



## **Child Protection and Adults at Risk Safeguarding Policy**

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### **Our Commitment**

At SEND4, we hold the safeguarding and protection of all members in the highest regard, placing it at the forefront of our operations and considering it a collective responsibility within our organisation.

As a dedicated entity, we are resolute in our commitment to creating an environment within SEND4 that is secure, nurturing, and empathetic for those we serve.

This encompasses equipping our staff with the ability to identify signs of distress and abuse; while also ensuring their familiarity with the protocols we have established to address any safeguarding concerns. We acknowledge this as a crucial skill and obligation, given our role as an entrusted organisation responsible for the well-being of individuals, working in collaboration with their primary caregivers and other relevant agencies.



## **This Document**

- Defines the role and responsibilities of individuals in the organisation
- Applies to all people who work for and with SEND4, including our staff, stakeholders, volunteers/work experience, and contractors
- Supports our aims as an organisation
- Is based on current legislation, government guidance and best practice. These documents are referenced at the end of this policy
- Contains the relevant contact details at the end of this policy

## **Obligations**

At SEND4, we are firmly committed to upholding the rights of our member to protection, regardless of factors such as age, gender, sexual orientation, religion, belief, first language, race, culture, health, or disability. Ensuring a safe environment for our members is paramount and is the shared responsibility of everyone within our organization.

Our primary goal is to cultivate a secure, nurturing, and supportive atmosphere at SEND4. To this end, we recognise our statutory duty to safeguard members, and we are dedicated to fulfilling our legal and statutory obligations effectively.

Aligned with this commitment, our policies are meticulously designed and consistently monitored to reflect our dedication to creating an environment where members both feel and are safe at all times.

This policy is built upon the procedures outlined by the Pan-Dorset Safeguarding Children Partnership (PDSCP) and national statutory guidance, 'Working Together to Safeguard Children' (updated July 2018), and 'Keeping Children Safe in Education' (updated September 2025).

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

'Working Together to Safeguard Children,' the HM Government statutory guidance, defines safeguarding as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best life outcomes.

Moreover, this policy ensures that every staff member at SEND4 is well-informed about the established procedures and necessary actions to safeguard members and respond appropriately to safeguarding and child protection concerns.

The objectives of this policy are:

- Prioritising child protection and members safety within SEND4.
- Enhancing staff awareness and identifying responsibilities in reporting concerns related to members social, emotional, physical, or academic well-being (see anti-bullying policy, behaviour policy, and health and safety policy).
- Fostering effective communication among all staff when addressing potential safeguarding or child protection issues, while maintaining confidentiality, respect, and trust.
- Clearly outlining the correct procedures for individuals encountering safeguarding or child protection issues and ensuring that all staff members receive up-to-date training.
- Ensuring compliance with our statutory obligations to safeguard members.

Note: For the purpose of this policy, "staff" refers to any member of staff, whether permanent or part-time, paid, or unpaid, contracted, visiting, or invited into the SEND4 community in any capacity where they will be in contact with members.

The DSL is Penny Bailey In the absence of the DSL, child protection and safeguarding matters will be dealt with by the deputy DSL, Lucia Sanchis, Tracy Perren or Bev Gowman

## Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
ASC	Adult Social Care	The branch of the local authority that deals with adult's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in education.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships, and wider skills in England.
DPO	Data protection officer	The appointed person in an organisation with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the provision.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for members who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the member, for as long as it is required.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.

FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	‘Honour-based’ abuse	So-called ‘honour-based’ abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges’ duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC/CIC	Looked-after children/Child in care	Children who have been placed in local authority care or where children’s services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs’ Council	The National Police Chiefs’ Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.

PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which members learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all members. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers/work experience who attend SEND4 in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to members with special educational needs.
SMT	Senior Management Team	Staff members who have been delegated leadership responsibilities in a college.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

## Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18. However, SEND4 have members over 18, we will safeguard adults at risk by ensuring that our activities are delivered in a way which keeps all adults safe.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

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

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of college. Sexual harassment is likely to violate a member's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.



- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, “**upskirting**” refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including members and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the “**consensual and non-consensual sharing of nude and semi-nude images and/or videos**”, colloquially known as “**sexting**”, and collectively called “**youth-produced sexual imagery**” is defined as the creation of sexually explicit content by a person under the age of 18 that is shared with another person under the age of 18. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

“**Deep fakes**” and “**deep nudes**” refer to digitally manipulated and AI-generated nudes and semi-nudes.

For the purposes of this policy, “**indecent imagery**” is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Indecent images also include indecent “**pseudo-images**,” which are images have been created or manipulated using computer software and/or AI.

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.



For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child 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 the child to frequently 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, but it may also occur alone.

For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

### **For members over 18 (Adults at Risk)**

In order to implement this policy for those aged 18 and over SEND4 will ensure that:

- Everyone involved with SEND4 is aware of the safeguarding adult procedures and knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of an adult.
- Any concern that an adult is not safe is taken seriously, responded to promptly, and followed up in line with SEND4 the Policy and Procedures.
- The well-being of those at risk of harm will be put first and the adult actively supported to communicate their views and the outcomes they want to achieve. Those

views and wishes will be respected and supported unless there are overriding reasons not to.

- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.

There is a legal duty on Local Authorities to provide support to 'adults at risk.'

