

Safeguarding Children & Adults at Risk Policy and procedures

Approved by TCES Operational Board on behalf of
Thomas Keaney, CEO and Schools' Proprietor

Date of next formal review, September 2026

This policy applies to National Online School

Contents

Part One: Safeguarding at National Online School	5
Policy Introduction	5
Policy Review	5
Policy and Legislation	6
Definitions	6
Policy Outline	10
Procedures	10
Supporting our students	11
Supporting Staff	12
Prevention of harm.....	12
Confidentiality	12
Filtering and monitoring	13
Anti-Bullying	13
Roles and Responsibilities	13
Meeting the TCES Group Safeguarding Objectives	20
Standards	21
Areas of Safeguarding Focus / Safeguarding Themes	22
Abusive Images & Information Communication Technology (ICT)	22
Belief in 'possession' or 'witchcraft'	23
Children Looked After	23
Child abduction	24
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	24
Child-on-child Abuse	26
Children who are absent from education	27
Children who are lesbian, gay, bisexual, or gender questioning	27
Children with Special Educational Needs and Disabilities	28
Child Sexual Abuse	29
Contextual Safeguarding	29
Domestic Abuse	30
E-Safety including Filtering and Monitoring.....	32
Female Genital Mutilation (FGM)	32
Forced Marriage.....	36
Violence Against Women and Girls (VAWG)	37

Homelessness	37
Modern slavery and the National Referral Mechanism (NRM)	38
Non-compliance in child/adult protection and violence towards staff	39
Students requiring mental health support (including self-harm)	39
Preventing radicalisation and The Prevent Duty	40
Sexual Violence and Sexual Harassment between children	43
'Honour' Based Violence	43
Social exclusion	44
Upskirting	44
Use of the Internet	45
Young Carers	46
Additional Risk Considerations	46
Part Two: Child/Adult Protection	46
Training	47
Managing Child/Adult Protection Concerns	48
The Designated Safeguarding Lead	48
Immediate Action	49
Action by person initially identifying/receiving a concern or allegation	49
Historical Abuse	51
Initial Action by the DSL	51
Initial Consideration of Concern	52
Consent	52
Referral to the relevant Multi-Agency Safeguarding Hub (MASH)	53
Concerns Identified or Reported out of Office Hours	53
Action After Referral	53
Outcome of referral to MASH / Safeguarding Adults Team	54
Social work assessment/enquiry	54
Strategy discussion / meeting	54
Notification of interested persons	55
Notifiable Incidents	56
Action by staff during further assessment / enquiry and/or criminal investigation	56
Police Interviews with students – appropriate adults	57
Challenging Responses to Concerns/Allegations	57
Media	57
Record Keeping	57
Access to Safeguarding Records	58
Part Three: Managing Allegations Against Staff	59

Introduction.....	59
Abuse of Trust	59
Procedure.....	60
Initial Action by the Headteacher	60
Allegations received outside of normal office hours.....	61
Trivial Allegations.....	61
Initial Consideration	62
Reasonable Force	62
Referral to the Designated Officer for the Local Authority (LADO).....	62
Harm / Risk of Harm Threshold	63
Suspension.....	64
Record Keeping.....	64
References	65
Allegation Outcomes	65
Disciplinary Procedures.....	66
Resignations and settlement agreements	67
Inappropriate conduct towards students.....	67
Gross misconduct.....	68
Disciplinary appeal procedure	69
Referral to the Disclosure and Barring Service (DBS)	69
Referral to the Teaching Regulation Agency (TRA)	70
Learning Lessons.....	70
Part Four: ‘Low Level Concerns’	70
Introduction.....	70
Who does this policy apply to?	70
Purpose	71
Definitions.....	71
Responding to a Concern.....	72
Low-Level Concerns Procedure	73
Record Keeping.....	74
References	75
Part Five: Safer Recruitment (Recruitment, Selection and Disclosure).....	75
Appendix 1: Key Contacts.....	76
Appendix 2: Safeguarding procedures Flow Chart.....	77
Policy Sign Off.....	78

Part One: Safeguarding at National Online School

Policy Introduction

This Safeguarding Children & Adults at Risk Policy embodies the philosophy and ethos of the National Online School and the principles of [Working Together to Safeguard Children 2023](#) and the Department for Health and Social Care's [Care and Support Statutory Guidance 2014](#). We also adhere to the primary statutory guidance for the education sector, Keeping children safe in Education 2025

Safeguarding children and vulnerable young adults and promoting their wellbeing must run through the company like the lettering through a stick of rock. It is an attitude of mind, a belief system and a way of thinking that holds the wellbeing of our pupils at the forefront of every action, with their safety and protection at all times of paramount importance. Resolutely keeping in mind, the twin goals of safeguarding and the promotion of wellbeing informs and shapes our ways of working and will often help to resolve the many conflicts and dilemmas that can occur.

Policies and systems such as safer recruitment, behaviour management, child protection and whistleblowing procedures arise out of our belief system and are used to promote and sustain it. They are not an end in themselves but are essential tools and need to be kept 'live' to support the culture and to help maintain a commitment to best practice and legal requirements. They help clarify the actions we must take in some defined circumstances and may be useful reminders in areas where we have become hazy or are uncertain of what is expected of us. Ultimately, it is our belief that a commitment to safeguarding children and vulnerable adults and promoting their wellbeing will work to equal the safety and wellbeing of all staff members and other adults whose aim is to promote good education outcomes and future life experiences for young people.

We hope that all who share our commitment to safeguarding children and vulnerable adults and promoting their wellbeing, will find their own lives enriched by the experience. Your contributions make a significant difference in shaping a safer and brighter future for those who depend on us.

Thomas Keaney
CEO & Schools' Proprietor
TCES Group

Policy Review

This policy is reviewed annually by the Head of Safeguarding and Senior Management Team and is signed off accordingly by the CEO (please see – [The Policy Sign off](#)).

The Safeguarding Children & Adults at Risk Policy is available on the National Online School web site.

Policy and Legislation

The policy is based on the Department for Education's statutory guidance [Working Together to Safeguarding Children 2023](#) and the Department for Health and Social Care's [Care and Support Statutory Guidance 2014](#). We also adhere to the primary statutory guidance for the education sector, [Keeping children safe in education 2025](#)

This policy is also based on the following legislation:

- [The Children Act 1989 \(and 2004 amendment\)](#), which provides a framework for the care and protection of children
- [The Care Act 2014](#), which provides a framework for the care and protection of adults
- ['Mandatory Reporting of Female Genital Mutilation - procedural information', Home Office \(2016\)](#)
- [The Rehabilitation of Offenders Act \(1974\)](#)
- [Schedule 4 of the Safeguarding Vulnerable Groups Act \(2006\)](#)
- [The Prevent duty: Departmental advice for schools and childcare providers', DfE \(2015\)](#)
- [Meeting Digital and Technology Standards in Schools and Colleges \(March 2025\)](#)
- [The Childcare \(Disqualification\) Regulations 2009 and Childcare Act 2006](#)
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations \(2018\)](#)
- [Children Missing Education \(2018\)](#)
- [Preventing and Tackling Bullying \(2017\)](#)
- [Use of Reasonable Force \(2013\)](#)
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings' \(February 2022\)](#)
- [What to do if you're worried a child is being abused', DfE \(March 2015\)](#)
- [Information sharing: advice for practitioners providing safeguarding services \(May 2024\)](#)
- [Safeguarding and remote education \(2022\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(March 2024\)](#)
- [The London Child Protection Procedures](#) (as signed up to by [Merton Safeguarding Children Partnership \(ESCP\)](#)).
- [London Multi-Agency Adult Safeguarding Policy and Procedures](#) (as signed up to by [Merton Safeguarding Adults Board](#))

Definitions

Children includes everyone under the age of 18.

Adults includes everyone aged 18 and over.

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 the 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.

Safeguarding adults means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances.

Adults at Risk were formerly referred to as 'vulnerable adults' in previous legislation, a term which was felt to be both stigmatising and unhelpful in practice. We therefore use this term throughout this policy.

Abuse is a form of maltreatment. Somebody may abuse or neglect an individual by inflicting harm or by failing to act to prevent harm. 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. Individuals 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.

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, which is likely to result in the serious impairment of their health or development. Neglect may also occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, an individual's basic emotional needs.

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to an individual.

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

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

Emotional or Psychological Abuse also includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Sexual abuse involves forcing or enticing an individual to take part in sexual activities (not necessarily involving violence) irrespective of whether the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving individuals in looking at, or in the production of, sexual images, watching sexual activities, encouraging individual to behave in sexually inappropriate ways, or grooming an individual in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Domestic Abuse - any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to; psychological, sexual, financial or emotional.

Financial or Material Abuse includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Organisational Abuse includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practices within an organisation.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity

to make a decision unless it can be established that they lack capacity under the [Mental Capacity Act 2005](#).

Cyber Bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating, or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

Discrimination is abuse, which centres on a difference or perceived difference particularly with respect to race, gender, or disability or any of the protected characteristics of the [Equality Act 2010](#).

Forced Marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The [Anti-social Behaviour, Crime and Policing Act 2014](#) make it a criminal offence to force someone to marry.

Mate Crime as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been several Safeguarding Adult Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Modern Slavery encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce deceive and force individuals into a life of abuse, servitude, and inhumane treatment.

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

Policy Outline

It is the policy of National Online School to create and maintain a culture of professional curiosity and vigilance in safeguarding students and an active commitment to the promotion of their wellbeing. This is promoted through the maintenance of robust and rigorous recruitment and working practices, education, training and learning modules, child protection systems and multi-agency working.

