trafficking and modern slavery
- Mental health
- Online safety
- Serious violence
- Child on child abuse
- Private fostering
- Preventing radicalisation and extremism
- Upskirting
- Youth produced sexual imagery or "Sexting"

(Also see Appendix 2 & (Also see Part One and Annex B - 'Keeping Children Safe in Education' 2023)

3.0 Safeguarding at Fleet Education Services

3.1 Referral to appropriate authorities

Fleet Education Services is committed to referring safeguarding concerns via the Designated Safeguarding Lead to the appropriate organisation, normally the Designated Safety Officer (DSO - formerly LADO) contributing to the assessment of a child or vulnerable adult's needs and, where appropriate, to on-going action to meet those needs.

3.2 Fleet Education Services' Commitments

In order to ensure children and vulnerable adults are adequately protected, we will ensure that:

- We have a Designated Safeguarding Lead (DSL) and a Deputy DSL team who are appropriately trained
- All staff and tutors are compliant with Fleet Education Services Safeguarding Policy & Procedure and are aware of the indicators of child abuse and how to respond to concerns or disclosures of abuse by children and vulnerable adults (including DBS check on recruitment and updated regularly)
- A copy of our Safeguarding policy is available to clients on request
- The Safeguarding policy is reviewed on an annual basis by the DSL
- Training is provided on a regular basis and clear guidance available to all tutors
- The procedures are regularly tested, and referrals monitored to ensure consistency and develop best practice.
- The policy is available on the company website
- Recruitment procedures follow best practice and safer recruitment principles, with all checks in place prior to tutors being assigned to a child or vulnerable adult.

3.3 Complaints

- Fleet Education Services Complaints Procedure is available on request from parent/carers, learners, staff or clients in the event they wish to report any concerns. This can be found securely stored on SEG People or <https://fleeteducationservices.com/key-information>
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff /tutor will be dealt with following the process outlined in section 7.1- Managing Allegations against Staff of this policy.

4.0 Roles & Responsibilities

- Directors have read and will follow KCSIE 2023.
- The Directors will have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Managing Director will have regard to the KCSIE 2023 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The Managing Director is the nominated director for safeguarding, who will support the DSL and have oversight in ensuring that Fleet Education Services has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

- The Managing Director and senior leadership team will ensure that the Designated Safeguarding Lead is supported in their role and is provided with sufficient time so they can provide appropriate support to staff, children and vulnerable adults regarding any safeguarding and welfare concerns.

4.1 Designated Safeguarding Lead (DSL)

- Fleet Education Services has appointed a Designated Safeguarding Lead (DSL) and a team of Deputy Designated Safeguarding Leads (DDSL) who will have delegated responsibilities and act in the DSLs absence.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding systems, including online safety. Whilst the activities of the DSL may be delegated to the deputies, the ultimate responsibility for safeguarding remains with the DSL and this responsibility will not be delegated.
- The DSL will undergo appropriate and specific training including Prevent training to provide them with the up to-date knowledge and skills required to carry out their role. The Deputy DSL is trained to the same standard as the DSL. The DSL and any deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The DSL will keep the Managing Director informed of ongoing safeguarding issues
- The DSL (and deputy) will be provided with sufficient time so they can provide appropriate support to staff & tutors regarding any new safeguarding and welfare concerns.
- The DSL (and deputies) will provide appropriate guidance and support to staff and tutors regarding safeguarding and welfare concerns (particularly in light of Covid 19). This may include handling of referrals, supporting staff who made the referral and working with other agencies where appropriate.
- They will also:
 - act as the central contact point for all staff/tutors to discuss any safeguarding concerns
 - maintain a confidential recording system for safeguarding concerns
 - ensure adequate and appropriate DSL cover arrangements in response to any disclosures and out of hours and/or out of term activities.
 - ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - represent, or ensure Fleet Education Services is appropriately represented at multi-agency safeguarding meetings
 - be available during term time (during school/ Fleet Education Services working hours) for staff /tutors to discuss any safeguarding concerns.
 - provide regular updates to staff and tutors on any changes in safeguarding guidelines or policy
 - oversee safeguarding systems within the organization including management of records, standards of recording concerns and referral processes
 - ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE
- Appendix 4 of this policy fully outlines the duties of the DSL

4.2 Members of Staff/tutors

All members of staff & tutors have a responsibility to:

- Provide a safe environment in which children and vulnerable adults can learn.
- Be prepared to identify children who may benefit from early help.

- Understand the early help process and their role in it.
- Understand Fleet Education Services' safeguarding policy, staff code of conduct and reporting systems.
- Undertake annual and appropriate training which is regularly updated.
- Be aware of the process of making referrals to local authority children's social care and statutory assessment under the Children Act 1989.
- Know what to do if a child or vulnerable adult tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child or vulnerable adult.
- Reassure children or vulnerable adults who report concerns that they are being taken seriously and that they will be supported and kept safe.
- Be able to identify and act upon indicators that children or vulnerable adults are, or at risk of, developing mental health issues.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect so that they can identify cases of children or vulnerable adults who may need help or protection.
- To recognise that indicators of abuse and neglect do not automatically mean a child or vulnerable adult is being abused however all concerns should be taken seriously and referred to the DSL (or deputies) on a case-by-case basis.
- To be aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Indicators of abuse can vary from person to person. Children develop and mature at different rates, so what appears concerning behaviour in a younger child might be normal for an older child.
- To be alert to parental behaviours which can indicate abuse or neglect, so staff will be alert to parent-child/vulnerable adult interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

All staff and tutors should be particularly alert to the potential need for early help for a child or vulnerable adult who:

- is disabled and has specific additional needs
- has special educational needs (regardless of whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child/vulnerable adult, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child.

4.3 Children and vulnerable adults

Children and vulnerable adults (learners) have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- Achieve academic success

- Reach their full potential
- Receive help from a trusted adult
- Learn how to keep themselves safe, including online
- Contribute to the development of safeguarding policies.