- Adults at risk are defined in legislation.
- The safeguarding legislation applies to all forms of abuse that harm a person's well-being.
- The law provides a framework for good practice in safeguarding that makes the overall well-being of the adult at risk a priority of any intervention.
- The law in England emphasises the importance of person-centred safeguarding, referred to as 'Making Safeguarding Personal.'
- The law provides a framework for making decisions on behalf of adults who cannot make decisions for themselves (Mental Capacity).
- The law provides a framework for all organisations to share information and cooperate to protect adults at risk.

Six core principles of keeping Adults Safe and examples of checklist for the adult involved

1. **Empowerment:** People being supported and encouraged to make their own decisions and informed consent. E.g. *"I am asked what I want as the outcome from the safeguarding process, and these directly inform what happens"*
2. **Prevention:** It is better to take action before harm occurs. E.g. *"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."*
3. **Proportionality:** The least intrusive response appropriate to the risk presented. E.g. *"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."*
4. **Protection:** Support and representation for those in greatest need. E.g. *"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."*
5. **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. E.g. *"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professional will work together and with me to get the best results for me."*
6. **Accountability:** Accountability and transparency in delivering safeguarding. E.g. *"I understand the role of everyone involved in my life and so do they."*

## 1. Legal Framework

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

### Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004

- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- The Care Act 2014 Care and Support Statutory Guidance (especially chapter 14) 2014
- The Human Rights Act 1998
- General Data Protection Regulations 2018

## **Statutory Guidance**

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2024) 'Keeping children safe in education 2024'
- DfE (2025) 'Keeping children safe in education 2025'
- HM Government (2020) 'multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'

## **Non-Statutory Guidance**

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2025) 'Filtering and monitoring standards for schools and colleges'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'



This policy operates in conjunction with the following policies and documents:

- Missing Members Policy
- Prevent Duty Policy
- Anti-bullying Policy
- Behaviour and Exclusion Policy
- Online Safety Policy
- Data Protection Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Staff Disqualification Declaration Form

## **2. Roles and Responsibilities**

### **Roles & Responsibilities**

The Directors will operate in accordance with Section 175 / Section 157 of the Education Act 2002 and the accompanying statutory guidance 'Keeping Children Safe in Education' (September 2025) to safeguard and promote the well-being of members at SEND4.

The Directors bear the responsibility of ensuring that SEND4 fulfils its statutory obligations for safeguarding, with all policies and procedures in place and effective.

According to the Dorset Safeguarding Standard (recommended by the Pan-Dorset Safeguarding Children Partnership), Directors will receive an annual report from the Designated Safeguarding Lead for monitoring compliance with statutory responsibilities. This report will be reviewed at the Directors to assess the efficacy of mandatory policies, procedures, and training.

The Directors will ensure that all individuals involved in provision receive appropriate safeguarding and child protection training, including online training, upon induction. This training will empower them with knowledge to provide strategic input and ensure that safeguarding policies and procedures are effective in supporting a robust approach to safeguarding. Their training will be regularly updated.

The Directors are conscious of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements.

The Dorset Standards also necessitate that schools and colleges submit an annual audit of their safeguarding and child protection arrangements, along with an action plan, to the Safeguarding Children Board.

All adults at SEND4 hold the duty to safeguard and promote members welfare by taking appropriate action, particularly in cases involving child protection concerns.

The Directors are accountable for maintaining an effective Safeguarding Policy at SEND4, reviewed at least annually and accessible to the public on our website.



Designated Safeguarding Leads and deputy DSLs, along with other key staff members, must complete accredited training every two years. All staff, regardless of their role, will receive basic training upon appointment and subsequently online or in-house training within a 12-month period. Additionally, annual updates will be provided to keep all staff members current on the latest information and guidance.

Staff members are obliged to immediately report any concerns regarding the health, safety, or well-being of a member at SEND4 to the DSLs. These concerns may be either firsthand or second hand. While the initial concern may be reported in person or by phone, it must be provided to the DSL in written form using the portal. A determination will then be made regarding the most suitable course of action.

Everyone is expected to adhere to the guidelines outlined in this policy and the Code of conduct issued to all staff, especially in cases where a member discloses abuse. Abuse can manifest as sexual, emotional, physical, or discriminatory actions. It can also be linked to neglect or cultural, faith, and belief factors. Even in the absence of a disclosure, staff should recognize the signs and symptoms and refer any concerns to the DSL to establish a suitable course of action. Any staff member is authorised to make a referral directly to children's social care or to adult social Care.

It is crucial to remember that DPA and UK GDPR do not prohibit information sharing for the purpose of safeguarding children and promoting their welfare. In cases of uncertainty about sharing information, staff members should consult with the designated safeguarding lead or a deputy. Concerns about sharing information should not impede the imperative of safeguarding and promoting children's welfare.

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the member.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which members can learn.
- Be prepared to identify members who may benefit from early help.
- Be aware of SEND4 systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection, adults at risk and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process for children and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS or ASC and/or the police immediately, if at any point there is a risk of immediate serious harm to a child or member.
- Support social workers in making decisions about individual children or adults at risk, in collaboration with the DSL.

- Be aware of and understand the procedure to follow in the event that a child or an adult at risk confides they are being abused, exploited or neglected.
- Be aware that a member may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all members feel listened to and understood.
- Empower members and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put members at risk of harm.
- Be aware of behaviours that could potentially be a sign that a member may be at risk of harm.