It is therefore the responsibility of all staff to play an active role in safeguarding students and promoting their wellbeing and to promote the same in others. All staff must actively work to ensure students are protected from possible harm. They must provide a caring, positive, safe, and stimulating environment that helps to promote student's social, physical, emotional, and moral development as an integral part of their educational progress.

The aims of this safeguarding policy are:

- To support students' development in ways that will foster security, confidence, and independence.
- To raise staff awareness of all their own personal and professional responsibilities in safeguarding students and in identifying and reporting possible cases of abuse.
- To contribute to a systematic means of monitoring students known or thought to be at risk of harm and to develop and implement a structured procedure which will be followed in all cases of suspected abuse.
- To promote good levels of communication between all members of staff.
- To develop and promote effective working relationships with others, especially parents/carers, Local Authorities, the Police, Children's Social Services, and other partnership agencies.
- To ensure that all adults who have access to our students have been checked as to their suitability and to maintain effective supervision where it is required.
- To uphold the ethos of safeguarding our students, promoting their wellbeing and to work within the framework of the overall company policy.

Procedures

Our procedures for safeguarding children are in line with current statutory guidance, [The London Safeguarding Children Procedures](#) and [Merton Safeguarding Children Partnership](#) local safeguarding arrangements.

Our procedures for safeguarding adults are in line with the current statutory guidance, the [London Multi-Agency Adult Safeguarding Policy and Procedures](#) and [Merton Safeguarding Adults Board](#) local safeguarding arrangements

We will ensure that:

- We have a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead (DDSL) who undertake regular training in child protection and are available to staff, students, and external agencies. This training takes place more regularly than the recommended two years.
- All staff including, the DSL and DDSL will be updated annually on any additional guidance issued on safeguarding to provide them with relevant skills and knowledge to safeguard students effectively.
- All members of staff will be appropriately briefed, trained, and supported in implementing this safeguarding policy as well as the requirements of the statutory guidance and local procedures.
- All members of staff are supported to develop their understanding of the signs and indicators of abuse.
- All members of staff know how to respond to a student who discloses abuse.
- All parents/carers, students and members of staff are given information, guidance, and support regarding safe online conduct. This includes knowing how to report online content or activity that is inappropriate, abusive, or offensive, to the DSL.
- All parents/carers are made aware of the responsibilities of staff members with regard to our safeguarding procedures.
- Our procedures will be regularly reviewed and updated.
- All staff are fully vetted according to our safer recruitment procedures before commencing work with students.
- All new members of staff will be given a copy of this Safeguarding policy and procedures as part of their induction. They will all be required to read and sign to confirm they understand these documents and their responsibilities contained therein.

Supporting our students

- We recognise that a student who is abused or witnesses' violence may find it difficult to develop and maintain a sense of self-worth.
- We recognise that a student in these circumstances may feel helpless and humiliated and may feel self-blame.
- We recognise that our online education environment may provide the only stability in the lives of students who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a student in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- We will support all our students by:
 - Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying of any nature.
 - Promoting a caring, safe and positive online environment.

- Liaising and working together with all other support services and those agencies involved in the safeguarding of that student.
- Notifying Children's Social Care / Adults Social Care as soon as there is a significant safeguarding concern.
- Providing continuing support to a student about whom there have been concerns where relevant; including ensuring that appropriate information is forwarded under confidential cover to the new school or other education provision of students who leave National Online School.

Supporting Staff

- National Online School recognise that staff who become involved with a student who has suffered harm, or appears likely to suffer harm, may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their concerns with the DSL and to seek further support where needed, in consultation with The People Team (HR).
- We offer an Employee Assistance Programme that all staff can access, which offers free, confidential advice and assistance including counselling.

Prevention of harm

We recognise that we can play a significant part in the prevention of harm to our students by providing them with good lines of communication with trusted adults and an ethos of safeguarding, protection and e-safety. We will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that all children know there are adults whom they can approach if they are worried or in difficulty.
- Include curriculum opportunities which equip children with the skills they need to stay safe from harm (including online dangers) and to know to whom they should turn for help should they feel at risk/threatened or under unwelcome pressure.
- Ensure that cybersecurity measures are implemented and maintained across online learning platforms and company devices, to safeguard students and staff members and limit their exposure to online harms without unreasonably impacting teaching and learning.

Confidentiality

- National Online School recognise that all safeguarding matters are confidential.
- The DSL or deputy DSL will only disclose information about a student to other members of staff on a 'need to know' basis.
- We have a professional responsibility to share information with other agencies in order to safeguard students.
- We cannot and must not promise to keep secrets.
- We will always share information within the parameters of governmental guidance: [Information sharing: advice for practitioners providing safeguarding services](#) (May 2024)

Filtering and monitoring

Our policy on filtering and monitoring is set out in TCES Filtering and Monitoring policy. It acknowledges our responsibility to ensure all staff are trained and updated on the filtering and monitoring requirements and protect students from harmful and inappropriate online content by doing all that we reasonably can to limit student's exposure to risks from the school's IT system. This is achieved through implementation of filtering and monitoring systems that block harmful and inappropriate content without unreasonably impacting teaching and learning; and monitor internet activity with safeguarding concerns addressed through the necessary channels outlined within this policy. The effectiveness of TCES filtering and monitoring systems is reviewed regularly.

Anti-Bullying

Our policy on anti-bullying is set out separately and acknowledges that to allow or condone bullying including prejudice-based bullying and homophobic or transphobic bullying may lead to consideration under child protection procedures.

Roles and Responsibilities

At National Online School we are committed to safeguarding our students, and we expect everyone who works within our online school to share this commitment. All staff take all welfare concerns seriously and encourage students to talk to us about anything that worries them.

All staff are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. Where staff have a mental health concern about a student, they should raise the issue by informing the designated Safeguarding Lead or a deputy in the usual way.

Staff recognise that when a student has a social worker, it is an indicator that the student may be more at risk than most students. For example, this may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health. We take these needs into account when making plans to support students who have a social worker.

We will always act in the best interests of our students.

TCES Head of Safeguarding will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our website and has been written in line with Local Authority guidance and the requirements of Merton Safeguarding Children Partnership and Merton Safeguarding Adults Board policies and procedures.
- National Online School contributes to inter-agency working in line with [Working Together to Safeguard Children 2023](#) and [Care and Support Statutory Guidance 2014](#).
- A senior member of staff from National Online School's leadership team is designated to take the lead responsibility for safeguarding and child/adult protection.
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate child protection training that is updated annually.
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance.
- Appropriate filtering and monitoring systems are in place and reviewed regularly for efficacy.
- Safer recruitment practices are followed in line with the requirements of Keeping Children Safe in Education 2025 and the London Safeguarding Children Procedures.
- They lead on any allegations against staff in the absence of the Headteacher.
- They remedy, without delay, any weakness with regards to our safeguarding arrangements that are brought to their attention.

Our Headteacher will ensure that:

- The policies and procedures adopted by National Online School are fully implemented and followed by all staff.
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead (and any deputies) to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other statutory meetings, e.g., child protection conferences and core group meetings.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regards to students, and such concerns are addressed sensitively and effectively in a timely manner in accordance with our Whistleblowing Policy.
- All students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Relevant staff have completed Safer Recruitment training.

- The procedure for managing allegations against staff is known to staff.
- They operate the procedure for managing allegations effectively and refer relevant concerns to the Local Authority Designated Officer (LADO).
- There is the provision of an orderly, warm, supportive and above all safe environment for students to engage constructively with the online learning process.
- Parents/carers are aware that the full safeguarding policy are available on request. The safeguarding policy is available on the school website.
- They can act as Deputy Designated Safeguarding Lead (where required) in relation to safeguarding matters and ensure that appropriate action is taken on concerns or allegations of abuse or suspicion of harm, including the support needed for both students and staff.
- They oversee the encouragement and support of students in contributing to the development of good safeguarding structures, including diversity and equal opportunities, behaviour policy and behaviour management procedures, anti-bullying and diversity and equal opportunities policies and feedback and complaints mechanisms.
- They oversee the development of whole group processes such as class meetings and school councils to promote coproduction in addressing group issues and contribution to school planning and development.
- They develop and maintain good liaison, home/school contact and support for interagency working.
- They ensure that high professional standards are maintained in all essential and required record keeping, reporting and information sharing.
- They provide termly reports to the Head of Safeguarding and Proprietor (where requested) that cover information on the following: whole service/project matters, staff training and development (CPD), curriculum matters, child/adult protection issues and all other issues or developments in relation to all aspects of safeguarding and wellbeing.
- Students are taught about safeguarding, including online, through various teaching and learning opportunities, including PSHE, as part of providing a broad and balanced curriculum.
- Students are taught to recognise when they are at risk and how to get help when they need it.
- Students are informed, with the support of the curriculum and good role-modelling from staff, about diversity issues and discrimination.
- There is a culture that helps to promote good attendance, to manage behaviour positively and tackle harmful sexual behaviour, bullying and other forms of harassment.
- Education plans, behaviour/education contracts, curriculum topics and lesson plans are used wherever appropriate to support and reinforce the principles of personal safety, responsibility, and welfare.
- Students are encouraged and supported in contributing to the development of good safeguarding structures, including the behaviour policy and behaviour management procedures, equal opportunities, anti-bullying and anti-racism policies and feedback and complaints mechanisms.

- They liaise with the Head of Safeguarding and Proprietor (where requested) regarding the annual review of all policies and procedures relating to National Online School provision and the information to be given to the Local Authority/MASH on how the company's safeguarding duties have been fulfilled.