4.4 Parents and Carers

Parents/carers have a responsibility to:

- Be aware, understand and adhere the relevant Fleet Education Services policies and procedures.
- Talk to their children or vulnerable adults about safeguarding issues and support Fleet Education Services in their safeguarding approaches.
- Identify behaviours which could indicate that their child or vulnerable adult in their care is at risk of harm including online and seek help and support from Fleet Education Services or other agencies.
- Request a copy of the safeguarding policy which should also be available on Fleet Education Services' website

(See also Appendices 1 & 2)

5.0 Confidentiality & Information Sharing

- Fleet Education Services recognises our duty & powers to hold, use & share relevant information with appropriate agencies in matters relating to the protection of children or vulnerable adults at the earliest opportunity as per statutory guidance outlined within KCSIE 2023
- All staff/ tutors must be aware that they cannot promise confidentiality in situations which might compromise a child or vulnerable adult's safety or wellbeing
- All staff/ tutors must be aware that they cannot promise a child to keep secrets which might compromise the child or vulnerable adult's safety or wellbeing
- Staff should always report safeguarding concerns in line with Fleet's safeguarding policy
- It is generally good practice to share information with consent and where possible, respect the wishes of those who do not consent to having their information shared.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children or vulnerable adults; this may include sharing information with the DSL and with other agencies as appropriate.
- All staff are aware they cannot promise confidentiality in situations which might compromise a child or vulnerable adult's safety or wellbeing
- Safeguarding decisions need to take into consideration the ability for children and vulnerable adults to make informed decisions as per the Mental Capacity Act (2005). If in doubt, staff/tutors must contact the DSL/DDSL to determine the course of action that works in the child / vulnerable adult's best interest.
 - You must always assume a person has capacity unless it is proved otherwise
 - You must take all practicable steps to enable people to make their own decisions
 - You must not assume incapacity simply because someone makes an unwise decision
 - Always act, or decide, for a person without capacity in their

- best interests
- Carefully consider actions to ensure the least restrictive option is taken
- There should be a clear route of escalation where a member of staff feels their safeguarding concern has not been responded to appropriately
- Fleet Education Services has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure our compliance with all matters relating to confidentiality and information sharing requirements.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2023).
- Staff/ tutors/ DSL/DDSL will disclose information about a learner on a 'need to know' basis and will check with DSL/DDSL if unsure.

6.0 Supporting Staff/Tutors

Tutors /staff may experience anxiety, stress of other Issues which may arise from concern for a child or vulnerable adult's welfare support. All staff will receive:

- An induction which will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a child's or vulnerable adult's safety or welfare
- Access to Fleet Education Services' staff code of conduct
- Appropriate supervision and support to ensure, competence to carry out their responsibilities for safeguarding and promoting the welfare of children and vulnerable adults
- Direct support from the DSL in their safeguarding role.
- Regular reviews of their own practice to ensure they improve over time. The DSL will also put staff in touch with outside agencies for professional support if they so wish. such as education support. <https://www.educationsupport.org.uk/>. Staff would be referred to Fleet's HR team who can arrange this support.

7.0 Safer Practices

Safer practice is essential for all staff and tutors working with children/ vulnerable adults. Safer practice affects all aspects of working with children/ vulnerable adults and is everyone's responsibility. Adopting these methods, can prevent unsuitable people from working with children and vulnerable adults and will also provide a framework process to investigate complaints against staff and tutors appropriately. It will ensure all staff and tutors conduct themselves in an appropriate manner. Safer practice should be exercised to minimise the risk to learners and to protect our staff and tutors when they come into contact with children/ vulnerable adults.

- The clear guidelines on safer working practice as outlined in our Code of Conduct (8) and throughout this policy will be adhered to by all staff & tutors (including agency & temporary staff)
- Staff/tutors will be made aware of the company's Acceptable Behaviour policy
- All staff/tutors will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking) and Social Media.

7.1 Staff/tutor Induction & Training

All members of staff have signed to confirm that they have been provided with Part 1 of KCSIE (Sept 2023) which outlines safeguarding information for staff. Those members of staff who do not work directly with children or vulnerable adults will be required to read Annex A (attached). Staff /tutors who work directly with children will read Annex B as a minimum. The Senior Leadership team, DSL & DDSL will read KCSIE 2023 in its entirety

- All members of staff have signed to confirm that they have read and understood the national guidance shared with them.
- As part of the induction process all new staff, tutors (including agency and temporary staff) receive Safeguarding & Child Protection training to ensure they are aware of Fleet Education Services' Safeguarding & Child Protection Policy & Procedure & Online Safety Policy & Procedure, that they have read & understood Part 1 and annex A of KCSIE (Sept 2023), and that they are aware of a range of safeguarding issues including online safety.
- A record of participants ensures they receive annual training. Verification that staff have completed this will be recorded on the organisation's Single Central Record (SCR)
- Fleet Education Services Safeguarding Policy & Procedure is emailed to tutors when they complete registration
- All tutors will receive training which will take place at least annually.
- All staff attend Safeguarding training delivered by the Designated Safeguarding Lead at least once a year which will ensure they are aware of a range of safeguarding issues which will include online safety.
- In addition to specific training, all staff /tutors will receive regular updates to provide them with relevant skills and knowledge to safeguard children and vulnerable adults effectively. Verification that staff have received and read the updates is via email.
- In-Tuition, our termly tutor newsletter, will provide safeguarding updates and information
- Fleet Education Services Safeguarding Policy & Procedure can be accessed via the Tutor Hub area of the Fleet Education Services website
- All staff members (including agency and temporary) will be made aware of the company's expectations regarding safe and professional practice via the Code of Conduct which is outlined in section 8 of this policy
- The DSL will put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, or other similar organisations directly.
- Any member of staff affected by issues arising from concerns for children or vulnerable adults' welfare or safety can seek support from the DSL.
- The DSL will review and report to the Managing Director annually, detailing safeguarding training undertaken by all staff/tutors, reviewed and updated policy and will ensure the register of staff/tutor training has been maintained and is up to date.
- Fleet Education Services nominated lead for the Board of Directors, Dave Burchett, will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

7.2 Allegations /concerns against Staff or Tutors

Fleet Education Services will respond to allegations in line with [Part Four of KCSIE 2023](#). We recognise that it is possible for any member of staff, including tutors, governors, contractors, agency and third-party staff and visitors to behave in a way that:

- indicates they have harmed a child/ vulnerable adult or may have harmed a child/

- vulnerable adult
- means they have committed a criminal offence against or related to a child or vulnerable adult
 - behaved towards a child, children or vulnerable adult in a way that indicates he or she may pose a risk of harm to children/ vulnerable adults; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable adults. Allegations of abuse can be made by children and vulnerable adults, and they can be made by other concerned adults.
- All staff/tutors/parents/carers should feel able to raise concerns about poor or unsafe practice and potential failures in Fleet Education Services' safeguarding regime. The leadership team will take all concerns or allegations received seriously.
 - All allegations against staff and tutors must immediately be brought to the attention of the DSL, who will also inform the Managing Director.
 - In all cases, the Local Authority's Designated Safeguarding Officer (previous LADO) should be notified, either directly by the DSL or by the Deputy DSL confirming with the client that they have made a referral to the DSO. The DSO will agree the course of action to be taken in respect of the child/ vulnerable adult & staff member.
 - Following advice from the DSO, tutor or staff member may be suspended or have his or her working arrangements reviewed, pending the investigation.
 - If an allegation is made against the DSL/DDSL this should be brought to the attention of the Managing Director.
 - If an allegation is made against the Managing Director, the DSL should bring this to the attention of a second Company Director (John Bowman), who will inform the DSO.
 - Support and advice will be available from another senior member of Fleet Education Services' staff, to individuals against whom allegations have been made.
 - All members of staff are made aware of the company's Whistleblowing procedure contained within this policy (7.2). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child/ vulnerable adult at risk.
 - Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding safeguarding failures internally.
 - Staff can call 0808 8005000) or email help@nspcc.org.uk.
 - Fleet Education Services has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff/tutor has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at Fleet Education Services, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the DSO.

