POD81

Child Protection & Safeguarding Policy

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Appendix 1: types of abuse

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

Appendix 3: allegations of abuse made against staff (including low-level concerns)

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Important Contacts

Role	Name	Tel	Email
DSL	Weronika Piatas	01274 916968	weronicapiatas@pod81.co.uk
DDSL	Rebecca Barnes	01274 916968	
LADO		01274 435600	
MASH		01274 435600 Out of hours: 01274 431010	
If you believe a child or young person is at **immediate risk or significant of harm or injury,** contact the police on 999			
If you wish to speak to any member of the team and are unable to reach them, please call the Pod81 landline 01274 916968			

1. INTRODUCTION

This policy is based on the Department for Education's (DfE's) statutory guidance <u>Keeping children safe in education - GOV.UK</u> and <u>Working Together to Safeguard Children (2018)</u>, and the <u>Governance Handbook.</u> We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

Safeguarding is the action taken to promote the welfare of children and protect them from harm

Safeguarding and promoting the welfare of children means:

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

1. Child Protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering from, or likely to suffer, significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

2. We recognise that harm also means where a child or young person witnesses harm to another.

3. Safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

4. The purpose of this policy is to inform staff, parents, carers, volunteers about Pod81' procedures for safeguarding children and to enable everyone to have a clear understanding of how these responsibilities should be carried out.

5. We recognise that all adults, including teaching, non-teaching, temporary staff, volunteers, and governors, have a full and active part to play in protecting children from harm and that the child's welfare is our paramount concern.

6. All staff members believe that our Pod81 should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

7. We will also empower and support our staff where they have concerns for the safety of children and young people who do not attend our Pod81/ setting.

2. DEFINITIONS

Safeguarding and promoting the welfare of children means:

Protecting children from maltreatment

Preventing impairment of children's mental and physical health or development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. It may also include children seeing, hearing or experiencing its effects. Appendix 1 explains the different types of abuse.

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

Exploitation is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE (Child Criminal Exploitation) and CSE (Child Sexual Exploitation) can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

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

The local authority (LA)

Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

The chief officer of police for a police area in the LA area

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

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

3. SAFEGUARDING CULTURE IN OUR POD81

1. Child Protection Statement:

At Pod81, safeguarding and child protection is **everyone's** responsibility, and we take this responsibility very seriously. This policy applies to all staff and volunteers and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to off-site activities

2. It could happen here:

We will ensure all staff members maintain an attitude of 'it could happen here, it does happen here'; and feel able to raise concerns either about a child at risk or a member of staff whose behaviour may present a risk to a child.

3. Pod81 will:

Have safeguarding at the heart of everything we do.

Ensure we offer preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

This will be underpinned by our: Anti-Bullying Policy

> Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
>
> - Healthy and respectful relationships
> - Boundaries and consent
> - Stereotyping, prejudice and equality
> - Body confidence and self-esteem
> - How to recognise an abusive relationship (including coercive and controlling behaviour)
> - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
> - What constitutes sexual harassment and sexual violence and why they're always unacceptable

4. EQUALITY STATEMENT

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

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have the same protection, regardless of any barriers they may face.

Students at Pod81 have SEMH, ASD, ADHD and special educational needs and/or disabilities (SEND) and we understand that this may place them at a higher risk of abuse.

We also give special consideration to children who:

- Are young carers
- Have health conditions (see section 10)
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality Have English as an additional language
- Are known to be living in difficult situations - for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Have experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and Pupil Referral Unit.
- are at risk of modern slavery, trafficking, sexual and/or criminal exploitation are at risk of being radicalised or exploited
- have a parent or carer in custody, or is affected by parental offending

5. ROLES AND RESPONBILITIES

At Pod81, safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and volunteers. Our policy and procedures also apply to off-site activities.

o   **ALL STAFF**

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually or do training allocated via Flick.
- Engage in safeguarding training via Flick annualy.
- Ensure that they know who the Designated and Deputy Safeguarding Lead(s) is/are and how to contact them.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

  All staff will be aware of:

Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies, the Online and E-safety policy and the safeguarding response to children who go missing from education

The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSU deputies, and sharing information with other professionals to support early identification and assessment

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

What to do if they identify a safeguarding issue or a child tells them they are being abused, exploited or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

The fact that children can be at risk of harm inside and outside of their home, at school and online

The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children

What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

- **THE DESIGNATED SAFEGUARDING LEAD (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Weronika Piatas (Deputy Centre Manager) The DSL takes lead responsibility for child protection and wider safeguarding at Pod81. This includes online safety and understanding our filtering and monitoring processes on Pod81 devices and Pod81 networks to keep pupils safe online.

During term time, the DSL will be available during Pod81 hours for staff to discuss any safeguarding concerns.

The DSL can be contacted outside of Pod81 hours if necessary- email: weronicapiatas@pod81.co.uk

When the DSL is absent, the DDSL - Centre Manager will be on cover.

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

- Provide advice and support to other staff on child welfare and child protection matters

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the parent school, the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- Have a good understanding of harmful sexual behaviour

- Have a good understanding of the filtering and monitoring systems and processes in place at Pod81

The DSL will also:

- Keep the Centre Manager and Head of Centre informed of any issues

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

- The full responsibilities of the DSL and deputies are set out in their job descriptions.

- **THE CENTRE MANAGER**

The Centre Manager is responsible for the implementation of this policy,

including Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction

- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect or exploitation.

Communicating this policy to parents/carers when their child joins Pod81 and via Pod81 website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

6. CONFIDENTIALITY

The staff team at Pod81 understand through their training that timely information sharing is essential to effective safeguarding and know that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.

In addition, see the DfE Data Protection guidance for schools, which will help Pod81 staff, understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

Safeguarding training ensures that all Pod81 staff understand they should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

All staff need to be aware:

If a victim asks the Pod81 not to tell anyone about sexual violence or sexual harassment:

- o There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

- o The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL will consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk) check with the referring school.

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, the referring school should be informed and any further actions as per direction from the school.

- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- o Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering

which staff should know about the report, and any support for children involved

- o Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. RECOGNISING ABUSE AND TAKING ACTION

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

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

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

Speak to the DSL **immediately;** the DSL will inform the referring Pod81. Anybody can make a referral to children's social care and/or the police (see when to call the police: guidance for schools and colleges (npcc.police.uk)if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Referrals for children

Bradford Multi-Agency Safeguarding Hub: 01274 435600

(Out of Hours – 01274 431010 email childrens.enquiries@bradford.gov.uk

If you believe a child is in immediate danger you must call the police on 999.

Referrals for those aged 18 and over

1. To discuss concerns relating to a person aged 18 and over please contact Bradford Adult Social Care on 01274 431077

You can also use the following webpage to report child abuse to your local council:

https://systmonline.tpp-uk.com/Safeguarding/Home?OrgId=558423556104

- • **If a child makes a disclosure to you**

If a child discloses a safeguarding issue to you, you should:

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

Stay calm and do not show that you are shocked or upset

Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, have witnessed or heard abused, or are being exploited or neglected

- Not recognise their experiences as harmful

- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

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

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

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

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

Any staff member who either:

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

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

must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM, should speak to the DSL and follow our local safeguarding procedures.

Local Procedures:

Report safeguarding concerns to the DSL (or deputy) by:

- Completing a child protection incident report form. The staff member reporting the concern is only responsible for completing the front side of the form

- Forms must be completed then handed to a member of the safeguarding team as soon as possible

- Staff must not leave the Pod81 site without handing over the concern to the safeguarding team

- Child protection incident report forms need to contain clear, accurate, factual information Records must be dated and signed and written in blue or black ink

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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

If you have concerns about extremism

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

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

Where there is a concern, the DSL will get in touch with the referring school and take guidance from the DSL at the school.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which Pod81 staff can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

If you have a concern about mental health

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

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

If you have concerns about a member of staff (including a supply staff, volunteer or contractor), or an allegation is made about a member of staff (including a supply staff, volunteer or contractor) posing a risk of harm to children, speak to the Head of Centre/Centre Manager as soon as possible. If the concerns/allegations are about the Centre Manager, speak to the Head of Centre and if concerns are about the head of centre you can speak to the referring school.