Teaching including the Managing Director, have a responsibility to:

- Safeguard members' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards.'
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The Directors have a duty to:

- Take strategic leadership responsibility for the SEND4 safeguarding arrangements.
- Ensure that SEND4 comply with its duties under the above child/adult protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in SEND4 are effective and comply with the law at all times.
- Guarantee that SEND4 contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Confirm that SEND4 safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the SEND4's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children and adults read at least Part one of KCSIE and Making Safeguarding Personal.
- Ensure that staff who do not work directly with children and adults read either Part one or Annex A of KCSIE and Making Safeguarding Personal.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children or adults at risk.



- Ensure the Managing Director takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SMT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-college approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's/adults wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place for members to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a Director or a senior staff member is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Managing Director.
- Guarantee that there are effective and appropriate SEND4 local safeguarding arrangements.
- Make sure that members are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children or adults at risk, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support members to be themselves at college, e.g. if they are LGBTQ+.
- Ensure SEND4 have clear systems and processes in place for identifying possible mental health problems in members, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers/work experience are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child and adult protection training updates, e.g. emails, as required, but at least annually.
- Have overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers/work experience and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity



has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

- Guarantee that there are procedures in place to handle members' allegations against other members.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of members and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for members to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training, if required.
- Ensure that the designated teacher works with the VSH to discuss how the member premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the member's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for members who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.
- Ensure that appropriate arrangements are in place to keep children safe where facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensure that safeguarding requirements are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Establish robust health and safety and emergency evacuation procedures

The Managing Director has a duty to:

- Ensure that the policies and procedures adopted, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

- Ensure that staff implement appropriate filters and monitoring of online material.
- Ensure that SEND4 practises safe recruitment in checking the suitability of staff and volunteers/work experience to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensure that, where the organisation ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, adult safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- Be available during college hours for staff to discuss any safeguarding concerns. Ensure cover by a DDSL when absent.
- Arrange, alongside the Centre Managers, adequate and appropriate cover for any activities outside of college hours or terms.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the Managing Director to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager/Managing Director and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

- Work with the Managing Director and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at SEND4. This includes:
  - Ensuring that SEND4 know which members have or had a social worker.
  - Understanding the academic progress and attainment of these members.
  - Maintaining a culture of high aspirations for these members.
  - Supporting tutors to provide additional academic support or reasonable adjustments to help these members reach their potential.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these members are experiencing with tutors and the Senior Management.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a member's child protection file is transferred as soon as possible, and within five days, when transferring to a new provision, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands SEND4's Child Protection and Adults at Risk Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Ensure SEND4's Child Protection and Adults at Risk Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure SEND4's Child Protection and Adults at Risk Safeguarding Policy is available publicly, and parents are aware that SEND4 may make referrals for suspected cases of abuse or neglect, as well as the role SEND4 plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to members and taking account of their wishes and feelings; this includes understanding the difficulties members may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within SEND4, with other providers, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.

- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC/CIC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

### **3. Multi-agency working**

SEND4 contribute to multi-agency working as part of its statutory duty. SEND4 is aware of and will follow the local safeguarding arrangements.

SEND4 will be fully engaged, involved, and included in the person-centred approach towards local safeguarding arrangements. Once SEND4 is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

SEND4 will develop trusting relationships between families and agencies to protect the welfare of its members, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, SEND4 will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

SEND4 will also be mindful of the importance of inter-agency working in identifying and preventing CSE.

SEND4 will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on members' needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging other's assumptions in a respectful manner.

### **Information Sharing**

SEND4 recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet members' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on education to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the member being placed at risk of harm.

Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of members. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

#### **4. Our Approach and Procedures**

Within the realm of safeguarding, we address a range of concerns to ensure the health, safety, and well-being of young individuals both within and outside SEND4. Any apprehensions about a member's welfare should be promptly reported to the designated safeguarding leads (DSLs) or deputy DSLs, whether such concerns are first-hand or second-hand. Subsequently, an appropriate course of action will be determined.

Staff members should recognise that members might not always be prepared or able to express that they are experiencing abuse, exploitation, or neglect. There can be obstacles such as embarrassment, threats, vulnerability, disabilities, sexual orientation, or language barriers that hinder them from disclosing harmful experiences. Nonetheless, these factors should not dissuade staff from exercising professional curiosity and discussing any concerns they have about a member with the DSL. It is vital for staff to establish trustworthy relationships with members that foster open communication.

In the event of a disclosure, staff should:

- Treat the member's words seriously and respond calmly, avoiding interruptions.
- Reassure the member that they are not at fault; they are victims, not culprits.
- Communicate what steps will be taken next as soon as possible, avoiding promises of confidentiality that could hinder disclosure.
- Be precise while minimising leading questions, ensuring accurate information is conveyed without bias.
- Follow the TED approach: Tell, Explain, Describe.
- Record the conversation as accurately as feasible, using the child's language, and document it promptly.
- Share the information immediately with the DSL, either in person or through designated mobile numbers.

Should concerns arise regarding the safety and well-being of a member, or if there is a complaint, concern, or allegation involving an adult or oneself, follow these steps:

- Notify the DSL without delay.
- Carefully document what was witnessed, heard, or reported.
- Share the notes with the DSL, signing and dating them.
- Seek guidance from the DSL to mitigate or eliminate potential risks to member's well-being.



If a member faces immediate and significant harm, involve the DSL or a senior staff member to contact the police or social services for swift referral.

Every individual has the right to confidentially report concerns about another, free from harassment. Please refer to the Whistle Blowing Policy for detailed information. A concise summary of this guidance is presented to all staff members within the Code of Conduct.