Harm Thresholds

- Any concerns or allegations about staff, will be recorded and dealt with appropriately in line with national guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of Fleet Education Services from potential false allegations or misunderstandings.
- The DSL will seek advice regarding harm 'thresholds', from Local Authority Designated Officer (LADO / Designated Safety Officer).
- Concerns that do not meet the 'harm threshold' Fleet Education Services may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations

threshold.

- Where low-level concerns are reported to the LADO, these will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, Fleet Education Services will implement appropriate action.

7.3 DBS Referral

If Fleet Education Services removes an individual (paid worker or unpaid volunteer) from any DBS regulated activity (or would have, had the person not left first) because the person poses a risk of harm to children or vulnerable adults, Fleet Education Services will make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

Suspension should be considered when:

- There is cause to suspect a child or vulnerable adult is at risk of significant harm or
- The allegation warrants investigation by the police or
- The allegation is so serious that it might be grounds for dismissal

Any disciplinary investigation should be carried out once the investigation has been completed.

8.0 Code of Conduct

- The code of conduct outlines the conduct Fleet Education Services expects from all our staff and tutors. This includes members of the board of directors, tutors (including temporary agency and temporary staff) and anyone who is undertaking duties for the organization whether paid or unpaid.
- As part of our approach to safeguarding, Fleet Education Services has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our /code of conduct are constantly lived, monitored and reinforced by all staff (including tutors, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the company's safeguarding regime. The leadership team will take all concerns or allegations received seriously.
- The behaviour code aims to help us protect children and vulnerable adults from abuse and reduce the possibility of unfounded allegations being made.
- Fleet Education Services is responsible for making sure everyone taking part in our services has seen, understood and agreed to follow the code of conduct, and that they understand the consequences of inappropriate behaviour.
- All staff /tutors (incl temporary agency or temporary staff) are expected to adhere to a code of conduct in respect of their contact with learners and their families. Children and vulnerable adults will be treated with respect and dignity.
- Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children/vulnerable adults, staff/tutors are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation.
- Where incidents occur, which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a learner for their own protection or others' safety, this will be appropriately recorded and reported to the DSL and parents.

- Staff/tutors should exercise caution in situations where they are alone with learners, for their own safety and protection. The door to the room in which the 1:1 tuition is taking place should be left open. Where this is not practicable because of the need for confidentiality, another adult will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting.
- Staff/tutors should also be alert to the possible risks that might arise from social contact with children or vulnerable adults outside of the learning environment.
- Home visits or private tuition of children and vulnerable adults should only take place with the knowledge and approval Fleet Education Services.
- Staff/tutors will only use Fleet Education Services digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Managing Director. Staff will only use the approved company email, online learning platform or other company approved communication systems with learners or parents/carers.
- Staff/tutors should be aware of the organisation's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the DSL/DDSL's.
- In order to protect children, vulnerable adults, staff and tutors, we encourage staff and tutors to conduct themselves professionally at all times. This covers appropriate dress, the understanding and adherence to relevant boundaries, social contact outside setting (including on social networking sites), the receiving and giving of gifts and favouritism and the safe use of technology.

You should seek to keep your personal contact with children and vulnerable adults under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions and advice must be heeded when working with children and vulnerable adults:

8.1 Learner /Tutor Relationship

- Never ask a child or vulnerable adult personal questions about their background
- Remain open to any questions or concerns a learner may have about attitudes and behaviours they may not feel comfortable with.
- Act as a positive role model for every child and vulnerable adult you work with.
- Remember that others may misinterpret your actions, no matter how well intentioned.
- Refrain from any physical contact with learners, and ensure that inappropriate subjects are not discussed, or inappropriate banter exchanged.
- Never promise to keep any disclosure secret – you have a duty to report disclosures or any concerns you may have to the DSL.
- Consider whether a vulnerable adult is able to provide informed consent or whether action is needed in their best interests
- Never arrange to meet learners outside of tuition sessions or to give them lifts to and from tuition in your car.
- Refrain from giving out your personal numbers or private email addresses to children and vulnerable adults.
- Never arrange to meet the learner outside of the formal tutoring arrangements.
- Never use social networking sites – or similar technological platforms – to communicate with learners.
- Do not give gifts to, or accept gifts from, children and vulnerable adults you are working with – this could be considered as a bribe or inducement to enter into a relationship, and could give rise to allegations of improper conduct.
- Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an

education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

- DO NOT believe it could not happen to you; it could.

8.2 Use of Force and Restraint

- We acknowledge that tutors must only ever use physical intervention as a last resort, when a child/ vulnerable adult is endangering him/herself or others and, that at all times, it must be the minimal force necessary to prevent injury to another person.
- If it is necessary to use physical action to prevent a child/ vulnerable adult from injury to themselves or others, you should immediately inform the DSL. The DSL will share this information with the relevant local authority Children's Services department and/or the parents/carers of the child or young person.
- Any concerns or allegations that a member of staff or tutor may have acted inappropriately should be immediately referred to the DSL. The DSL, in turn, will contact the DSO.
- We understand that physical intervention of a nature which causes injury or distress to a child or vulnerable adult may be considered under child protection or disciplinary procedures.

8.3 Anti-Bullying

- Fleet Education Services is committed to providing an environment free from all forms of bullying.
- Bullying of any form should be reported to the appropriate line manager. This includes all forms e.g., cyber, racist, homophobic and gender related bullying.
- Tutors are aware that children with SEND and or differences/ perceived differences are more susceptible to being bullied / victims of abuse.

8.4 Online Safety and use of digital technology

Fleet Education Services recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2023. Fleet Education Services has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all staff, tutors and parent/carers and other agencies or members of the wider community, as appropriate (incorporated within this policy and separate Online safety policy).

- The growth of different electronic media in everyday life and an ever-developing variety of devices including PC's, laptops, tablets, mobile and smart phones, webcams etc. place an additional risk on our children and vulnerable adults.
- Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and vulnerable adults with a view to grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.
- Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children. Learners can engage in or be a target of bullying using a range of methods including text and instant messaging to reach their target. Mobile phones are also used to capture

violent assaults of other children for circulation (happy slapping). The best protection is to make pupils aware of the dangers through reference to the Child Exploitation and On-line Protection Centre where appropriate <http://www.ceop.gov.uk/>.