The Designated Safeguarding Lead (DSL):

The DSL is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child/adult protection within the school. The DSL will carry out their role in accordance with the responsibilities outlined in [Keeping Children Safe in Education 2025](#), [Working Together to Safeguard Children 2023](#) and the [Care and Support Statutory Guidance 2014](#)

National Online School Designated Safeguarding Lead:

Safiatou Bah

Tel: 0208 5437878

Email: DSLs@tces.org.uk

Email: Safiatou.Bah@tces.org.uk

The DSL will provide advice and support to other staff on student welfare and child/adult protection matters. Any concern for a student's safety or welfare will be recorded in writing and given to the DSL. The DSL and/or a deputy will always be available, for staff to discuss any safeguarding concerns via telephone and any other relevant media.

The DSL will be aware of students who have a social worker and help promote educational outcomes by sharing information about the welfare and any safeguarding issues with relevant teachers and National Online School leadership staff where appropriate.

The DSL will represent National Online School at any statutory safeguarding meetings where required to do so. Through appropriate training, knowledge and experience, our DSL will liaise with Children's or Adult's Services and other agencies where necessary and make referrals of suspected abuse to the relevant Local Authority, take part in strategy meetings/discussions and other interagency meetings, and contribute to the assessment of students.

The DSL will maintain written records and safeguarding files ensuring that they are kept confidential and stored securely.

The DSL is responsible for ensuring that all staff members (including volunteers) are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers, and regular visitors have received appropriate safeguarding and child/adult protection information during induction and that appropriate training needs are identified.

The DSL will also be the lead for 'Early Help' support (where applicable).

The DSL will ensure that the schools IT filtering systems are monitored with any safeguarding concerns actioned in line with the procedures in this policy. They will also ensure that staff are appropriately trained to understand our filtering and monitoring system and their responsibilities within this.

Each half-term, the DSL will submit a report to the Headteacher and Head of Safeguarding that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the school. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given.

The Proprietor will ensure that:

- National Online School policies prioritise the safeguarding of students and promote their wellbeing.
- Staff files are kept in accordance with the recruitment, vetting and HR/Employment policies and a single central record (SCR) is kept of all staff appointments, including agency supply workers, that provides secure evidence of Safer Recruitment processes being in place. This includes checking identity, qualifications and criminal records, eligibility to work with children and young people and eligibility to work in the UK and references (two references, one from the last employer). Prohibition from teaching checks (where applicable), overseas checks for those staff who have worked outside the UK and EEC and a check for medical fitness and staff member's employment history has been verified (full CV with tight chronology).
- Any gaps are investigated during the interview process and responses kept on file; this record to be held available for inspection or audit.
- Those involved with the recruitment and employment of staff to work with students have received appropriate safer recruitment training.
- Clear policies are in place and are consistently adhered to regarding internet and ICT use (including copyright laws), the use of photographs of students, one to one online working, visitors, off-site provisions, school trips, transporting children and work experience placements.
- Staff driving license and insurance details are verified beforehand, with copies held on file, where they may have responsibility for transporting children in private or company vehicles; details to be copied to the People Team at Central Services.
- Contact details of parents/carers are kept up to date and protocols established for when contact must be made or is recommended as good practice.
- Clear information is given to children and parents/carers on the education provision, including timetabling, procedures, contact details, requirements for information sharing, complaints and feedback mechanisms and the school's expectations of students and parents/carers and what they may expect in return.
- Students have clear access to and understand their right to use our formal complaint system and to be supported in making any complaint.

- Parents/carers are given copies of the complaints procedure and understand their right and the students' right to use the formal complaint system and to be supported in making any complaint.
- There is a clear policy on curriculum planning and curriculum development that promotes good learning skills and all-round development and encourages active student involvement in decision-making processes.
- The service is monitored to ensure that no student is discriminated against due to age, sex, gender reassignment, race, culture, religion, language, disability, or sexual orientation.
- There are clear procedures for unauthorised absences, children missing in education, children absent from education.
- Written parental consent is obtained where required.
- All staff members have an up-to-date copy of the staff handbook that sets out clearly the expectations the company has of them in regard to safeguarding students and promoting their welfare, as well as other matters relating to their TCES employment.
- Accurate, detailed records are maintained of all critical and/or notifiable incidents, including actions taken, and copied on the same working day to Central Services; any follow-up action or consequences must be similarly recorded and copied to Central Services.

Staff Responsibilities – as supported by the Headteacher and DSL (where relevant):

- All staff members must be familiar with and adhere to the company's policies and procedures.
- All staff members understand the importance of online safety (including filtering and monitoring), fully comply with all cyber security measures, and have access to timely information technology support.
- There is a firm commitment within National Online School to promote equalities issues and to ensure that no child is discriminated against due to age, gender, race, culture, religion, language, disability, or sexual orientation.
- There is a programme of Continuous Professional Development (CPD) in place for all staff to include the formal processes of Child Protection training and professional supervision and appraisal and all staff must ensure that they engage fully with these offerings.
- Safeguarding and child/adult protection responsibilities are clear to all staff members within the school, and they know whom to go to with any concerns, including any issues around colleagues' behaviour or practice.
- All staff are made aware that inappropriate behaviour towards children is unacceptable. Further information is available within the staff code of conduct. This includes, but is not limited to:
 - any form of sexual conduct, including sexually suggestive comments; ○ engaging in inappropriate or sexually provocative games; ○ lending or borrowing of money or property.
 - giving or receiving gifts; exclusive or secretive relationships.

- giving of home/personal mobile numbers, email addresses or home address details to children.
- 'Friending' or 'following' a child on any form of social media.
- For more details, refer to the TCES staff code of conduct and guidance for safer working practice.
- It is an offence for a person over 18 (e.g. teacher/TA) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of the child, even if the relationship is consensual and even if they do not work directly with them [*Sexual Offences Act 2003*].
- If they are found to have acted inappropriately towards a child, they may be referred to the Designated Officer for the Local Authority (LADO) and DBS for consideration of barring.
- Staff understand their responsibility in checking the identity of new and temporary staff and remaining vigilant to the requirements of safe practice, including the need to supervise visitors when they have access to children and formal checks have not been undertaken.
- There is a commitment to support the needs of 'Children Looked After'. This includes attending care reviews and personal education plans where requested. Staff will liaise with the virtual school where relevant to support outcomes.
- There is an understanding and commitment to good multi-agency working and information sharing, including the need for open debate and challenge.
- Staff understand and are committed to the company model of behaviour management and receive training in ways of managing challenging behaviour.
- Staff have a clear understanding of what constitutes safe practice and feel supported both in raising concerns about poor or unsafe practice and in having their own practice challenged by others.
- Concerns about poor or unsafe practice are addressed sensitively and effectively in a timely manner and in accordance with the company's whistleblowing and allegations against staff policy and commitment to openness of practice.
- Staff are prepared in advance for children to bring up personal problems within the classroom or wider school setting. Issues such as domestic violence and abuse can be difficult to broach directly, however discussions about personal safety and keeping safe can reinforce the message that any kind of violence is unacceptable. Raising these issues may lead children to bring up problems and concerns of their own. This is an opportunity to acknowledge that it is okay for young people to talk about their own problems and to signpost sources of help.
- Staff are trained to recognise and understand the boundaries and limitations of confidentiality in the context of their own safety and of child/adult protection
- Staff are supported effectively and protected from danger and/or the risk of violence.

The People Team (HR) department is responsible for:

- Ensuring that all agency workers have had all appropriate checks carried out on them by their agency prior to commencing a placement with the school and that

written confirmation of these checks have been received by the HR department from the agency prior to arriving at the school.

- Consulting with the Head of Safeguarding and Proprietor when concerns arise that warrant risk assessment e.g., entries on a DBS or safeguarding concerns on a reference.
- Ensuring that the school has confirmed the identity of the agency worker upon arrival at the school by viewing and keeping on file original photographic ID such as a passport.
- That all permanent employees have had all appropriate pre-employment checks carried out prior to commencing work with the school. These include but are not limited to;
 - A minimum of two satisfactory written references.
 - A satisfactory DBS check and a check of the DBS Barred Children List.
 - If appropriate, Police checks from any country where a candidate has lived overseas.
 - Qualifications, specifically those relating to Qualified Teachers, Therapists and Social Workers.
 - Identity checks – proof of identity, proof of date of birth, proof of current address, proof of eligibility to work in the UK.
 - Verification of the employees mental and physical fitness to carry out their work responsibilities.
 - Taking reasonable steps to establish whether the employee (applicable for “Teaching work” posts only) is subject to a prohibition order issued by the Secretary of State.
 - Check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State.

Meeting the TCES Group Safeguarding Objectives

Meeting TCES’ safeguarding objectives requires personal commitment and the support of systems designed to:

- Prevent unsuitable people from working with our students.
- Promote safe working practice and challenge poor or unsafe practice.
- Identify instances where there are grounds for concern about a student’s welfare and initiate or take appropriate action to keep them safe.
- Create a culture of openness, tolerance and respect for self and others.
- Promote personal growth and active learning, with staff and student ownership of the process, through their direct involvement in and contribution to curriculum matters and school development, including related policies and procedures and the school development plan;
- Contribute to safe and effective partnership working between all those involved with providing services for children and young adults.

Students within National Online School are actively encouraged and helped to understand what acceptable behaviour is, to show mutual respect for self and others, learn how to

stay safe from harm (including online dangers) and to speak out if they have any worries or concerns. They are also given encouragement and reassurance that any concerns they have will be listened to and taken seriously.