Our actions related to child protection adhere to procedures delineated in documents from the Pan-Dorset Safeguarding Children Partnership.

Additionally, if a teacher or educational staff member suspects or becomes aware that female genital mutilation (FGM) is being carried out or is in danger of being performed on a girl under 18, they are obliged to report this to the police as a mandatory duty.

## **5. Early Help**

Early help means providing support as soon as a problem emerges, at any point in a child's life. SEND4 will be proactive in ensuring that every member is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with members to identify concerns as early as possible.

Any member may benefit from early help, but in particular, staff will be alert to the potential need for early help for members who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from SEND4.

SEND4 will not limit its support to members affected by the above and will be mindful of a variety of additional circumstances in which members may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from college, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the member's situation is not improving or is worsening.

## **6. Abuse, Neglect and Exploitation**

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that members can be at risk of harm inside and outside of SEND4, inside and outside of home, in an institutional or community setting by those known to them or by others, and online. Staff will also be aware that members can be affected by seeing, hearing or experiencing the effects of abuse.

All staff will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. Staff will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

All staff will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all members.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside SEND4 and/or can occur between members outside of these environments; this includes being aware that members can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a member being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

## **7. Specific Safeguarding Issues**





There are certain specific safeguarding issues that can put children and adults at risk of harm – staff will be aware of these issues.

Appendix A of this policy sets out details about specific safeguarding issues that members may experience and outlines specific actions that would be taken in relation to individual issues.

## **8. Child-on-Child Abuse**

For the purposes of this policy, **“child-on-child abuse”** is defined as abuse between members.

SEND4 has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Adults at Risk Safeguarding Policy’s statement of intent.

All staff will be aware that child-on-child abuse can occur between members of any age and gender, both inside and outside of college, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as “banter” or “part of growing up.”

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse.’
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

Some children may be particularly vulnerable and have an increased risk of abuse. We will recognise that children with SEND, or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. We will consider extra pastoral support for those children.



All members have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. We will give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to SEND4's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Members will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Members will also be reassured that they will be taken seriously, be supported, and kept safe.

SEND4's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as procedures outlined in Behaviour and Exclusion Policy, Anti-bullying policy and other relevant policies.

## **9. Online safety and personal electronic devices**

SEND4 will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all members will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Member attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a member's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- **Content** - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- **Contact** - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.



- **Conduct** - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
- **Commerce** - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams. Any concerns that members or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

SEND4 will ensure that appropriate filtering systems are in place on SEND4 devices and SEND4 networks to prevent children and adults at risk accessing inappropriate material. The appropriateness of filters and monitoring systems will be informed by the Filtering and monitoring standards, the Cyber security standards for schools and colleges, and the risk assessment required by the Prevent Duty. SEND4 will, however, ensure that the use of filtering and monitoring systems does not cause “over blocking,” which may lead to unreasonable restrictions as to what members can be taught online. SEND4 will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

### **Communicating with Parents**

As part of the usual communication with parents, SEND4 will reinforce the importance of members being safe online and inform parents that they will find it helpful to understand what systems SEND4 uses to filter and monitor internet use.

SEND4 will also make it clear to parents what their children are being asked to do online if required by the curriculum.

SEND4 will gain consent from any member over the age of 18 before contacting parents and recognised the need to make safeguarding personal. SEND4 will ensure that decisions are made with the young person agreement, and that we follow “nothing about me with me” rationale.

### **Reviewing Online Safety**

SEND4 will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by members.

### **Personal Electronic Devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and members is closely monitored by SEND4, in accordance with the relevant Policies.

Photographs and videos of members will be carefully planned before any activity with particular regard to consent and adhering to SEND4’s Data Protection Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve members who are LAC/CIC, adopted children, or members for whom there are security concerns, the Managing Director will liaise with the DSL to determine the steps involved. The DSL will, in known cases of members who are LAC/CIC or who have been adopted, liaise with the members' social workers, carers or adoptive parents to assess the needs and risks associated with the members.

Staff will report any concerns about members' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

## **Upskirting**

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by SEND4. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

## **10. Consensual and Non-Consensual Sharing of Indecent Images and Videos**

SEND4 will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as "sexting" or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the member, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in SEND4 community, including understanding motivations, assessing risks posed to members depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that members are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected members and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

SEND4' full response to incidents of consensual and non-consensual sharing of indecent images and videos, will be one of education however relevant professionals and/or the police will be contacted as per our safeguarding procedure.

## **11. Context of Safeguarding Incidents**

Safeguarding incidents can occur outside of SEND4 and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of members' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. SEND4 will provide as much contextual information as possible when making referrals to CSCS.

## **12. Members Potentially at Greater Risk of Harm**

SEND4 recognises that some groups of members can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of members. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

### **Members who need Social Workers**

Members may need social workers due to safeguarding or welfare needs. These needs can leave members vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a member has a social worker in order to make decisions in the best interests of the member's safety, welfare, and educational outcomes.

Where a member needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

### **LAC/CIC and PLAC**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The directors will ensure that staff have the skills, knowledge and understanding to keep LAC/CIC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the member.

The DSL will be provided with the necessary details of members' social workers and the VSH, and, for PLAC, personal advisers.

### **Members with SEND**

When managing safeguarding in relation to members with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the member's disability without further exploration; however, it should never be assumed that a member's indicators relate only to their disability
- Members with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for members with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a member with SEND, the DSL will liaise with the LA officer, as well as the member's parents/carers where appropriate, to ensure that the member's needs are met effectively.