- Abuse on-line can take place wholly online, or technology may be used to facilitate offline abuse.
- Staff/tutors should refer the Fleet's Online Safety policy for further guidance.
- Further guidance on online safety can also be found in Annex D of KCSIE 2023.

8.5 Tuition Setting & Environment

- Tutors should take evidence of their enhanced DBS check and photo ID (such as driving license or passport) with them on their first visit to a new Learner.
- Tutors working in schools and other education settings may be required to allow the establishment they are visiting to retain a copy of their enhanced DBS check and photo ID for the duration of the tuition assignment. This will be recorded on the school's Single Central Record (SCR) and removed at the end of the tutor assignment.
- Always ensure that another adult is present before entering a tuition setting. This could be a teacher, carer, parent or other adult who has responsibility for the welfare of the child/ vulnerable adult. If no other adult is present, you should not enter the premises; explain to the child / vulnerable adult that you cannot come in until such a person is present. Call your Tuition Consultant at Fleet Education Services to inform them of the situation immediately.
- Ensure that you work in a suitable environment, with the door ajar and in earshot of other adults. If you have a concern that the environment is not suitable, you should report this immediately to your Tuition Consultant at Fleet Education Services. If you have a concern that the environment poses a potential risk of harm to a child / vulnerable adult, or to you, you should immediately inform the DSL.
- The tuition area represents a professional working space and therefore should have a table, chair, adequate lighting, and equipment. Distractions such as mobile phones, TV/radio should be switched off. No pets present and no smoking.
- Always dress appropriately for tuition, considering the setting you are working in and with respect to the religious and cultural backgrounds of the people you may come into contact with during tuition.

If using the internet or other technology for the purposes of tuition, always seek the permission of the parent or carer and ensure that all material is age appropriate for children and vulnerable adults and relevant to the purpose of tuition.

8.6 Whistleblowing

Fleet Education Services fosters a culture of openness in line with the "Freedom to speak up" review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children and vulnerable adults or poor practice that may cause a risk to children and vulnerable adults.

- All staff/ tutors should be aware of their duty to raise concerns, where they exist, about the management of child/ vulnerable adult protection, which may include the attitude or actions of colleagues. If an issue arises that they feel needs reporting this should be to their line manager in the first instance and, if this is not appropriate, to the Managing Director.

- Fleet Education Services recognizes that there may be circumstances where staff and learners feel unable to raise concerns or incidents of malpractice within the organization as there is reasonable doubt that these would be dealt with adequately.
- All staff/tutors have a legal duty to raise concerns where they feel individuals are failing to safeguard and promote the welfare of children and vulnerable adults. Where it is not possible to raise concerns within the Fleet Education Services, staff/tutor may report concerns to the following;
 - the Ofsted whistle-blowing line on 0300 123 3155
 - the NSPCC whistleblowing helpline on 0800 028 0285.
- The Managing Director is responsible for ensuring that these numbers are made available to staff, learners, and parents.

9.0 Safer Recruitment

Fleet Education Services recognises safer recruitment practices are an essential part of creating a safe environment for children/ vulnerable adults and will ensure that office staff employed by Fleet Education Services and also tutors who have direct contact through teaching children/ vulnerable adults are suitable to do so and do not pose any kind of risk to children/ vulnerable adults.

Fleet Education Services will follow the Keeping Children Safe in Education (2023) Safer Recruitment processes in education settings (Part 3) as well as guidance from The Disclosure and Barring Service (DBS) For detailed information on how Fleet Education Services applies Safer Recruitment processes to tutors, please refer to Fleet Education Services Vetting and Selection Policy.

Fleet Education Services is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff & tutors who are safe to work with our learners and staff.

9.1 General principles

- The Managing Director and the leadership team are responsible for ensuring that the company follows safe recruitment processes outlined within guidance.
- All staff and tutors are recruited in accordance with Fleet Education Services' safer recruitment policy, and to abide by Data Protection, Confidentiality and Security Policies.
- At least one member of staff in the department responsible for recruitment has undertaken training in Safer Recruitment.
- Fleet Education Services will carry out extensive checks and enquiries on applicants for all positions and directors, in accordance with statutory requirements.
- No staff members, tutors or directors will be allowed to take up posts until all checks and enquires required for that position have been satisfactorily completed.
- Checks with the Disclosure and Barring Service will be carried out at the appropriate level of the candidate's role in the organisation.
- All job advertisements and applications will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.

- The company maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Managing Director will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- We advise all staff to disclose any reason that may affect their suitability to work with children/ vulnerable adults including convictions, cautions, court orders, cautions, reprimands, and warnings.
- We will ensure that all staff and tutors have read the staff code of conduct and understand that their behaviour and practice must be in line with it.
- Newly appointed staff will have initial training in Safeguarding as part of their induction programme and receive a copy of the Fleet Education Services Safeguarding Policy and procedure.
- Newly recruited tutors will be given a copy of Fleet Education Services' Safeguarding Policy and Procedure.

9.2 Checks to be taken out

Fleet Education Services verify the following information for all new staff:

- The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided.
- The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted, and its validity checked.
- Where the applicant will be involved in regulated activity, an enhanced DBS check will be taken out, including information from the barred list. Teaching staff cannot begin work until their enhanced DBS check has been completed.
- In the case of tutors, checks will be made on the applicant's academic and vocational qualifications and further checks made on TRA Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order.
- Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach via the TRA Teacher Services system.
- Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role.
- Online search checks may be made into an applicant to check for suitability in the role and documentation will be held with the applicant's vetting information for audit purposes. Anything of concern found within these searches will be shared with the DSL for further investigation.
- Fleet Education Services will keep copies of the following documents on staff personnel files:
 - Documents used as proof of identity such as passports or driving licences.
 - A summary of the DBS certificate (but all other documents relating to the DBS check must be destroyed).
 - Documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).
 - Online search results.

9.3 References

- Applicants will be asked to provide a full employment history and details of at least 2 referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References from colleagues will not be

acceptable.

- All references will be taken up prior to interview and will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided. References will be taken up from current employers only; if the applicant is not currently employed, verification of will be sought from their previous school/college as to the dates the applicant was employed and the reasons for leaving the post. Any information provided by applicants as part of an application process will be verified with independent sources, and any reference received electronically will be checked to verify the originating source.