The Centre Manager/Head of Centre will then follow the procedures set out in appendix 3, if appropriate.

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

If you receive an allegation relating to an incident where an individual or organisation was using Pod81 premises for running an activity for children, follow our Pod81 safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Allegations of abuse made against other pupils

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

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

Most cases of children hurting other children will be dealt with at Pod81 under our Pod81's bullying policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence could:

- put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up-skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it

- The DSL will contact the referring school and take advice from the DSL at the school. The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

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

Please also refer to our Anti-Bullying policy (2025-2026) regarding our approach to supporting students with managing their behaviour.

Creating a supportive environment at Pod81 and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images

- Be vigilant to issues that particularly affect different genders - for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

- Ensure staff reassure victims that they are being taken seriously

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

That even if there are no reports of child-on-child abuse in Pod81, it does not mean it is not happening - staff should maintain an attitude of "it could happen here"

That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to

- A friend may make a report

- A member of staff may overhear a conversation

- A child's behaviour might indicate that something is wrong

That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

That a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

That they should speak to the DSL if they have any concerns

That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our Pod81 from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution - we will liaise with the police and/or local authority children's social care to determine this.

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

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

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must

report it to the DSL immediately.

You must not:

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

- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

DO NOT Say or do anything to blame or shame any young people involved -

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate Pod81 staff- this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)

- If a referral needs to be made to the police and/or children's social care

- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

- What further information is required to decide on the best response

- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images or videos from devices or online services

- Any relevant facts about the pupils involved which would influence risk assessment

- If there is a need to contact another school, college, setting or individual Inform the referring schools and take advice if we are to inform the parents

- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

- The DSL will make an immediate referral to police and/or children's social care if: The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)

- What the DSL knows about the images or videos suggests the content depicts sexual acts

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which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the images or videos is under 13

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

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

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

Recording incidents

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

Curriculum coverage

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

- What it is

- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- issues of legality

- The risk of damage to people's feelings and reputation Pupils

also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images the

  receipt of such images

Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse

- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

- Safeguarding team posters are visible in every classroom so that pupils are aware of who the safeguarding team are.

- Pupils are made aware through discussion in the relationships/sex education curriculum and assemblies that they can report their concerns to a member of the safeguarding team or **any** member of staff that they feel comfortable to talk to.

- All staff are trained to ensure that they will appropriately reassure pupils following any disclosures made.

8. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

Please refer to the following policies:
Online and E-Safety Policy (2025-2026)
Data Protection Policy (2025-2026)
Mobile Phone Acceptable Use Policy (2025 – 2026)

Pod81 aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers

- Identify and support groups of pupils that are potentially at greater risk of harm online than others

- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

The 4 key categories of risk

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

Content - being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact - being subjected to harmful online interaction with other users, such as child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct - personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce- risks such as online gambling, inappropriate advertising, phishing and/or financial scams

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

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

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology

- Keeping personal information private

- How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to Pod81 for their own use, but will limit such use to non-contact time when pupils are not present

- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in Pod81, use of the Pod81's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the Pod81's IT systems. At Pod81, we use a system called Qustodio.

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our Pod81's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website.

9. NOTIFYING PARENTS AND CARERS

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will inform the referring Pod81 and take guidance on how to proceed, normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

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

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

10. PUPILS WITH SPECIAL EDUCATIONAL NEEDS AND HEALTH ISSUES

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than children that do not have SEND. Students at Pod81 have SEMH, ASD, ADHD and special educational needs. Additional barriers can exist when recognising abuse, neglect or exploitation in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

- The potential for pupils with SEN, disabilities or certain health conditions being

disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in managing or reporting these challenges

- We offer a high level of pastoral support for all students, with a high staff to student ratio.

11. PUPILS WITH A SOCIAL WORKER

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

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks.

- The provision of pastoral and/or academic support.

12. LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant Virtual school Heads

13. COMPLAINTS AND CONCERNS ABOUT SAFEGUARDING POLICIES

- **Complaints against staff**

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

- **Other complaints**

Pod81 uses the Department for Education's definition of a complaint, "an expression or statement of dissatisfaction however made, about actions taken or a lack of action". (Best Practice Guidance for school Complaints Procedures 2020). It is generally something that expresses a desire for redress of a grievance.

- **WHISTLE-BLOWING**

The Whistle-blowing Policy can be found on the Pod81 Website- *Whistle-Blowing Policy 2025.*

14. RECORD KEEPING

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern Details
  of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.

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

Safeguarding records relating to individual children will be retained for a period of time after they have left the Pod81.

If a child for whom Pod81 has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

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

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will

speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The safeguarding team at Pod81 use an electronic-based system to store confidential safeguarding information-. The safeguarding team also store Child Protection Incident Report Forms in a-locked filing cabinet in the office.

15. TRAINING

15.1 All staff
All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the Pod81's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

- Be in line with advice from the 3 safeguarding partners

- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and deputies
The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training.

15.3 Recruitment - interview panels
At least 1 person conducting any interview for any post at Pod81 will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

16. Links with other policies

This policy links to the following policies and procedures:

(Behaviour) policy

Staff code of conduct

Complaints policy

Health and safety policy

Attendance and punctuality policy

Online and E-safety policy

Mobile phone use policy

Equality and diversity policy

First aid policy

Curriculum policy

Anti-bullying policy

Whistle-blowing policy

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

- Seeing or hearing the ill-treatment of another

- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

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

Appendix 2: safer recruitment and DBS checks -procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2024.

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

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

Advertising

When advertising roles, we will make clear:

Pod81's commitment to safeguarding and promoting the welfare of children That

safeguarding checks will be undertaken

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

Consider any inconsistencies and look for gaps in employment and reasons given for them Explore

all potential concerns

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

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history

- Whether they are included on the barred list

- Whether they are prohibited from teaching

- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales

- Any relevant overseas information

Sign a declaration confirming the information they have provided is true

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

Seeking references and checking employment history

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

When seeking references, we will:

Not accept open references

Liaise directly with referees and verify any information contained within references with the referees

Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is Pod81 based, we will ask for the reference to be confirmed by the Head of Centre as accurate in respect to disciplinary investigations

Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

Explore any potential areas of concern to determine the candidate's suitability to work with children

Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the Pod81's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

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

Verify their identity

Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

- For all staff, including teaching positions: criminal records checks for overseas applicants

- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

* Management positions are most likely to include, but are not limited to, Centre Manager and deputy/assistants.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a Pod81 or college, for teaching, training, instructing, caring for or supervising children; or

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that

work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with

  children; or An individual moves from a post that is not regulated activity to one

  that is; or There has been a break in service of 12 weeks or more

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

We believe the individual has engaged in relevant conduct; or We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the Pod81 has had the appropriate level of DBS check This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

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

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

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

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

- We will check the identity of all contractors and their staff on arrival at the Pod81.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Adults who supervise pupils on work experience

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

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

Appendix 3: allegations of abuse made against staff

Allegations against staff

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or

  possibly committed a criminal offence against or related to a child, and/or

- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children - this includes behaviour taking place both inside and outside of Pod81

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

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

- A 'case manager' will lead any investigation. This will be the Centre Manager/, or the Head of Centre where the Centre Manager is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

- If we receive an allegation of an incident happening while an individual or organisation was using the Pod81 premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

- Redeployment within Pod81 so that the individual does not have direct contact with the child or children concerned

- Providing an assistant to be present when the individual has contact with children

- Redeploying the individual to alternative work in Pod81 so that they do not have unsupervised access to children

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for Pod81.

- If in doubt, the case manager will seek views from Pod81's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations Substantiated:

there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer- for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary).

- Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the Pod81 is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Pod81 and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in Pod81 and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in

respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child - no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If Pod81 is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible Pod81 will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Pod81's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by Pod81, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while Pod81 carries out the investigation

We will involve the agency fully, but Pod81 will take the lead in collecting the necessary information and providing it to the LADO as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or Pod81 ceases to use their services, or the individual resigns or otherwise ceases to provide their services, Pod81 will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, Pod81 will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the Pod81.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the Pod81 will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the Pod81 will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

Pod81 will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as

appropriate, to agree:

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

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation

- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved

- Notes of any action taken, decisions reached and the outcome

- A declaration on whether the information will be referred to in any future reference

In these cases, the Pod81 will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 1O years from the date of the allegation if that is longer.

References

- When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated,* the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the Pod81's procedures or practice to help prevent similar

events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension

- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

Non-recent allegations

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

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

Where an adult makes an allegation to Pod81 that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

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

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

Concerns may arise through, for example:
- Suspicion

- complaint

- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside Pod81

- Pre-employment vetting checks

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

Definition of low-level concerns

The term 'low-level' concern is any concern - no matter how small - that an adult working in or on behalf of the Pod81 may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being over friendly with children

- Having favourites

- Taking photographs of children on their mobile phone

- Engaging with a child on a one-to-one basis in a secluded area or behind a closed-door

  Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns as per section 7.7 of this

  policy Empowering staff to self-refer

- Addressing unprofessional behaviour and supporting the individual to correct it at an early

  stage Providing a responsive, sensitive and proportionate handling of such concerns when

  they are raised Helping to identify any weakness in the Pod81's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Centre Manager/Head of centre will collect evidence where necessary by speaking:

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

- The Centre Manager/Head of Centre will use the information collected to categorise the type of behaviour and determine any further action, in line with the Pod81's staff code of conduct. The Centre Manager/Head of Centre will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at Pod81

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

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Children who are absent from education

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a Pod81
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves Pod81 without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when

applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always

involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late, regularly missing Pod81 or education.
- Not taking part in education

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse 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 and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

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

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of Pod81. It can also take place both face-to-face and online and can occur

simultaneously between the 2.

Our Pod81 has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our Pod81's approach to this type of abuse.

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage

relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children.

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in Pod81 (usually the designated safeguarding lead) before the child or children arrive at Pod81 the following day.

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

Homelessness

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

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

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues A girl:
- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from Pod81, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs - for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider) FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation - for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- Being unexpectedly absent from Pod81

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or Pod81 counsellor, as appropriate

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a Pod81s or colleges safeguarding approach.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;

Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

Pod81s have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our Pod81 being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at Pod81 and at home.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.
Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils'   behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance

- Rejecting activities, they used to enjoy

- Converting to a new religion

- Isolating themselves from family and friends

- Talking as if from a scripted speech

- An unwillingness or inability to discuss their

  views

- A sudden disrespectful attitude towards others

- Increased levels of anger

- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions

  Accessing extremist material online, including on Facebook or Twitter

- Possessing extremist literature

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex

- Through a group of children sexually assaulting or sexually harassing a single child or group of children

- Online and face to face (both physically and verbally)

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same Pod81.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the

impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not

    criminalise them Regularly review decisions and actions, and update policies with lessons

    learnt

- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

- Consider if there are wider cultural issues within Pod81 that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be

tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. Section 7.8 and 7.9 set out more detail about our Pod81's approach to this type of abuse.

Serious violence

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

- Increased absence from Pod81

- Change in friendships or relationships with older individuals or

  groups Significant decline in performance

- Signs of self-harm or a significant change in

  wellbeing Signs of assault or unexplained

  injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

Being male

Having been frequently absent or permanently excluded from school

Having experienced child maltreatment

Having been involved in offending, such as theft or robbery

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

Checking the identity and suitability of visitors

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

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

Visitors are expected to sign in and wear a visitor's lanyard at all times.

Visitors to Pod81 who are visiting for a professional purpose, such as educational psychologists and Pod81 improvement officers, will be asked to show photo ID.

All other visitors, including visiting speakers, will be always accompanied by a member of staff. We will not invite into Pod81 any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using Pod81 facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Missing pupils

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