## **LGBTQ+ Members**

The fact that a member may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ members can be targeted by other individuals. Staff will also be aware that, in some cases, a member who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as members who identify as LGBTQ+.

Staff will also be aware that the risks to these members can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these members and provide a safe space for them to speak out and share any concerns they have.

## **Members Requiring Mental Health Support**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a member has suffered, or is at risk of suffering, abuse, neglect or exploitation.

## **13. Use of SEND4 Premises for Non-College Activities**

Where SEND4 rent out premises or opens to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep members safe. SEND4 will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where SEND4 provide the activities under the direct supervision or management of SEND4 staff, child protection and adult at risk arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, SEND4 will seek assurance that the body concerned has appropriate safeguarding, child protection or adult at risk policies and procedures in place, including inspecting these as needed. SEND4 will also ensure that there are arrangements in place to liaise with SEND4 on these matters where appropriate. SEND4 will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

## **Extracurricular Activities and Clubs**



External bodies that host extracurricular activities and clubs at SEND4, e.g. charities or companies, will work in collaboration with SEND4 to effectively safeguard children or adults at risk and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of children and adults at risk. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

#### **14. Alternative Provision**

SEND4 will ensure that they will follow any procedures for a member's welfare during their time at SEND4.

SEND4 will be aware that members in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these members may be vulnerable to.

#### **15. Work Experience**

When a member is sent on work experience, SEND4 will ensure that the provider has appropriate policies and procedures in place. Where SEND4 have people conducting work experience, an enhanced DBS check will be obtained if the person is over the age of 16.

#### **16. Private Fostering**

##### **Private Fostering**

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where SEND4 become aware of a member being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

#### **17. Concerns about Members**

If a member of staff has any concern about a member's welfare, or a member has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that members 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. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a member.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and confidentiality section of this policy.





Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If a referral is made about a member by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the member. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the member.

If early help is appropriate, the case will be kept under constant review. If the member's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely.

If a member is in immediate danger, a referral will be made to CSCS/ASC and/or the police immediately. If a member has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, SEND4 will ensure that the member's wishes are always taken into account, and that there are systems available for members to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the member feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

SEND4 will consider whether a family group decision-making forum is appropriate to determine the help and support the family network can provide for a member where concerns have been raised about their safety or wellbeing.

## **18. Managing Referrals**

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS/ASC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the members involved. The DSL will work closely with the police to ensure SEND4 does not jeopardise any criminal proceedings, and to obtain help and support, as necessary.

Where a member has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made.



Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

SEND4 will not wait for the start or outcome of an investigation before protecting the victim and other members: this applies to criminal investigations as well as those made by CSCS/ASC. Where CSCS/ASC decide that a statutory investigation is not appropriate, SEND4 will consider referring the incident again if it is believed that the member is at risk of harm. Where CSCS/ASC decide that a statutory investigation is not appropriate and SEND4 agrees with this decision, SEND4 will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the member will be informed of the decisions made, actions taken and reasons for doing so. For those members aged under 18 discussions of concerns with parents will only take place where this would not put the member or others at potential risk of harm. SEND4 will work closely with parents to ensure that the member, as well as their family, understands the arrangements in place, such as in-college interventions, is effectively supported, and knows where they can access additional support. For adults at risk SEND4 will gain their consent to contact family or parents/carers.

## **19. Concerns about SEND4 Safeguarding Practices**

Any concerns regarding the safeguarding practices at SEND4 will be raised with the Managing Director, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the Managing Director, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

## **20. Safeguarding Concerns and Allegations of Abuse Against Staff**

All allegations against staff, supply staff, volunteers/work experience and contractors will be managed in line with SEND4's Managing Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. SEND4 are dealt with appropriately and that SEND4 liaises with the relevant parties.

When managing allegations against staff, SEND4 will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns," as defined in the Managing Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

## **21. Communication and Confidentiality**



When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within SEND4 and with other providers on transfer and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection, safeguarding and adult at risk concerns will be treated in the strictest of confidence in accordance with SEND4 data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, SEND4 will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, SEND4 will do all it can to protect the anonymity of the members involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a member, staff members will not promise the member confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects members from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the members involved. Discussions with parents will not take place where they could potentially put a member at risk of harm or without consent of a member over 18 unless it is deemed to be in their best interest. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to SEND4 will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised, and future breaches be prevented.

Where a member is leaving SEND4, the DSL will consider whether it is appropriate to share any information with the member's new provider, in addition to the child protection file, that will allow the new provider to support the member and arrange appropriate support for their arrival.

## **22. Safer Recruitment**

SEND4's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in SEND4 at times when children are on the premises.
- Regularly come into contact with children under 18 years of age or adults at risk.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The Directors will ensure that the appropriate pre-employment checks are conducted for all prospective staff, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all, volunteers/work experience, and contractors.

### **Ongoing Suitability**

Following appointment, consideration will be given to staff and volunteers'/work experience ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

### **Referral to the DBS**

SEND4 will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity, or they are suspended.

## **23. Single Central Record (SCR)**

SEND4 keep an SCR which records all staff, including agency and third-party supply staff, who work at SEND4.

All members of the advisory body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check

- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18
- A section 128 check for those in management positions, it is SEND4 policy to complete a section 128 check on all staff, this is ensured that it is not missed should a member of staff be promoted to a management position.