9.4 DBS checks

In order to ensure that people who work with children and vulnerable adults are suitable to do so and are not barred from working with children, Fleet Education Services will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

- Full DBS checks which include barred list checks will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:
 - teaching
 - training
 - supervising
 - care
 - guidance and advice
 - driving a vehicle
 - personal or intimate care.
- The activity must be carried out regularly as part of the staff member's day to day responsibilities and the checks will be reasonable in order to safeguard children and vulnerable adults.
- Full DBS checks with barred list checks will also be carried out on all staff /tutors whose work means they have an opportunity for regular contact with children or vulnerable adults.
- Fleet Education Services has robust procedures for day-to-day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.
- Fleet Education Services will ensure that all DBS checks carried out on staff are on the update service or renewed after 3 years of the original DBS disclosure.
- For staff and tutors registered with the DBS Update Service, an update check will be performed every year. Where an update check reveals a change of information, a new enhanced DBS check will be required.
- Where a tutor does not subscribe to the update service, not only should a DBS be carried out prior to employment (as with other personnel and tutors) but this would need to be carried out no later than every three years or before if:
 - there is a break in service of 12 weeks or more,
 - there are concerns raised about an individual's suitability to work with children

10.0 Policy Compliance, Monitoring and Evaluation

- Fleet Education Services will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.
- The policy will be revised following any national or local policy updates, any significant local safeguarding concerns and/or any changes to our procedures.
- All staff (including tutors & temporary staff will be provided with a copy of this policy and Part One and/or Annexe A of KCSIE 2023 as appropriate. It will also be included on the Fleet Education Services website.
- Parents/carers will be provided with the Fleet Education Services' Safeguarding Policy Statement and advised that the full Policy is available on our website (www.fleeteducationservices.com) or on request.
- The Designated Safeguarding Lead and Managing Director will ensure regular reporting on safeguarding activity and systems to the board of directors, but they will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

11.0 Record Keeping

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing using Fleet Education Services Safeguarding Incident Report Form and passed without delay to the DSL using the Safeguarding@fleeteducationservices.com mailbox. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- Records will be completed as soon as possible after the incident/event, using the child's/ vulnerable adults' words and will be signed and dated by the member of staff/tutor. ~~Child~~Child/ vulnerable adult protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- If there is an immediate concern the member of staff should consult with a DSL before completing the form as reporting urgent concerns takes priority.
- Safeguarding records are kept for individual children/ vulnerable adults and are maintained separately from all other records relating to the child/ vulnerable adult in the company's dedicated 'safeguarding folder' on our shared drive (only accessible to DSL/DDSL's).
- Child/ vulnerable adult protection records will be kept confidential and stored securely. Child/ vulnerable adult protection records are kept in accordance with data protection legislation and are retained centrally and securely.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's/ vulnerable adult's subsequent school/college, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- In addition to the safeguarding file, the DSL will also consider if it would be appropriate to share any information with the DSL at the educational establishment that the child or vulnerable adult is attending
- Where Fleet Education Services receives child protection files, the DSL will ensure key staff will be made aware of relevant information as required.

12.0 Multi-Agency Working

- Fleet Education Services recognises and is committed to its responsibility to work within Local authority multi-agency safeguarding arrangements. The leadership team

and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.

- The company recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's/ vulnerable adult's welfare and protect them from harm. This may include participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Child in Need meetings or other multi-agency meetings.

13.0 Safeguarding Children with Special Educational Needs and Disabilities

- Fleet Education Services acknowledges that children or vulnerable adults with special educational needs (SEND) or with certain health conditions can face additional safeguarding challenges and barriers as they may have an impaired capacity to resist, recognise or avoid abuse or neglect.
- We recognise that children or vulnerable adults with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children or vulnerable adults with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- The DSL will work closely with other agencies & SENDCo's to plan support as required.
- Members of staff/tutors will be encouraged to be aware that children or vulnerable adults with SEND can be disproportionately impacted by safeguarding concerns, such as bullying and exploitation, peer group isolation or bullying including prejudice-based bullying.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's/ vulnerable adult's disability and be aware that children or vulnerable adults with SEND may not always outwardly display indicators of abuse. They will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

14.0 Safeguarding vulnerable groups

Fleet Education Services is aware that some learners may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, CSSW or other agencies in order to overcome problems or keep them safe.

14.1 Children or vulnerable adults who have a social worker

- Fleet Education Services recognises that children or vulnerable adults who are receiving a social work service from CSSW and who are subject to child in need or protection plans are likely to have experienced abuse, neglect and trauma and that this could have a negative effect on their behaviour and learning.

Fleet Education Services will work in partnership with social workers to implement the relevant plan in order to support their education and safeguard and promote their welfare. A representative of Fleet Education Services who knows the young person well, will become part of the professional network and will share information about safeguarding risks and attend planning meetings. In their absence, a suitable colleague will deputise for the member of staff,

or a written report will be provided for meetings.

14.2 Looked after children (LAC)

- Fleet Education Services recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

15.0. Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff/tutors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- Fleet Education Services will not accept the behaviour of any individual (parent or other) that threatens Fleet Education Services' security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the company's services.

Policy Approved by:

Dave Burchett
Managing
Director

Date:

27th September 2023

Appendix 1 Recognising signs of abuse and neglect

All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2023. Fleet Education Services recognises that when assessing whether a child or vulnerable adult may be suffering actual or potential significant harm there are four categories of abuse: Physical, Sexual, Emotional abuse & Neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputy).

All members of staff are aware of and are expected to use the following approach if they are concerned about a child or vulnerable adult. In all cases staff should seek advice from the DSL if unsure.

- 1 Be alert
- 2 Question Behaviours
- 3 Ask for Help
- 4 Refer

Abuse and neglect

- All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children or vulnerable adults who may be in need of help or protection.
- All staff/tutors should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children or vulnerable adults outside of these environments.
- All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children or vulnerable adults can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse and serious youth violence & county lines.
- Children or vulnerable adults may report abuse happening to themselves, other children or vulnerable adults or their family members. All reports made to staff will be taken seriously and will be responded to in line with this policy.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children and vulnerable adults are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children and vulnerable adults can also abuse other children or vulnerable adults online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children and vulnerable adults of all forms of domestic abuse.

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect

Signs of Abuse in Children and vulnerable adults:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Appear to be frightened of the parent/carer
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression

Risk Indicators

The factors described in this section are frequently found in cases of abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague.
- The child may act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

A1.1 Recognising Physical Abuse

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

A1.2 Recognising Emotional/psychological abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

Emotional abuse

- Persistent emotional maltreatment such as to cause severe and adverse effects on the child or vulnerable adult's emotional development.
- It may involve conveying to a child or vulnerable adult that they're worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving the child or vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children or vulnerable adults. These may include interactions that are beyond a learner's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child or vulnerable adult from participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another.
- It may involve serious bullying (including cyberbullying), causing children or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children.
- Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parent/carer being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

A1.3 Recognising Sexual Abuse

Sexual abuse:

- Involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/ vulnerable adult 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.