Creating a safe and enabling online learning environment requires openness of practice, a culture of vigilance and a clear focus on the culture and shared responsibility, and commitment to wellbeing by the following:

- Safe working practice and recruitment, vetting and Baring Service Checks, Single Central Record and employment procedures.
- Health and Safety, Risk Assessment and Risk Management.
- Filtering and monitoring policy and procedures.
- Behaviour policy and Guidelines to Managing Challenging Behaviour.
- Anti-bullying and Diversity and Equal Opportunities policies and ethos.
- Safeguarding and Child/Adult Protection policies and procedures.
- Philosophy and ethos.
- Whistleblowing, Equal Opportunities, Anti-bullying and Diversity and Equal Opportunities policies and ethos.
- Feedback mechanisms and Complaints Procedure.
- Curriculum planning and curriculum development.
- Work experience, education visits and extra-curricular planning.
- Commitment to the principles of the 'Every Child Matters' and 'Healthy Schools' agenda.
- Taking all reasonable measures to ensure that risks of harm to student welfare are minimised; and
- Taking all appropriate actions to address concerns about the welfare of a child or adult, working to agreed local policies and procedures in full partnership with other local agencies.

Standards

National Online School recognises the unique status of our students and seeks to ensure that they are treated respectfully as individuals. Relationships between staff also need to be based on mutual respect and dignity, with a focus on active support, openness of practice, good teamwork, the sharing of practical skills and knowledge and good role-modelling for students and each other:

- It is important that we maintain vigilance in safeguarding and e-safety and a focus on the strategies and good practice requirements for ensuring the promotion of their wellbeing.
- We need to ensure that all our recruitment, management and working practices are in line with safeguarding principles and good practice, that all staff are familiar with the policies and procedures and that they receive the necessary guidance, supervision, and training to enable them to contribute creatively and effectively to the provision of a safe and enabling, high quality online education experience for every student.

- We need to develop those aspects of the curriculum that support healthy growth and development in emotional and social as well as educational skills and that encourage students to 'speak out' if they have issues that are troubling them.
- We need also to ensure that we react promptly, fairly, and effectively in any instance of concern regarding safeguarding or child/adult protection, recognising that staff and students alike may find the process anxiety-provoking or threatening and are likely to need support.
- Clear information must also be given to students, parents/carers and partner organisations on our complaint's procedures and our safeguarding and information sharing responsibilities and obligations.

There are designated staff with specific responsibility for child/adult protection. Nevertheless, everyone working within National Online School is expected to fulfil the wider requirements for safeguarding students and promoting their welfare. All members of staff must accept that in all instances the welfare of the student is paramount.

Areas of Safeguarding Focus / Safeguarding Themes

Abusive Images & Information Communication Technology (ICT)

The internet has become a significant means of distributing abusive images of children and as technology develops, the internet and its range of content services can be accessed through various devices; There is a growing concern that children may be abused through:

- Taking, downloading and/or distribution of images of abuse of child/ren.
- Allowing /encouraging a child to have exposure to inappropriate material via ICT e.g., adult pornography and/or extreme forms of obscene material.
- Children engaging in cyber bullying and use of mobile camera phones to capture violent assaults of other children/young people for circulation.
- Images of abuse of children may be found in the possession of those who use them for personal use or distributed to children as part of the grooming process.
- Internet chat rooms, discussion forums and bulletin boards are used as a means of contacting children with a view to grooming them for inappropriate/abusive relationships. Subsequent communication may be via email, text message, instant messaging, or mobile phone.
- For the purposes of child protection, potentially abusive images of children can be divided into:
 - Unlawful material.
 - Material, which although lawful, would give cause for concern and indicate that the person possessing it may pose a risk to children.

Unlawful material

An abusive image of a child under the age of 18 years old includes images in photographs, films, negatives, video tape, data stored on computers that can be converted into a photograph and 'pseudo-photographs' (images made by computers graphics, or other means, which appear to be a photograph). This also covers electronic images used by video phones and texting.

- It is for a court to decide what is 'indecent' by application of recognised standards of propriety.
- Possession of such material is an offence. Taking, showing, or distributing such material amounts to a more serious offence.

Lawful material

- Lawful material falls outside the above definition but may involve children in an indecent or sexual context. This could include pictures, cartoons, literature, or sound recordings e.g., books, magazines, audio cassettes, tapes, CDs.
- The Police Child Abuse Investigation Unit (CAIU) can provide advice generally on matters of abusive images of children to other agencies.
- Abusive images involving children in an indecent or sexual context may be found in the possession of those who use them for personal use or distributed or used with children as part of the grooming process.

Belief in 'possession' or 'witchcraft'

Belief in 'possession' or 'witchcraft' is widespread and not confined to particular countries, cultures, religions or immigrant communities. Children involved can suffer damage to physical and mental health, capacity to learn, ability to form relationships and self-esteem.

A child/ren may be viewed as different or difficult, and this attributed to their being 'possessed' or involved in 'witchcraft'. Attempts to 'exorcise' the child may be made, that may involve severe beatings, burning, starvation, cutting or stabbing and/or isolation. This usually occurs within the child's household.

Staff should look for possible indicators and apply basic safeguarding principles, such as information sharing across agencies, to be able to identify those at risk of this type of abuse.

Children Looked After

The most common reason for children becoming looked after is as a result of abuse and/or neglect.

We recognise that 'care-experienced' and previously care-experienced children (commonly referred to as 'Children Looked After') may be at particular risk, both in terms of their life experiences and vulnerability and in the difficulties, they may have in recognising, or alerting people to, forms of abuse occurring in their lives. These children and young people require additional consideration for care, support, and vigilance. Staff must be alert to behaviour that is 'unusual' or a warning sign for any child, such as self-harm, absconding, repeated illness, or non-attendance. It is essential that staff do not allow the fact that the child is 'care experienced' to be an excuse for delay or non-action.

Child abduction

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Any concerns or allegations of child abduction or the threat of child abduction should immediately be brought to the attention of the DSL and be the subject of an urgent child protection referral.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- Appear with unexplained gifts, money or new possessions
- Associate with other children involved in exploitation • suffer from changes in emotional well-being
- Misuse alcohol and other drugs
- Go missing for periods of time or regularly come home late, and
- Regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- Have older boyfriends or girlfriends; and
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and at-risk adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Victims can be targeted and recruited into county lines in a number of locations including schools, children's homes and care homes. Victims are also increasingly being targeted and recruited online using social media. Children and at risk adults can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing (from school or home) and are subsequently found in areas away from their home
- Have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. Knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- Owe a 'debt bond' to their exploiters
- Have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#) and [The Children's Society County Lines Toolkit For Professionals](#).

Child-on-child Abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen online. Child-on-child abuse can include but is not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- Initiation/hazing type violence and rituals.

Even if there are no reports in our school it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they must speak to their DSL (or a deputy) without delay.

As a school, we operate a zero-tolerance approach to abuse, and we understand the importance of challenging inappropriate behaviours between students that are abusive in nature. Downplaying certain behaviours or dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for students and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Whilst it is more likely that girls will be victims and boys' perpetrators, all child-on-child abuse is unacceptable and will be taken seriously.

We provide accessible means for students to report abuse and will treat all reports seriously. Allegations of child-on-child abuse will be recorded, investigated, and dealt with

robustly. We are committed to supporting victims, perpetrators and any other children affected by child-on child abuse.

All allegations of child-on-child abuse should be reported to the DSL immediately, who will consider the need for escalation to statutory agencies. In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): [Sharing nudes and semi-nudes \(March 2024\)](#).

Children who are absent from education

All staff should be aware that students being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. National Online School has an Attendance Policy in place detailing what to do if a child is missing from education.

Staff must report all students missing from education for 10 consecutive days to the DSL who will inform social care and/or the relevant Child Missing from Education (CME) team.

For detailed information in relation to children missing from education please see the TCES Attendance Policy.

Children who are lesbian, gay, bisexual, or gender questioning

A child or at-risk adult being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other students. In some cases, a student who is perceived by other students to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as students who are.

[The Cass review](#) identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When

parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We are an inclusive school, and it is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where students can speak out or share their concerns with members of staff.

Children with Special Educational Needs and Disabilities

We recognise that children with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, and these are discussed in staff training. These additional barriers can include:

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

SEND students must receive the same level of protection from harm as other students and the same procedures must be followed. This must include ensuring and enabling students to:

- Make their wishes and feelings known.
- Receive appropriate personal, health and social education, including sex education.
- Raise concerns.
- Have a means of communication and a range of adults with whom they can communicate.

Child Sexual Abuse

Child sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. Children under 16 years of age cannot provide lawful consent to any sexual activity.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware that such concerns must be immediately reported to the DSL.

It should be noted that there are no typical families where sexual abuse occurs but there are some factors that occur in such families more frequently. These are:

- Poor or confused parent/child relationships (especially with mothers).
- Parents unavailable (especially mothers) through absence and physical or *mental illness or.
- Families with a stepfather or *where the mother has a succession of male partners.
- Violence between the adults, *especially of a male partner towards the mother

*These are also known key factors in situations of abuse between siblings, or by a child or young person towards another child or children.

Child pregnancy

The legal age for consent to sexual intercourse is 16. Assumptions should not be made that teenage pregnancies at any age are as a result of consensual sexual intercourse.

In all cases of a child's pregnancy becoming apparent to staff, consideration should be given to referring the matter to MASH in accordance with safeguarding referral procedures.

Staff who have regular contact with pregnant teenagers have a responsibility to consider the welfare of both the prospective mother and her unborn baby. Appropriate risk assessments will be taken in line with the health and safety procedures for students on roll who are pregnant.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the

different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers often have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

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

- A framework to address extra-familial risk through the lens of child welfare, as opposed to crime reduction or community safety.
- Reminders to utilise partnerships between children's services and agencies who have a reach into extra-familial contexts (such as transport providers, retailers, youth workers, residents' associations, parks and recreation services, schools and so on).
- Opportunities to measure success with reference to the nature of the context in which harm has been occurring, rather than solely focusing on any behaviour changes displayed by young people who were at risk in those contexts.