For agency and third-party supply staff, SEND4 will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks SEND4 would perform on any individual working in SEND4 or who will be providing education on SEND4's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers/work experience, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supplies agencies have completed all relevant checks will also be included.

SEND4 is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at SEND4.

## **24. Training**

Staff members will undergo safeguarding, child protection and adult at risk training at induction, which will be updated on a yearly basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Adults at Risk Safeguarding Policy.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour and Exclusion Policy.
- The Missing Member Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection, adults at risk and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.

- Contextual safeguarding.
- How to keep LAC/CIC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in SEND4.

The DSL and deputy DSLs will undergo child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, members with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by members with SEND.

## **25. Monitoring and Review**

### **Ensuring Ongoing Effectiveness**

The efficacy of our safeguarding policy is continually monitored and evaluated through:

Ongoing monitoring and evaluation, including feedback from members, professionals, parents, and staff, along with incident reports to the DSL.

Strategic monitoring and evaluation, involving formal case reviews and Dorset Safeguarding Annual Audit assessments.

By embracing these procedures, we are dedicated to safeguarding the well-being of our young individuals and creating a secure learning environment

This policy is reviewed at least annually by the DSL and the Managing Director. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is 1<sup>st</sup> September 2025



Any child protection incidents at SEND4 will be followed by a review of the safeguarding procedures and a prompt report to the Directors. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

- The DSL carries out an investigation as a priority and comply with any deadlines given
- The Chair of the Directors reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- SEND4 endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

## **Lockdown**

As part of our Safeguarding SEND4 has a Lockdown Policy. On very rare occasions, it may be necessary to seal off the provision so that it cannot be entered from the outside. This will ensure that members, staff and visitors are safe in situations where there is a hazard on site or outside our site in the near vicinity. A lock down is implemented when there are serious security risks on the premises due to for example, nearby chemical spillage, proximity of dangerous dogs, serious weather conditions or attempted access by unauthorised person's intent on causing harm or damage.

## **Contact Details**

### **DSLs**

Mrs Penny Bailey: 07894048839 [penny@send4.co.uk](mailto:penny@send4.co.uk)

### **Deputy DSLs**

Ms Lucia Sanchis :07954561674 [lucia@send4.co.uk](mailto:lucia@send4.co.uk)

Mrs Bev Gowman: 07427274253, [bev.gowman@send4.co.uk](mailto:bev.gowman@send4.co.uk)

Mrs Tracy Perren:07743931293, [tracy.perren@send4.co.uk](mailto:tracy.perren@send4.co.uk)

## **Important contact – Other professional Agencies**

SEND4 will use the resources, information and training provided by the Local Authorities below and will work in partnership with them at all times to ensure the safety of our members

BCP safeguarding children partnership [Pan-Dorset Safeguarding Children Partnership - BCP Safeguarding Children Partnership and the Dorset Safeguarding Children Partnership](#)  
Dorset safeguarding partnership [Dorset - BCP Safeguarding Children Partnership and the Dorset Safeguarding Children Partnership](#)

BCP Adult Safeguarding Board [Bournemouth, Christchurch and Poole Safeguarding Adults Board \(BCPSAB\) - Bournemouth, Christchurch and Poole Safeguarding Adults Board \(BCPSAB\)](#)





Dorset Safeguarding Adults Board [Dorset Safeguarding Adults Board - Dorset Council](#)

Local Authority Designated Officer (LADO)	
LADO service telephone number	<p>Dorset 01305 221122</p> <p><a href="mailto:lado@dorsetcouncil.gov.uk">lado@dorsetcouncil.gov.uk</a></p> <p>BCP 01202 817600</p> <p><a href="mailto:LADO@bcpcouncil.gov.uk">LADO@bcpcouncil.gov.uk</a></p>
Children's First Response and Early Help First Response Teams (inc MASH) - BCP	
Monday-Thursday 8.30-5.15	01202 123334
Friday 8.30-4.45	<a href="mailto:childrensfirstresponse@bcpcouncil.gov.uk">childrensfirstresponse@bcpcouncil.gov.uk</a>
Family Support and Advice Line - Dorset	
Monday-Thursday 9-5, Friday 9-4	01305 228558
Monday-Friday 9-5	<p><a href="mailto:earlyhelp@bcpcouncil.gov.uk">earlyhelp@bcpcouncil.gov.uk</a></p> <p><a href="mailto:childrensadviceduty@bcpcouncil.gov.uk">childrensadviceduty@bcpcouncil.gov.uk</a></p>
Safeguarding Adults Boards BCP & Dorset	
Bournemouth, Christchurch and Poole	<ul style="list-style-type: none"> <li>Email: <a href="mailto:asc.contactcentre@bcpcouncil.gov.uk">asc.contactcentre@bcpcouncil.gov.uk</a></li> <li>Telephone <b>01202 123654</b></li> </ul> <p>Out of Hours Service</p> <ul style="list-style-type: none"> <li>Tel. 0300 1239895 Evenings and weekends, including Bank Holidays</li> </ul>
Dorset	<ul style="list-style-type: none"> <li>call 01305 221016 (Monday to Friday, 8:30am–5pm)</li> </ul> <p>outside of our normal opening hours:</p> <ul style="list-style-type: none"> <li>01305 221000</li> <li>if someone is in immediate danger, call 999</li> </ul>
In an emergency or out of hours contact	
Bournemouth, Christchurch & Poole Out of Hours Service	01202 738256
Dorset Out of Hours Service	<a href="mailto:childrensOOHS@bcpcouncil.gov.uk">childrensOOHS@bcpcouncil.gov.uk</a>
Police Non-Emergency	101
Police Emergency	999
Other Agencies	
NSPCC Child Abuse Helpline & whistleblowing Advice line	0800 0280285
	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Channel helpline	0207 340726
Prevent Team	01202 229337
Anti-terror hotline	<a href="mailto:PreventReferrals@Dorset.pnn.police.uk">PreventReferrals@Dorset.pnn.police.uk</a>
NSPCC Radicalisation helpline	0800 789321
	0808 8005000
Reporting FGM	101 or MASH/FASL
NSPCC FGM Hotline	<a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a>
Forced Marriage Unit	020 7008 01510
	<a href="mailto:fm@fcdo.gov.uk">fm@fcdo.gov.uk</a>