- They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or vulnerable adults to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.
- Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- The sexual abuse of children by other children is a specific safeguarding issue in education

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and education performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g., anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

A1.4 Recognising Neglect

- The persistent failure to meet a child or vulnerable adult'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, for example, 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 or vulnerable adult from physical and emotional harm or danger.
- The failure to provide adequate supervision (including the use of inadequate caregivers).
- The failure to provide access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child or vulnerable adult's basic emotional needs.

Signs that MAY INDICATE Neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems

- Poor relationship with other children
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2 Specific Types of Abuse

Members of staff /tutors will also be alerted to following specific safeguarding issues:

A2.1 Mental Health

- Staff/tutors are aware that mental health problems can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.
- Where children or vulnerable adults have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these experiences can impact on their mental health, behaviour and education. Staff/tutors are well placed to observe learners day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child or vulnerable adult that is also a safeguarding concern, this will immediately be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.
- Staff/Tutors are aware that children and vulnerable adults are not necessarily in a position to provide informed consent regarding the use of their information or for the management of matters related to safeguarding. In most cases this must be referred to professionals (such as social workers) and parent carers unless it is believed the child or vulnerable adult will be placed in creased risk OR if it is in the public interest in order to prevent a crime or protect others from crime.

A2.2 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Fleet Education Services recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education.

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL

CSE Child Sexual Exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non-consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

A2.4 Nude and/or Semi-Nude Image Sharing by Children / 'Sexting'

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

Fleet Education Services recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

The UK Council for Child Internet Safety ([UKCIS](#)) [sharing nudes and semi-nudes: advice for education settings](#), outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working with all age groups, not just older learners.

[Appendix 3 provides specific procedures for reporting any concerns](#)

A2.5 Serious violence/gangs

All staff will be made aware of indicators, which may signal that children or vulnerable adults are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions. This could also indicate that children or vulnerable adults have been approached by, or are involved with, individuals associated with criminal networks or gangs.

We are also aware that fear and a need for self-protection is a key motivation for children to

carry a weapon it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff/tutors will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#).

- Any concerns regarding serious violence will be reported and responded to in line with other child or vulnerable adult protection concerns.
- The initial response to child or vulnerable adult victims is important and staff will take any allegations seriously and work in ways that support children and vulnerable adults and keep them safe.

A2.6 County lines

Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and vulnerable adults to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation can affect any child or young person (male or female) under the age of 18 years; can still be exploitation even if the activity appears consensual; can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence; can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

A2.7 Child-on-child abuse/Up-skirting

All staff & tutors at Fleet Education Services recognise that children are capable of abusing other children, and that it can happen both inside/outside of school as well as online.

Child-on-child abuse can take different forms, including but not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- abuse in intimate personal relationships between children
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- 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

- upskirting (which is a criminal offence), 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.

Fleet Education Services believes that abuse is abuse and it will never be tolerated or dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Fleet Education Services recognises that even if there are no reported cases of Child-on-child abuse, such abuse is still likely to be taking place.

All staff have a role to play in challenging inappropriate behaviours between children and recognise that that some Child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, i.e., for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

Fleet Education Services want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of Child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Alleged victims, perpetrators and any other child affected by Child-on-child abuse will be supported. All reports will be taken seriously, victim blaming will be avoided. Fleet Education Services will work with parents/carers by signposting them to appropriate sources of help. Where necessary by informing the police.

A2.8 Sexual violence and sexual harassment between children

- When responding to concerns relating to child on child sexual violence or harassment, Fleet Education Services will follow the guidance outlined in Part Five of KCSIE 2023 and the DfE [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#) guidance.
- Fleet Education Services recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff

determine how best to build trusted relationships with children and young people which facilitate communication

- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case. The DSL will seek further advice from Children's Services and/or the Police to explore next steps & how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted) The risk and needs assessment will be recorded and kept under review.
- Reports will initially be managed internally and where necessary will be referred to Children's Services and/or the Police.
- The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult learners or staff, and, any other related issues or wider context.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Children's Services or the Police.

A2.9 Domestic abuse

Domestic violence and abuse are any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff/tutors have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. Fleet Education staff are aware of Operation Compass, a national initiative that helps safeguard children and young people who may have been exposed to domestic abuse.

A2.10/11 So-called 'Honour-Based' Abuse (HBA) Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for

sexual exploitation; prostitution. If members of staff/tutors have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff/tutors have a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

A2.12 Female Genital Mutilation (FGM)

- FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.
- FGM is a deeply embedded social norm, practiced by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.
- FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.
- FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.
- FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM

A new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report ‘known’ cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out ‘teaching work’, whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children’s homes in England.

The duty does not apply in relation to suspected cases – it is limited to ‘known’ cases’ (i.e., those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be examining pupils or learners. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document “[Mandatory Reporting of Female Genital Mutilation – procedural information](#)”. A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. Tutors will personally report to the police cases where they discover that an act of FGM appears to have been carried out. They will still discuss any such case with DSL with a view to involving appropriate agencies.

A2.13 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit’s [statutory guidance](#) and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

A2.14 Child Trafficking and Modern Slavery

Child trafficking and modern slavery are abuse. Many children, young people and vulnerable adults are trafficked into the UK from other countries like Vietnam, Albania and Romania. Children and vulnerable adults are also trafficked around the UK. It can be difficult to know what you can do if you're worried about a child or vulnerable adult. Further information can be found on the NSPCC website <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-trafficking/>

A2.15 Preventing Radicalisation -The PREVENT Duty -

- Fleet Education Services is aware of our duty under Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have (“the Prevent duty”) and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from

extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

- Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:
- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.
- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.
- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g., IT skills, knowledge of chemicals, military training or survival skills).
- The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.
- Protecting children from the risk of radicalisation is just an additional part of our wider safeguarding duties and is similar in nature to protecting children from any other harms e.g., drugs, gangs, neglect, sexual exploitation, whether these come from within the family or are the product of outside influences. The Prevent duty covers all forms of radicalisation and extremist views and is NOT solely limited to ISIL but includes all organisations who may seek to influence a child or young person e.g.: Paramilitary organisations. E.g.: IRA, UDF, and radical organisations promoting extremist views such as far right-wing activists, animal rights activists, eco-terrorists.

It is important to emphasise that the Prevent duty is not intended to stop children and young people debating controversial issues if that is part of the curriculum delivery or arises naturally as part of the tuition programme. On the contrary, tuition which touches on such subjects e.g., English literature, history, politics, ethics etc., should provide a safe place in which children and young people can learn and understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist views and arguments under the guidance of a professional tutor.

Fleet Education Services recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Staff will report any concerns to the DSL.