Our school seeks to develop contextual safeguarding by acknowledging context more explicitly in our work with students and families. This may include talking with parents about the context in which they are trying to parent their child and engaging students in activities where they can explore their feelings of safety in public, as well as private, spaces.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or

background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Barriers to domestic abuse disclosures by students may include:

- Protective of their victim parent/carer
- Protective of their abusing parent/carer
- Extremely fearful of the consequence of sharing family 'secrets' with anyone. This may include fears that it will cause further violence to the victim parent/carer and/or themselves
- Being threatened by the abusing parent/carer
- Fearful of being taken into care
- Fearful of losing their friends and school
- Fearful of exposing the family to dishonour, shame, or embarrassment
- Fearful that their mother (and they themselves) may be deported.

Staff should not press the student for answers but instead should:

- Approach the subject with a child with a framing question so that the subject is not suddenly and awkwardly introduced.
- Explain that the disclosure cannot be kept confidential, and that the information will be shared with social care.
- Listen and believe what the child says.
- Reassure the child that the abuse is not their fault, and it is not their responsibility to stop it from happening.
- Inform the DSL in accordance with this policy.

Parents/Carers can be given several telephone numbers, including the National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

E-Safety including Filtering and Monitoring

Online safety is taken very seriously at National Online School and robust systems are in place to ensure appropriate filters and monitoring systems (unless there is a specific approved educational purpose); are in place to identify children accessing or trying to access harmful and inappropriate content online.

Many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school, may sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Filtering and monitoring systems and our no student devices in school approach seek to mitigate the following risks:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual 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.

For full information – see TCES Group e-Safety/Acceptable Use/ICT Policy and TCES Filtering and Monitoring Policy

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. FGM is abuse and constitutes significant harm. Child protection procedures should be followed when there are concerns that a girl is at risk of, or is already the victim of FGM,

Section 5B of the 2003 Act introduced a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to

report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

TCES registered Teachers, Social Workers and Therapists must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless they have good reason not to, they should still consider and discuss any such case with the DSL (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the professional does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, professionals should follow safeguarding procedures, and report concerns to the DSL without delay.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act 2003. [Procedural information regarding the mandatory reporting of FGM](#) is available online.

FGM typically takes place between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an

'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting, or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs.

Our school aims to create an 'open environment' where children feel comfortable and safe to discuss the problems they are facing – an environment where FGM can be discussed openly, and support and counselling are provided routinely. Children need to know that they will be listened to, and their concerns taken seriously.

We create an 'open' and supportive environment by:

- Circulating and displaying materials about FGM.
- Displaying relevant information, e.g. Details of the NSPCC's Helpline and Child Line services, Careline, National Domestic Violence Helpline and appropriate black and minority ethnic women's groups.
- Ensuring that a private telephone is made available should children need to seek advice from the above organisations or other relevant groups discreetly.
- Informing/raising awareness about issues around FGM with colleagues – as well as including appropriate training in continuing professional development.
- Ensuring that the designated Safeguarding Lead is well versed in the issues around FGM.
- Encouraging young people to access appropriate advice, information, and support.
- Making materials such as books and DVDs available.
- Introducing FGM into the school curriculum within relevant classes, such as: Personal, Social and Health Education (PSHE) in England, – particularly in 'Sex and the Law' for Key Stages 3, 4 and 5, and ensuring accurate naming of body parts in Key Stage 1 which can be the first stage in ensuring that girls are aware of their bodies and rights Citizenship, Religious Knowledge, Drama, History, Sociology.

All staff should:

- Talk about FGM in a professional and sensitive manner.
- Explain that FGM is illegal in the UK and that they will be protected by the law.
- Recognise and respect their wishes where possible, but child welfare must be paramount. FGM is child abuse and against the law. If a member of staff believes that the girl is at risk of FGM, or has already undergone FGM, the police and social services must be informed even if this is against the girl's wishes. If you do take action against the Child's wishes, you must inform them of the reasons why.

- Activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and children's or adults' social care.
- Ensure that the girl is informed of the long-term health consequences of FGM to encourage her to seek and accept medical assistance.
- Liaise with the designated teacher with responsibility for safeguarding children.
- Refer the child, with their consent, to appropriate medical help, counselling, and local and national support groups.
- Ensure that safeguarding and protection is considered for any female family members.

Staff should not:

- Treat such allegations merely as a domestic issue.
- Ignore what the child has told them or dismiss out of hand the need for immediate protection.
- Decide that it is not their responsibility to follow up the allegation.
- Approach the child's family or those with influence within the community, in advance of any enquiries by the police, adult or children's social care, either by telephone or letter.

Remember:

- The child may not wish to be referred to a social worker, police officer or a guidance/pastoral/Headteacher from her own community.
- Consult other professionals, particularly an experienced manager/colleague, the local police child protection or domestic violence unit.
- Speaking to the Child's parents about the action you are taking may place the Child at risk of emotional and/or physical harm. Therefore, do not approach the family as they may deny the allegations, expedite any travel arrangements, and hasten their plans to carry out the procedure.

What to do when a child stops attending school

If a teacher or other member of staff suspects that a student has been removed from, or prevented from, attending education as a result of FGM, a referral should be made to the local authority adult or children's social care and the police. Staff may consider speaking to the student's friends to gather information – although they should not make clear that FGM is suspected as this may get back to the family who may hasten any plans to perform the procedure.

All staff should be aware that there may be occasions when a teacher visits the family to find out why the student is not attending school. The family may tell the teacher that the student is being educated overseas. Sometimes, the family may suggest that the teacher speaks to the student on the telephone. If this occurs, the teacher should refuse to speak on the telephone and (if the student is a British national) insist that the student is presented at the nearest British Embassy or High Commission.

Staff must not:

- Remove the student from the school register without first making enquiries and/or referring the case to the police and local authority adult or children's social care.
- Dismiss the child as taking unauthorised absence.

TCES ensures all staff are trained and understand that it is mandatory to report all instances of the practice in girls below the age of 18.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Educational settings often wrongly feel it is not their place to tackle the issue of forced marriage, however forced marriage is recognised as a form of domestic violence and a serious abuse of human rights. We recognise that our school can play an important role in safeguarding children from forced marriage

School staff should be alert to potential warning signs and consider (whilst being careful not to assume) whether forced marriage may be the reason. These warning signs can include:

- A sudden drop in performance.
- Truancy.
- Conflicts with parents over continued or further education.
- Excessive parental restrictions and control.
- History of domestic violence in the family.
- Extended absence through sickness or overseas commitments.
- Depressive behaviour including self-harming.
- History of siblings leaving education early and marrying early.

This is not an exhaustive list and if concerned please report this to the DSL.

Violence Against Women and Girls (VAWG)

Violence Against Women and Girls (hereafter VAWG) is the term given to all forms of violence and abuse experienced disproportionately by women and girls, or experienced by them because of their gender, including rape, domestic violence, forced marriage, 'honour' based violence, FGM and sexual harassment. VAWG is linked to women and girls' inequality and is neither acceptable nor inevitable.

The main forms of violence and abuse that girls experience in the UK alongside evidence on how widely they are experienced. In light of such high levels of abuse across the UK, education establishments will be aware of the importance of listening to, believing and supporting young survivors, so we also include information about responses to abuse and dealing with disclosures. If staff have a concern regarding a child who might be at risk of abuse or who has suffered from any forms of abuse as a young girl, they should speak to the designated Safeguarding Lead (or a deputy). As appropriate, the designated Safeguarding Lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to student welfare. The DSL and DDSL should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

In most cases school staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these students, and the DSL (or a deputy) will ensure appropriate referrals are made based on the students circumstances. The Department for Levelling Up, Housing and Communities have published joint [statutory guidance](#) on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation.

Temporary accommodation and transient lifestyle can also place students at risk of additional harms. Placement in temporary accommodation, often at a distance from previous support networks, can lead to individuals and families becoming disengaged

from services and support systems. Families who have experienced homelessness and are placed in temporary accommodation by boroughs may have very transient lifestyles.

Families in which children are harmed may move home frequently and avoid contact with caring agencies, so that no single agency has a complete picture of the family. Along with other indicators of potential risk, the following circumstances associated with some mobile families are a cause for concern:

- Child/ren not consistently registered with a GP.
- Child/ren attending hospital Emergency Departments frequently for treatment, rather than engaging with primary health services.
- Child/ren missing from a school roll, or persistently not attending.
- Information 'patch worked' across a network of agencies with no single agency holding the whole picture of a family history.
- Where there are outstanding child welfare concerns, unusual extended non-school attendance may indicate that the family has moved out of the area.

Modern slavery and the National Referral Mechanism (NRM)

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. All staff should be aware that exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in [Statutory Guidance](#).

Trafficking is defined as 'the recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, or use of force or other forms of coercion for the purpose of sexual or commercial exploitation or domestic servitude' (AFRUCA/ NSPCC). Trafficking in people involves crimes, spanning a variety of countries and involving an increasing number of victims, who can experience considerable suffering.

There are many factors that may indicate that a child has been trafficked, which can include:

- Going missing or missing for periods of time.
- A history with missing links and unexplained moves.
- Attending for a term or so before disappearing (schools need to look out for patterns of registration and de-registration).
- Has limited freedom of movement, is withdrawn or refuses to talk.
- Is known to beg for money; has no money/other financial resources but has a mobile phone or is driven around by an older male/boyfriend.
- Shows signs of physical or sexual abuse, signs of sexual behaviour or language and/or has contracted a sexually transmitted disease.
- Has not been registered with or attended a GP practice.