## Referenced Documents and Links

[Working Together to Safeguard Children](#) updated July 2018  
[Keeping Children Safe in Education](#) updated September 2025  
[Pan-Dorset Safeguarding Children Partnership's \(PDSCR\) Procedures](#)  
[UK Council for Child Internet Safety \(UKCCIS\), Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People](#)

## Specific Safeguarding Issues

This appendix sets out details about specific safeguarding issues that members may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Members with family members in prison
14. Members required to give evidence in court
15. Mental health
16. Serious violence
17. Adult involvement in youth-produced sexual imagery

## Domestic Abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

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

- Are relatives.

SEND4 will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

## **Homelessness**

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

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

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

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## **Children Absent from Education**

A child who is absent from college can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. SEND4 will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of members becoming absent from education in the future. Staff will monitor members that are absent from the college, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Missing Member Policy. SEND4 will inform the LA of any member who fails to attend regularly or has been absent without SEND4 permission for a continuous period of 10 days or more.

SEND4 will follow the DfE’s guidance on improving attendance where there is a need to work with children’s services due to college absences indicating safeguarding concerns.

## **Admissions**

Members are placed on the admissions register at the beginning of the first day that is agreed by SEND4, or when SEND4 has been notified that the member will first be attending.

SEND4 will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each member where possible. Staff will monitor members who do not attend SEND4 on the agreed date and will notify the LA at the earliest opportunity.



If a parent or young person notifies SEND4 that their young person or they will live at a different address, SEND4 will record the following information on the admissions register:

- The full name of the parent with whom the member will live (if applicable)
- The new address
- The date from when the member will live at that address

If a parent or young person notifies SEND4 that their young person or themselves will be attending a different provision, or is already registered at a different provision, the following information will be recorded on the admissions register:

- The name of the new provision
- The date on which the member first attended, or is due to attend, that provision

Where a member moves to a new provision, SEND4 will use a secure method to transfer members' data, if required to do so.

To ensure accurate data is collected to allow effective safeguarding, SEND4 will inform the LA of any member who is going to be deleted from the admission register, in accordance with the Education (Member Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of SEND4 by their parents or decided to leave.
- Have ceased to attend.
- Have been certified by a medical officer as unlikely to be in a fit state of health to attend.
- Have been in custody for a period of more than four months due to a final court order and SEND4 does not believe they will be returning at the end of that period.
- Have been permanently excluded.

SEND4 will also remove a member from the admissions register where SEND4 and LA has been unable to establish the member's whereabouts after making reasonable enquiries into their attendance.

If a member is to be removed from the admissions register, SEND4 will provide the LA with the following information:

- The full name of the member
- The full name and address of any parent with whom the member lives or the address of the young person.
- At least one telephone number of the parent with whom the member lives or a telephone number of an emergency contact.
- The full name and address of the parent with whom the member is going to live, and the date that the member will start living there, if applicable.
- The name of the member's new provision and the member's expected start date there, if applicable
- The grounds for removal

SEND4 will work with the LA to establish methods of making returns for members back into the centre. SEND4 will highlight to the LA where they have been unable to obtain necessary



information from parents, e.g. where an address is unknown. SEND4 will also highlight any other necessary contextual information, including safeguarding concerns.

### **Contextual safeguarding**

Contextual Safeguarding Contextual Safeguarding issues should be taken account of when considering any assessments, so it is important that schools and colleges provide as much information as possible as part of the referral process. Working Together and KCSIE documents provide further information.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools & colleges and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

<https://contextualsafeguarding.org.uk/>

### **Child Abduction and Community Safety Incidents**

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of SEND4 that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with members.

Members will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

### **Child Criminal Exploitation (CCE)**

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

SEND4 will recognise that members involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. SEND4 will also recognise that members of any gender are at risk of CCE.

SEND4 staff will be aware of the indicators that a member is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from SEND4 or education or not taking part.

## County Lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, staff will be aware of the specific indicators that a member may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging,’ where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of members with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a member may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

## Cyber-Crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking.’
- Denial of Service attacks, known as ‘booting.’
- Making, supplying or obtaining malicious software, or ‘malware,’ e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring members to the National Crime Agency’s Cyber Choices programme.

## Child Sexual Exploitation (CSE)

For the purposes of this policy, “**child sexual exploitation**” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

SEND4 will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the member’s immediate knowledge, e.g. through others sharing videos or images of them on social media. SEND4 will recognise that CSE can affect any member who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes members aged 16 and above who can legally consent to sexual activity. SEND4 will also recognise that members may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

Staff will be aware of the key indicators that a member is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from SEND4 or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.



- Becoming pregnant.