A2.16 Channel

Is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to the local Multi Agency Safeguarding Hub ([MASH](#)). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

A2.17 Cybercrime

- Fleet Education Services recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

A2.18 Children Missing from Education

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.
- Any concerns that a child is missing from education, we will report to the school or Local Authority in-line with our local policies.

A2.19 Institutional / organisational

Institutional abuse is when an institution – e.g. company, agency, charity, or organisation – makes it unnecessarily and purposefully difficult for a person to access services they need.

It refers primarily to institutions that care for children/vulnerable adults and can mean that the routines or systems in place mean that care is sub-standard or there are poor practices and behaviours from the staff. It can also be that the institution deprives the child/adult of their rights and their dignity which violates their well-being.

This type of abuse can often be identified when a person who is cared for by an institution lacks personal belongings and doesn't have a care plan. If they regularly get admitted to hospital or are treated badly by staff, this is also institutional abuse and concerns should be reported.

A2.20 Financial or material

Financial abuse is when a person has their access to money controlled. It can cover how a person is able to obtain money or how they get and use the money that they already have.

Manipulating someone's money comes in many guises.

Financial abuse can be:

- Forcing someone to work for money that is already theirs
- Restricting or removing access to someone's government benefits.
- Demanding that a will or inheritance arrangement are changed to include the abuser.
- Accessing benefits on behalf of the vulnerable adult.
- It is possible that a vulnerable person may need help and support with their finances. Having someone help them manage their bank accounts or benefits claims in itself isn't abuse – However, the person using their position to their advantage is.

An abuser might only allow the person to use their bank card when they're present, or claim the person is less capable than they are to increase government benefits. Living with a person rent-free without informed consent from the vulnerable adult is another subtle type of financial abuse.

You'd notice a person was suffering from financial abuse when they lacked money even when you knew they had income, having problems paying their bills, loss of confidence in their ability to look after their finances, or being unusually protective of their purse, wallet, or belongings.

A2.21 Discriminatory

Discriminatory abuse means a person is being denied the right treatment due to protected characteristics. Protected characteristics under UK law are:

- Gender.
- Sex.
- Race.
- Age.

- Disability.
- Religion or belief.
- Sexual orientation.
- Gender reassignment.
- Marital or civil partnership status.

If a person isn't being given the care or access to services based on any of these characteristics, they may be a victim of discriminatory abuse. Whenever a child or vulnerable adult comes into contact with services, these issues need to form part of assessments and care plans.

Examples of abuse due to discrimination can include not offering a care plan in Braille to a blind person, forcing a person to attend meetings when their religion expects them to be praying, or showing a movie that depicts harassment of a homosexual character.

A victim of this abuse may seem withdrawn and not keen on engaging with the services in place for them. Abuse may also be identified by looking at a care plan and understanding how it isn't suitable for that person.

Appendix 3 - Safeguarding & Child/vulnerable adult Protection Procedures

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff/tutor should speak to the Managing Director. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.

You may have a concern about a child / vulnerable adult's well-being based on:

- Something the child or vulnerable adult has told you
- Something that you have noticed about the child or vulnerable adult's behaviour, health or appearance
- Something another professional or adult (e.g., parent or carer) said or did
- Something written or drawn as part of the learners' work

Even if you think your concern is minor, the DSL or local authority may have more information that, together with what you know, represents a more serious worry about the child or vulnerable adult.

It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small.

A3.1 Responding to a Concern (what you must do when you suspect a child /vulnerable adult may be at risk)

1. Let the child or vulnerable adult know what you plan to do next

If staff/tutors are made aware of a child/vulnerable adult protection concern, they are expected to follow this procedure.

- Do not promise to keep what you have been told a secret. Concerns will have to be shared with DSL or another agency.
- Listen carefully to the disclosure and be non-judgmental.
- Only use open questions to clarify information where necessary, e.g., who, what, where, when or Tell, Explain, Describe (TED).
- Be clear about boundaries and how the report will be progressed.
- Record the concern in line with Fleet Education Services on the Incident Report form
- Inform the DSL (or deputy), as soon as practically possible

Examples You could say:

- I am worried about your bruise, and I need to tell somebody else who can help us think about how to keep you safe
- I am worried about you; I think it's best if I talk with my Fleet Education Services' manager who will be able to help us decide what's for the best
- If someone is hurting you or that you are going to hurt someone else, then it's important that I share this with my Fleet Education Services' manager who can help make a good choice about what to do

Inform Fleet Education Services' DSL or DDSL immediately. If neither is available, you should ask to speak the Managing Director at Fleet Education Services.

Tutors working on school premises must follow their policy and in the 1st instance must notify their DSL.

2. Make a written record

Complete the Safeguarding Incident report form as soon as possible after the event noting

...

- Name of child or vulnerable adult.
- Date, time and place.
- Who else was present.
- What was said/ What happened/ What you noticed. Include in your record speech, behaviour, mood, drawings, games or appearance.
- If the child /vulnerable adult spoke, record their words rather than your interpretation.
- Analysis of what you observed and why it is a cause for concern.
- The written record must be factual not your opinion.
- The report must be emailed immediately to safeguarding@fleeteducationservices.com.
- If you have any concerns or unsure about any part of this, please telephone your DSL/DDSL for guidance.
- You must not discuss or share this with anyone else.

A3.2 Action to be taken by DSL

The DSL shares information with other relevant professionals, including the local authority children's services department and/or the DSO formerly LADO, recording their reasons for sharing information and ensuring that they are aware of what action the other professional will take as a result of information shared. The DSL must:

- Create a child /vulnerable adult protection log for each individual case and ensure this is stored securely away from other records held on the child or vulnerable adult and updated regularly with any relevant progress
- Provide to the relevant authority any report or record of disclosure provided by the tutor or member of staff
- Work closely and collaboratively with all professionals involved in the investigation to keep the child / vulnerable adult safe.
- Attend a child protection conference when invited and provide updated information about the child/ vulnerable adult/ staff member or tutor.
- Inform a tutor or staff member when their presence is required at a child /vulnerable adult protection conference
- Attend any subsequent child /vulnerable adult protection review conferences
- Ensure the Managing Director is briefed throughout any Child /vulnerable adult Protection investigation.
- Only share information with other Senior Managers when there is a clear need for them to be informed, and with consideration of confidentiality for the child or vulnerable adult involved.