Safeguarding procedures should always be applied where there is suspicion that a student may be being trafficked and Police or the MASH must be informed.

Non-compliance in child/adult protection and violence towards staff

A feature in some serious case reviews has been the lack of co-operation and/or hostile attitude of parents/carers towards professionals. When there are welfare or safeguarding issues, a failure to engage with the family may have serious implications and non-intervention is not an option. This can lead to difficulties for all professionals working with the various family members.

In some instances, there will be a known history of actual violence.

Where non-co-operation, hostility or violence is an issue, it is important to appreciate the significance for a child or adult at risk living in the family i.e., it will enhance the parent/carer's power and control and the child or adult at risk may fear reprisals if s/he were to speak to professionals.

Staff may feel extremely vulnerable when visiting hostile families, especially those who challenge effectively and are perceived as a threat.

Professionals may end up putting more effort into dealing with the resistance than addressing the real problems for the child/ren.

It is good practice wherever possible:

- To be clear from the outset about what is known about the family and parents/carers, so as to assess both risks and potential strategies.
- To establish trust through active engagement, acknowledgement that the family may see things differently and demonstrating a respect for their views, whilst confronting inappropriate attitudes

Hostility and violence towards staff is a multi-agency issue, involving potential risks to staff of other agencies. If one agency has information that a parent/carer is known to be violent it has a responsibility to alert other agencies of the risks posed by that person.

MASH/Safeguarding Adult's Team should then convene a multi-agency meeting to share strategic approaches across agencies in forming an action plan, in accordance with information sharing arrangements. All decisions and communications must be recorded clearly and shared.

Students requiring mental health support (including self-harm)

Schools have an important role to play in supporting the mental health and wellbeing of their students. Mental health problems can, in some cases, be an indicator that a child or at risk adult has suffered or is at risk of suffering abuse, neglect or exploitation. Our school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. All concerns regarding mental health should be discussed with the DSL as per our safeguarding procedures.

Self-harm

Self-harm, self-mutilation, eating disorders, suicide threats and gestures by a student must always be taken seriously and may be indicative of serious mental or emotional health needs. The possibility that self-harm, including a serious eating disorder, has been caused or triggered by any form of abuse or chronic neglect should not be overlooked.

This may justify a referral to Children's Social Care for an assessment as a child in need and/or in need of protection. A staff member who is in doubt about the required response should seek advice from the DSL. There also may be a requirement to provide support with accessing CAMHS Services which the DSL will advise on.

Consideration must also be given to protect children who engage in high-risk behaviour which may cause serious self-injury such as drug or substance misuse, running away, partaking in daring behaviour such as running in front of cars etc, all of which may indicate underlying behavioural or emotional difficulties or abuse.

It is good practice, when a student is known to have either made a suicide attempt or been involved in self-harming behaviour, to undertake a multi-disciplinary risk assessment, along with safety planning (in collaboration with the student and parents/carers).

Preventing radicalisation and The Prevent Duty

At National Online School we recognise that students may be susceptible to radicalisation into terrorism. Similar to protecting students from other forms of harms and abuse, protecting students from this risk is a part of our safeguarding approach.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

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

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 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.

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](#). These may include:

Physical changes:

- Sudden or gradual change in physical appearance
- Sudden or unexpectedly wearing religious attire
- Getting tattoos displaying various messages
- Unexpectedly shaving their head (skinhead)
- Possesses unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person)

Social changes:

- Cuts ties with their friends, family or community
- Starts to become socially withdrawn
- Becoming dependent on social media and the internet
- Begins to associate with others who hold radical views
- Bullies or demonises other people freely
- Visits extremist websites, networks and blogs

Emotional and verbal changes:

- Advocates violence or criminal behaviour
- Exhibits erratic behaviour such as paranoia and delusion
- Speaks about seeking revenge
- Starts to exhibit extreme religious intolerance
- Demonstrates sympathy to radical groups
- Displays hatred or intolerance of other people or communities because they are different.

It is important to note that not everybody will share the same view or opinion. Holding a different view – religious, social, or political, does not mean that someone is radical. The concern is when someone with an extreme view act or intends to act upon their view(s) in a way that is harmful to themselves or others. Even if they do not intend to act upon their view, extreme views that are based on lies and misguidance can be extremely damaging to mental health.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately. Any concerns must be passed immediately to the DSL, which may result in the DSL (or a deputy) making a Prevent referral.

The Prevent Duty

Our school is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism”. This duty is known as the Prevent duty. The Prevent duty is seen as part of our wider safeguarding obligations.

Our DSL (and deputies) and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, particularly paragraphs 141-210, which are specifically concerned with education. The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments. To this effect, National Online School promotes fundamental British values as part of broader requirements through our curriculum relating to the quality of education and to promoting the spiritual, moral, social, and cultural development of children.

We ensure that National Online School is a safe place in which our children can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. We understand that the Prevent duty is not intended to limit discussion of these issues, however we are mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues as posed and placed on the proprietors of independent schools, by the Independent School Standards.

We risk assess all visiting speakers whether invited by staff or by children themselves and ensure that they are suitable and appropriately supervised; and our E-safety / Acceptable Use / ICT Policy is robust and sets out clear guidelines on internet use and appropriate levels of filtering and monitoring.

All staff undergo relevant training including ‘Prevent Training’ to give them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups. Staff will seek further guidance from their DSL who, if necessary, made a referral to the Channel Programme.

The Prevent lead at National Online School is the DSL and DDSL who are qualified social workers. Please see TCES Prevent Duty Statement on TCES website. Our DSL retains a London-wide local authority Prevent contact list.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. The designated Safeguarding Lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. [Statutory guidance on Channel](#) is available online.

Sexual Violence and Sexual Harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Students who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Our school champions a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable, and it will not be tolerated.

The initial response to a disclosure is important and should be reported directly to DSL. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Where a student's behaviour is deemed sexual, a child protection referral may be made to explore the reasons for the behaviour, as it may indicate abuse suffered elsewhere by the perpetrator and possibly the victim. The Police will be involved where a sexual crime is known or reasonably presumed to have been committed.

'Honour' Based Violence

‘Honour’-based Violence encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

If staff have a concern regarding a child who might be at risk of HBV or who has suffered from HBV, they should speak to the designated Safeguarding Lead (or a deputy). As appropriate, the designated Safeguarding Lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach

Social exclusion

Many families are multiply disadvantaged and face chronic poverty and social isolation. Additionally, they may experience problems associated with living in disadvantaged areas, e.g. high crime rates and poor services, as well as limited employment opportunities. Many lack a wage earner. Racism and racial harassment may provide further stress to families in these circumstances.

Poverty may mean the children live in crowded or unsuitable accommodation, have poor diets, health problems or a disability, are vulnerable to accidents and may lack ready access to educational and leisure facilities.

Children may be indirectly affected through the association of this social exclusion with parental depression, learning disability and long-term health problems. Referrals to statutory agencies should be made if the cumulative impact of the students circumstances indicates that they are suffering or likely to suffer significant harm.

Upskirting

The Voyeurism Offences Act, which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.

Upskirting is a highly intrusive practice, 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.

Transportation services have reported a rise in the offence however; it can occur anywhere and involve any gender.

Perpetrators can face up to two years imprisonment if found guilty of the offence where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress, or alarm. The law protects those who are victims of the offence from being named in the media.

Use of the Internet

The internet has become a significant tool in the distribution of abusive images of children, enabling ready access to such material. It may be downloaded and printed off in picture form or stored electronically on the hard drive of a computer, CD Rom, USB etc. Some adults use it to establish contact with children with a view to grooming them for inappropriate or abusive relationships. This may be accomplished through 'chat rooms' or contact by e-mail and may constitute an offence under The Sexual Offences Act 2003.

Children may be encouraged to access abusive images of children themselves through using apparently innocent words in an internet search engine.

As part of their role in preventing abuse and neglect, LSCBs or local safeguarding arrangements may offer activities to raise awareness about safe use of the internet and be a key partner in the development and delivery of training and education programmes with the Child Education and Online Protection Centre (CEOP). See www.ceop.gov.uk

CEOP has also set up its own website which has been designed and written specifically for young people. It contains games and up to date information on having fun, staying in control and being safer online as well as details on how to report problems. See www.ceop.gov.uk/children and young_people.asp.

The DSL should inform Police if they are aware that:

- A child has been the recipient of any suspicious contact through the internet or in receipt of pornographic material, as described above.
- A person may be in possession of abusive images of children or have placed/accessed abusive images of children on the internet.
- A child may have been inappropriately contacted or approached, directly or via the internet:
- Any individual involved in the creation, distribution, or possession of abusive images of children may also be actively involved in their abuse. Police are expected

to check whether anyone involved has access to children, including family and work settings, or is known to the child.

- A strategy discussion must be held whenever it is suspected a parent or carer of children or someone with access to children in other contexts:
- Is in possession of child abusive images of children; and/or has taken, shown or distributed child abusive images of children; and/or has used the internet to make inappropriate approaches to children

Young Carers

A 'young carer' is an individual aged under 18 who has a responsibility for providing primary or secondary care on a regular basis for a relative, often a single parent, or very occasionally a friend, whose needs may arise from:

- Physical or sensory disability.
- Learning disability or mental health related difficulty.
- Chronic or terminal illness.
- Misuse of drugs or alcohol.

Young carers are frequently involved in shopping, cooking, cleaning, ironing, washing clothes, budgeting the household income, and nursing responsibilities including provision of intimate personal care, as well as emotional support. This situation often leads the young person's needs being overlooked and may on occasions give rise to abusive experiences, which a young carer is reluctant to address for fear of intervention and breakup of the relationship.