All concerns related to CSE will be managed in line with SEND4's safeguarding procedure.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. SEND4 will cooperate as needed.

## Modern Slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a member may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

## FGM

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a member being at risk of FGM or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. SEND4's procedures relating to managing cases of FGM and protecting members will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a member under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine members, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that members may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the member. It is important to note that the member may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a member may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.

- The member coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman.'
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the member:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from SEND4, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called “**‘honour-based’ abuse (HBA)**,” which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

## **Virginity Testing and Hymenoplasty**

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

**Virginity Testing** - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

**Hymenoplasty** - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to

procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. SEND4 will educate members about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where members feel safe enough to make a disclosure.

Members aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a member is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A member is known to have requested either procedure or asks for help
- Family members disclose that the member has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the member is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A member has already experienced or is at risk of other forms of HBA
- A member is already known to social services in relation to other safeguarding issues
- A member discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A member displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A member appears fearful of their family or a particular family member
- Unexplained absence from SEND4, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in college work, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

SEND4 will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the member, including expediting arrangements for the procedure.

## **Forced Marriage**

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a member is at risk of, or has undergone, forced marriage, including, but not limited to, the member:

- Being absent from SEND4 – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming holidays.
- Being subjected to surveillance by siblings or cousins at the centre.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from SEND4 by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.

- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a member who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL will ensure the member is spoken to privately about these concerns and further action taken as appropriate. Members will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the member's family or those with influence in the community, without the express consent of the member, as this will alert them to the concerns and may place the member in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among members.

If a member is being forced to marry, or is fearful of being forced to, SEND4 will be especially vigilant for signs of mental health disorders and self-harm. The member will be supported by the DSL and senior mental health lead, and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims' needs at an early stage and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – SEND4 will use existing national and local protocols for multi-agency liaison with police and children's social care.

SEND4 will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

SEND4 will establish where possible whether members at risk of forced marriage have a dual nationality or two passports.

SEND4 will aim to create an open environment where members feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

SEND4 will take a whole company approach towards educating on forced marriage in the curriculum and environment will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to

members. Members will be encouraged to access appropriate advice, information and support.

Tutors and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

## Radicalisation

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Protecting members from the risk of radicalisation is part of SEND4’s wider safeguarding duties. SEND4 will actively assess the risk of members being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in members’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify members who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. SEND4 will work with local safeguarding arrangements as appropriate.

SEND4 will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, SEND4 will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the member’s parents, unless SEND4 have reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect members against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

## The Prevent Duty

SEND4 recognises its responsibilities in relation to section 26 of the Counter Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. This duty is known as the Prevent Duty (updated September 2023 and comes into force 31 December 2023):

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

- The Prevent lead will be the DSL;





- SEND4 will risk assess children for being radicalised and drawn into terrorism;
- Refer any Prevent concerns to police using the Home Office Prevent Referral Form ([https://www.dorset.police.uk/help-advice-crime-prevention/personal\\_safety/major-terror-incidents/prevent/](https://www.dorset.police.uk/help-advice-crime-prevention/personal_safety/major-terror-incidents/prevent/)) or contact the Prevent Team [PreventReferrals@Dorset.pnn.police.uk](mailto:PreventReferrals@Dorset.pnn.police.uk) or call the Anti-Terror hotline (contact details can be found at the end of this policy);
- Staff knows what to do to support those assessed and how to make a referral to the MASH or for immediate response call the Anti-Terror hotline;
- Where SEND4 has any concerns about children travelling to a conflict zone, advice may be sought from the Home Office and a referral to the MASH/FASL if still concerned;
- SEND4 will work in partnership with other agencies;
- SEND4 will engage with the Parent/Carer and family members who are in a key position to spot signs of radicalisation. We will assist and advise families who raise concerns and sign post them to support. SEND4 will discuss any concerns with Parent/Carer unless this is thought to put the child at risk;
- SEND4 will train staff to raise awareness;
- SEND4 has suitable policies and filtering to ensure that members are safe from terrorist and extremist material when accessing the internet ;
- British values are being promoted in the curriculum
- SEND4 will publicise the Educate against hate website to staff and parents <http://educateagainsthate.com/>
- The Curriculum and British Values agenda will be actively promoted to reduce the risks of members engaging with extremism.

SEND4 will build member's resilience to radicalisation and extremism by:

- Helping to improve their self-esteem and self-confidence
- Promoting inclusivity and community cohesion;
- Providing a safe environment for debating a range of issues such as British values, recognising and managing risk, making safer choices and the impact of pressure from others;
- Helping members understand how they can influence and participate in decision making.

The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

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

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals.
- Channel or Prevent Multi-Agency Panel (PMAP) awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.



## **Members with Family Members in Prison**

Members with a family member in prison will be offered pastoral support, as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

## **Members Required to Give Evidence in Court**

Members required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Members will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## **Mental Health**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a member has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – SEND4 will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify members whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how members' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a member that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

SEND4 will access a range of advice to help them identify members in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the Senior Mental Health Lead will be consulted.

## **Serious Violence**

Through training, all staff will be made aware of the indicators which may signal a member is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from college.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a member's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from college.
- Having been permanently excluded from college.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a member may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

SEND4 will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

### **Adult Involvement in Youth-Produced Sexual Imagery**

SEND4 will remain aware that not all instances of YPSI will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

### **Financially Motivated Incidents**

Financially motivated incidents of YPSI involving adults may also be called “**sextortion**,” where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:



- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.