A3.3 Reporting the Sharing of nudes & semi-nudes imagery

Report immediately to Designated Safeguarding Lead (DSL) or equivalent as outlined in the policy.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child/ vulnerable adult to share or download – this is illegal.
- If you have accidentally already viewed the imagery (e.g., if a young person/ vulnerable adult has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person/ vulnerable adult to delete it.
- Do not ask the child/children or vulnerable adult(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident with other members of staff, the young person(s)/ vulnerable adult it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people/ vulnerable adults involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

A3.4 Action to be taken by DSL

DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child/ vulnerable adult involved. This may mean speaking with relevant staff and the children /vulnerable adult involved as appropriate.
- parents and carers will be informed at an early stage and be involved in the process to best support children /vulnerable adults, unless there is good reason to believe that involving them would put a child /vulnerable adult at risk of harm.
- all decisions and action taken will be recorded in line with our safeguarding procedures.
- a referral will be made to ICS and/or the police immediately if:
 - ❖ the incident involves an adult (over 18).
 - ❖ there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child /vulnerable adult or they have special educational needs.
 - ❖ the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage or are violent.
 - ❖ a child /vulnerable adult is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date. If they are unsure how to proceed, advice will be sought from the ICS or The Police

A3.5 Disclosure

It is important that all staff and tutors are aware of the following points when a disclosure is

made to them by a child or vulnerable adult, or about a child or vulnerable adult either from another child or vulnerable adult, or another adult:

- Never guarantee absolute confidentiality as Child/vulnerable adult Protection will always have precedence over any other issues
- Listen to the child or vulnerable adult, rather than question them directly
- Offer him / her reassurance without making promises, and take what the child or vulnerable adult says seriously
- Allow the child or vulnerable adult to speak without interruption
- Accept what is said – it is not your role to investigate or ask probing questions
- Do not overreact – remain calm no matter what the child or vulnerable adult is disclosing to you
- Alleviate feelings of guilt and isolation, while passing no judgement
- Advise that you will try to offer support, but that you must pass the information on
- Explain what you have to do and whom you have to tell
- Record the discussion accurately, as soon as possible after the event
- Use the child or vulnerable adult's words or explanations – do not translate into your own words, in case you have misconstrued what the child or vulnerable adult was trying to say
- Contact Fleet Education Services' DSL for advice and guidance

REFER do not INVESTIGATE

USEFUL RESOURCES AND WEBSITES

Practitioners who work with children and vulnerable adult may find the following resources useful.

- [Working Together to Safeguard Children \(2018\)](#)
- [Keeping Children Safe in Education \(2023\)](#)
- What to do if you're worried a child is being abused Advice for practitioners
- [Safeguarding Vulnerable Groups Act \(2006\)](#)
- [Children Act 1989](#);
- Every Child Matters 2004
- The Childcare Act 2006
- The Counterterrorism and Security Act 2015
- The Children and Social Care Act 2017
- [Children Act 2004](#);
- [Education Act 2011](#)
- [Mental Capacity Act 2005](#)

Useful websites for practitioners who work with children and young people.

- Department for Education:
<https://www.gov.uk/government/organisations/department-for-education>
- NSPCC: <http://www.nspcc.org.uk/>
- CEOP (Online Safety) <http://ceop.police.uk/>
- Safe Networks (NSPCC): <http://www.safenetwork.org.uk/Pages/default.aspx>

SAFEGUARDING CONCERN FORM

Please complete this form answering as much as possible

Name of referrer: Role:		
Your contact phone numbers		
Email address:		
Who does the concern refer to? Learner, tutor, staff, other	Name:	
Date of Birth/age		
Address (if known):		
Name of parent/carer (If known)		
Contact details:		
Name of School: (If applicable)		
Was anyone else present? Contact details		
<p>Describe what has happened, and what has concerned you. Include as much detail as possible. Please keep this factual and free from personal opinion</p> <ul style="list-style-type: none"> • What have you observed? • What you have been told? (And by whom) • When? (Times and dates) • What do you consider the risk to be? • How did you respond to the disclosure? What did you say & to whom? 		

To your knowledge, is anyone else aware of your concern? If so, whom?
Is the parent/carer aware that you have raised this issue?

Please email to: safeguarding@fleeteducationservices.com

Designated Safeguarding Lead:

Linda Chapman: 07946 673351 / linda.chapman@fleeteducationservices.com

Deputy Designated Safeguarding Lead team:

Lydia Stannard: 01252 386023 / lydia.stannard@fleeteducationservices.com

Ruth Brace: 01252 386019 / ruth.brace@fleeteducationservices.com

Lindsay Sutheran: 01252 386048 / lindsay.sutheran@fleeteducationservices.com

Managing Director – Fleet Education Services – Dave Burchett – 07938 600672

Appendix 4. - Designated Safeguarding Lead

A4.1 List of duties

- Drawing up and enforcing the company's safeguarding policy.
- Being alert to and recognising welfare issues, being sure to challenge poor practice.
- Sharing appropriate information with relevant people.
- Gathering any other relevant information and evidence.
- Consulting local safeguarding children board procedures for additional information and guidance if needed.
- Making referrals to social services when appropriate.
- Continue working with the family, sharing information and contributing to plans if the concern is investigated.
- Ensuring that all staff having contact with children, vulnerable adults and/or their families have received appropriate training on safeguarding issues.
- Being the first point-of-call for all staff who have safeguarding concerns.
- Take part in safeguarding children training every 2 years and have ready access to relevant resources.
- Ensure that there is an effective child/ vulnerable adult safeguarding protection policy and staff code of conduct in place. Copies of these should be provided to all staff members and also be available for the public and parents to view.
- Ensure that the child /vulnerable adult protection policies are reviewed annually and updated where necessary.
- Act as a source of support, advice and expertise to staff members and help them to understand when it's essential to report their concerns.
- Keep detailed, accurate and secure written records of concerns and referrals.
- Have knowledge of how local authorities conduct a child/vulnerable adult protection case conference and a child/vulnerable adult protection review conference, plus be able to attend and contribute to these effectively when required to do so.
- Work closely with the local authority and other relevant agencies.
- Decide whether to make a referral to local authority social care when a concern has been made.

It is essential that the Designated Safeguarding Lead is given the time, funding, training, resources and support to perform these responsibilities successfully. This person has an important job to undertake, and they must be able to do it as best as they can, without hindrance.

A4.2. DSL Procedure

- Take any allegation/concern seriously
- Conduct an investigation through interviews/written statements – all information received must be recorded ACCURATELY
- Securely record and file ALL allegations including
 - Date/time/person against/victim/location/information source
 - Action taken – date/time/by whom
- Make an assessment regarding escalation to DSOs at local authority
- Record actions if no escalation to include reason and

recommendations? Close/review/date/time/closing, reviewing officer

- If escalated to DSO
 - Contact LA by phone to establish DSO details
 - Email details of concern to DSO
 - Date/time/person against/victim/location/information source
 - Await further instruction from DSO
 - Follow up any actions as necessary
 - Hand over case to DSO– date/time/DSO details
 - Close case – file ALL communications securely

****Note:** if alleged victim is deemed under immediate threat call 999 IMMEDIATELY