If there is any concern that a young carer is at serious risk of neglect, abuse, or harm, this must be referred to children's social care and if appropriate, a strategy discussion held.

Additional Risk Considerations

Children and at risk adults are most commonly abused by someone known to them or close to them within a relationship of trust, responsibility, or authority such as a relative, neighbour, family friend, teacher, leader or peer member or acquaintance. They may then be placed under considerable pressure not to reveal what has been happening and may feel guilty and responsible for their involvement.

Part Two: Child/Adult Protection

Child/Adult protection is a part of safeguarding and promoting the welfare of our students. It refers to the activity that is undertaken to protect specific students who are suffering, or are likely to suffer, significant harm. Due to a minority of students receiving services from

National Online School being aged 18 or over, there are two legislative frameworks to consider in the protection of our students, namely the Children Act 1989 and the Care Act 2014. Whilst these legal frameworks are different, the nature of the response from statutory agencies has many similarities.

[Working Together to Safeguard Children 2023](#) sets out how organisations and individuals should work together to safeguard and promote the welfare of children.

The [Care and Support Statutory Guidance 2014](#) sets out how organisations and individuals should work together to safeguard and promote the welfare of adults.

Staff must be aware that:

- It is not the responsibility of staff in schools or other education settings to investigate allegations or suspected cases of abuse.
- Procedures are in place for dealing with allegations against staff members and full details of these can be found in the TCES' Dealing with Allegations Against Staff policy.
- Staff must not take any action beyond that agreed in the procedures established by National Online School and the relevant children's services.
- Staff cannot always promise a student complete confidentiality - instead they must explain that they may need to pass information to other professionals to help keep the student or others safe
- National Online School must ensure that parents are aware that the full texts of this safeguarding policy and associated policies are available on request

Training

All staff within National Online School receive safeguarding training which includes information regarding child/adult protection and updates as appropriate that equip them with the knowledge and skills necessary to carry out their responsibilities; this training will be refreshed at yearly intervals as a minimum.

Prevent Training is completed by the DSL for the National Online School who acts as our Prevent Lead. All our staff receive Prevent awareness training as part of their safeguarding induction process which is refreshed annually.

National Online School DSL, TCES Head of Safeguarding and the CEO will refresh their safeguarding training at appropriate intervals, to be able to discharge their duties competently. This training will include inter-agency working. In addition, all staff will be given an annual update to ensure that they are fully informed on updated guidance and safeguarding practice.

Certificates will be placed on individual staff files on completion of any training provided.

Managing Child/Adult Protection Concerns

It is essential that any abuse issues are not trivialised or exaggerated and that the proper steps are followed. Please be aware that words and actions may be open to misinterpretation and therefore you should take great care to avoid situations in which your own words or actions could be misunderstood.

You are responsible for ensuring that abusive peer activities such as bullying do not occur or are actively addressed.

All steps must be taken to ensure that National Online School practices are safe for students and staff. Any concerns that you may have should be dealt with or reported swiftly.

You may become aware of possible abuse/welfare concerns in various ways. You may:

- See it happening.
- Suspect or have concerns because of signs such as those listed in 'identifying abuse';
- Have concerns reported to you by a child or third party.

It is particularly important to respond appropriately and to remember always that the best interests of the student - and the need for any abuse to stop - come before the interests of anyone else, including TCES, National Online School or a potential abuser. Any member of staff with an issue or concern relating to Child/Adult Protection should immediately discuss it with the DSL or deputy DSL. It should also be made clear to students that confidentiality cannot be guaranteed in respect of safeguarding issues.

The Designated Safeguarding Lead

There is a DSL based in the National Online School and a deputy(ies) to act in their absence. Should they both be absent or unavailable, the matter must be referred to the Head of Safeguarding. Whilst new staff are awaiting their DSL training, the Head of Safeguarding will hold the role of DSL.

The DSL role includes:

- Taking lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Referring cases of suspected abuse to social care.
- Referring to the Headteacher if an allegation is made against a member of staff.
- Referring cases where a crime has been committed to the police (where appropriate).

- Liaising with the TCES's Head of Safeguarding where safeguarding enquiries and/or police investigations are in process.
- Acting as a source of support, advice, and expertise to staff on matters of safety and safeguarding and when deciding to make a referral by liaising with relevant agencies

Immediate Action

There is a difference between immediate danger and concern for a student. If an individual is perceived to be in immediate danger or at risk of harm a referral should be made to Children's Services/Adult's Services (dependent on their age) and/or the police immediately (anyone can make a referral). Concerns for a student must be raised with the DSL.

Where a concern is reported to/identified by a member of staff, the first priority is to establish whether the student is in need of medical attention and/or protection:

- If urgent action is required, medical assistance should be obtained if needed and an immediate referral made to the Local Authority and/or the police.
- If a student is in need of protection, police can initiate a police protection order (PPO) in cases of emergency, while MASH can apply to a court for an emergency protection order (EPO).
- The law also allows staff to take all reasonable steps to offer immediate protection to a child at risk of harm, e.g., from a violent or incapacitated parent.

Action by person initially identifying/receiving a concern or allegation

Any member of staff receiving details of a concern or allegation should:

- Respond with tact and care (remembering to keep an open mind).
- Listen and treat the concern seriously, avoiding expressions of shock or disbelief.
- Communicate as appropriate to the age and understanding and any communication or language difficulties of the reporting person.
- Allow the student to tell their own story. Research has shown that this initial telling can be the best therapy if they are able to 'talk it out'.
- Avoid leading questions.
- Avoid expressions of sympathy that may pre-judge issues of potential abuse.
- Avoid any promise of confidentiality but reassure student that the information will only be passed to those who 'need to know' in order to support safeguarding processes.

Staff should be aware that:

- The way in which you talk to a student can have an effect on the evidence which is put forward if there are subsequent criminal proceedings.

- While information must be gathered as accurately and thoroughly as possible when recording an allegation made by a student, it is important to attempt to minimise the number of times they have to repeat themselves.
- National Online School staff are only the first in a series of people who will talk to the student in the course of an investigation. Having to repeat themselves unnecessarily may be traumatic for the student. While child/adult protection procedures are being followed, the needs of the student may be overlooked, and the procedure itself may be experienced by them as abusive.

If a student chooses to tell a member of staff about possible abuse, there are a number of things that can be done to support the child:

- Stay calm and be available to listen.
- Listen with the utmost care to what the student is saying and check with them that you have heard what they have said correctly.
- Question normally without pressurising.
- Don't put words in the students' mouth but note the main points carefully; • Reassure the student and let them know that they were right to inform us.
- Inform the student that the information will have to be passed on.

The person receiving the concern should not:

- Interrupt the student reporting when they are recalling significant events.
- Make assumptions or interpretations.
- Make suggestions or offer alternative explanations; this could be construed as 'coaching' or attempting to dismiss or minimise what is being said.
- Use leading questions e.g., 'did they do To you?' or 'what did they do next?' use open questions only, such as 'what happened?' or 'do you have anything else to tell me?'
- Do not attempt to investigate any suspicion of abuse. Only sufficient information should be sought to clarify whether a concern should be referred to children's or adult's services and that decision lies with the DSL.
- Do not criticise an alleged abuser. The student may love him/her and be very protective of the relationship or confused about their own role in the abuse. There may also be the possibility of reconciliation.
- Do not ask the student to repeat it all for another member of staff.

The person receiving a concern should:

- Record in writing the information (if applicable, in the students own words), including times, dates, place of incident(s), persons present and what was said.
- Make a note of any accompanying non-verbal behaviour and how the information was imparted.
- Be careful to differentiate between fact, observation, allegation and opinion.
- Sign and date the written record (if this is not being recorded via MyConcern).

Staff should be aware that the notes you make may be disclosed in any subsequent prosecution. You may also be called to give evidence in court proceedings and may be asked to refer to your notes.

Any member of staff identifying or receiving details of a concern, must immediately:

- Report the matter to the DSL or their deputy.
- Make a written record of decisions made and action taken.
- Always act in the best interest of the student.

Historical Abuse

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years old.

Allegations of child abuse are sometimes made by adults and children many years after the abuse has occurred. There are many reasons for an allegation not being made at the time including fear of reprisals, the degree of control exercised by the abuser, shame or fear that the allegation may not be believed. The person becoming aware that the abuser is being investigated for a similar matter or their suspicions that the abuse is continuing against other children may trigger the allegation.

Reports of non-recent allegations of abuse may be complex as the alleged victims may no longer be living in the situations where the incidents occurred or where the alleged perpetrators are also no longer linked to the setting or employment role. Such cases should be responded to in the same way as any other concerns, with the procedures outlined within the policy followed. It is important to ascertain as a matter of urgency if the alleged perpetrator is still working with, or caring for, children.

Where this is known to be the case, or where the alleged perpetrator was in a position of trust at the time, these should be referred to the LADO in line with [Part 3](#) of these procedures.

Initial Action by the DSL

- Obtain written details, signed, and dated, from the person who initially identified or received the concern (not from the individual reporting the concern) and signed and dated by that person. This should be entered on to CPOMS by the reporting person as soon as possible and by the end of the school day.
- Record any information about times, dates and location of incident(s) and details of any potential witnesses.

- Do not attempt to investigate. Inappropriate questioning at this stage could jeopardise a safeguarding response or criminal investigation and may cause immediate distress to the student

Initial Consideration of Concern

The member of staff identifying or receiving the concern and the DSL should:

- Discuss the concern and all available information to decide on the most appropriate course of action.
- If there is any doubt about the action to be taken, the DSL should seek advice internally from the Head of Safeguarding.

Consent

In general, any concerns about a child's welfare should be discussed with the family and, where possible, agreement sought to make a referral to Children's or Adult's Services, provided this does not increase the risk of harm to the student or lead to the potential withdrawal of a statement or destruction of evidence.

The students' views should also be considered in deciding whether to inform the family, particularly where they are sufficiently mature to make an informed judgment, with the same provisos of due care.

Where there is doubt about involving the student's family, the DSL should clarify with Children's/Adult's Services (and the Head of Safeguarding where appropriate) whether, and if so when and by whom, the parents/carers should be told about the referral and what action to take where consent is refused. It will not be necessary to disclose personal details of the student and family unless the advice confirms that a referral is needed. In either case, the DSL must keep a record of the advice received and who provided it.

Action to ensure the safety of students must respect the rights, privacy, and dignity of parents/carers as far as possible without jeopardising the student's safety, recognising the stress that such interventions can cause and seeking to ensure that families are supported and services to support parenting/care are put in place.

Referral to the relevant Multi-Agency Safeguarding Hub (MASH)

Where the DSL / Head of Safeguarding decide that a concern needs to be referred to the relevant Local Authority, they should provide as much information as possible about the nature of the suspicions, the student, and the family, including:

- Full names, date of birth and gender.
- Family address.
- Name(s) of person(s) with parental responsibility or primary carer(s).
- Names and dates of birth of other household members, if known.
- Any need for an interpreter, signer, or other form of communication.
- Any special needs.
- Any current and previous concerns, significant events or involvement of other agencies in the students life.
- Developmental needs and parents'/carers' ability to respond to these needs (where known).

If urgent action or referral is required, the collation of such information must not be allowed to cause delay:

- The DSL must telephone the MASH where the student lives or is at the time.
- The referral should be made immediately if urgent action is required but within the same day as the allegation was reported regardless. The DSL should agree with the person receiving the referral what the student and parents/carers should be told and by whom.
- Where the referral is taken by a member of the MASH administration team, the DSL should seek to discuss the issue with someone from MASH.
- The referral should be confirmed in writing within 24 hours. The MASH should then acknowledge the written referral within one working day of receipt.
- The DSL must record the decisions taken and reasons, together with the names of those involved in making those decisions. This record needs to be timed, dated, and signed by all parties.

It should always be remembered that formal referrals from professionals cannot be treated as anonymous, and a parent/carer will ultimately become aware of the identity of the referrer.

Concerns Identified or Reported out of Office Hours

If a concern is identified or reported outside normal office hours, the DSL should contact the Local Authority Emergency Duty Team or the local police station. Written confirmation of the referral should be sent to MASH the next working day.

Action After Referral

Following referral, the MASH should, within one working day, consider the next course of action, record their decision on a referral and information record and notify the DSL.

Outcome of referral to MASH / Safeguarding Adults Team

The decision by MASH or Safeguarding Adults team will be either:

- No further action
- A recommendation for an 'Early Help' intervention (or similar intervention with regards to adult students)
- A Social Worker to conduct an assessment/enquiry under the Children Act 1989 or Care Act 2014 (dependent on the student's age).
- This assessment may require further information from and discussion with the school. The outcome will be recorded on an assessment record.
- Strategy discussion/meeting - an immediate multi-agency strategy discussion should take place where the information clearly indicates that the child or adult has suffered or is at risk of harm.
- The DSL should record the reasons for this decision and discuss who is best placed to inform the student if age appropriate and/or parent/carer.

Social work assessment/enquiry

The outcome of an assessment will be either:

- No further action
- A recommendation for an 'Early Help' intervention (or similar intervention with regards to adult students)
- The DSL should record the reasons for this decision and discuss who is best placed to inform student child if age appropriate and/or parent/carer.
- The student is in need of additional support - this may require a plan in which education is likely to be asked to assist.
- Strategy discussion/meeting - an immediate multi-agency strategy discussion should take place where the information clearly indicates that the child or adult has suffered or is at risk of harm.

Strategy discussion / meeting

If a strategy discussion/meeting is required, it may take the form of a meeting or a series of telephone calls. This should be convened by the relevant Local Authority, who will consider involving the following:

- Representative from the appropriate police child protection unit(s) (usually the Child Abuse Investigation Team or 'CAIT' with regards to child students).

- DSL or DDSL and other member of staff with knowledge of child.
- Manager from Children's Adult's Services.
- Social worker for the student.
- Other authorities/agencies as appropriate in cross border cases.
- Other authorities/agencies as appropriate e.g., health.

The strategy discussion/meeting should consider:

- The information provided about the circumstances and context of the concern.
- Whether any individuals are likely to be at risk.
- Whether it is necessary to review any previous concerns.
- Whether it is necessary to undertake further interviews with individuals.
- The response to the student's parents/carers and to the student (if age appropriate).
- Appropriate support for the student and their family

The strategy discussion/meeting should decide whether there should be:

- Enquiries by the Local Authority Children's Services under section 47 or section 17 of the Children Act 1989 and in accordance with local child protection procedures;
 - Related police investigations into possible criminal offences.
- No further action.

If the strategy discussion/meeting concludes that there should be an investigation by police and/or the Local Authority Children's Services, timescales and dates for future meetings should be agreed and tasks allocated.

If the decision of the strategy discussion/meeting is that there should be no further action under, the concerns may be referred to alternative agencies, including the school, for consideration of providing services to the student and family as part of an 'Early Help' intervention.

Minutes of the strategy discussion/meeting should be given to those taking part either immediately or as soon as possible thereafter. The DSL and/or other member of staff involved in the discussion/meeting should make a note of any actions required by the school / TCES.

Notification of interested persons

The Police or a strategy discussion may decide that child/adult protection enquiries or criminal investigation would be hindered by an approach to parties at an early stage or that certain information should not be divulged to them. The DSL should agree who is to be informed, by whom and what information should be given.

Notifiable Incidents

There are some incidents which are classed as “Notifiable”. This means in addition to the Head of School/Service, The Executive Headteacher, and the Head of Safeguarding must be immediately informed via phone call. The Notifiable Incident Alert form must be completed as soon as possible and before the end of the working day.

Staff should refer to the internal Notifiable Incidents procedure as outlined within TCES Escalations Systems and Procedure.

Action by staff during further assessment / enquiry and/or criminal investigation

- The MASH and/or the Police may ask for assistance, including the release of relevant information in order to assist their enquiries/investigation.
- Section 17 of the Children Act 1989 places a duty on organisations to assist a Local Authority exercising its duty to provide support and services to children in need.
- Section 47 of the Children Act 1989 places a duty on organisations to assist a Local Authority making enquiries into cases of children believed to have suffered or be at risk of significant harm.
- Section 42 of the Care Act 2014 places a duty on organisations to assist boroughs making enquiries into cases of adults believed to be ‘at risk’.
- The DSL should check that the MASH and/or Police have requested consent for the information to be shared when a request is received for any personal or sensitive information about a student, other individuals, or members of staff.

Consent will not be needed where:

- It is likely to increase the risk of harm to a child or other person.
- Consent is refused but the child/adult welfare concerns override the duty of confidentiality.
- Seeking consent is likely to impede a criminal investigation. In such instances, the DSL should monitor the progress of the case, by seeking regular updates from the Police and/or the Local Authority and record those updates.
- The DSL should keep a record of all information collected, decisions made (including whether the decision to override consent to share information) and actions taken. This record will include minutes of any strategy discussions/meetings attended. It should be noted that all records may need to be disclosed under the rules on disclosure in criminal investigations.
- Where the DSL is unsure about the legality of sharing information with any agency, advice should be sought from the Head of Safeguarding who will provide advice or seek the relevant legal advice.

Police Interviews with students – appropriate adults

Where students are requested to be interviewed by the Police, staff should inform the DSL and/or the Headteacher. Staff should be aware of the requirement for children to have an 'Appropriate Adult' present.

An 'Appropriate Adult' may include the parent/carer for that student or, if the student is a child looked after, a person representing that Local Authority. It could also include a social worker of a Local Authority.

Staff should notify the Head of Safeguarding about any requests for students to be spoken to by the Police where National Online School is involved.

Further information can be found in the Statutory guidance - [PACE Code C \(2023\)](#).

Challenging Responses to Concerns/Allegations

If at any stage a member of staff believes that a child/adult protection concern is not being dealt with properly, they should report their concerns to the DSL / Head of Safeguarding / CEO (where appropriate) and challenge the response given to those concerns if they remain unsatisfied. Should barriers to help and support for a particular student believed to be at risk stem from multi-agency working, consideration will be made around implementing escalation procedures as issued by the relevant Safeguarding Children Partnership / Safeguarding Adults Board.

Media

Child/Adult protection issues, including allegations against staff, may attract local and/or national media attention, depending on the seriousness of the matter or particular issues of interest at the time. This needs to be managed in a sensitive manner in order to minimise any distress to those involved.

Where a matter has attracted or is likely to attract media attention, advice must be sought from the CEO, who will consult with the relevant Local Authority media comms dept and other agencies as appropriate e.g., the Police. No staff member may make an informal or formal response to a media enquiry without the express permission of the CEO.

Record Keeping

It is essential that accurate records are kept where there are any concerns about the welfare of a student (e.g. referrals, conference minutes, reports). These must be kept securely and separately from a student's educational records.

Staff must keep the DSL informed of concerns regarding students (in addition to clear safeguarding and welfare concerns). This includes:

- Poor attendance and punctuality.
- Concerns about appearance and dress.
- Marked changes in, or unusual behaviour.
- Concerns about health and emotional wellbeing.
- Unexplained deterioration in educational progress.
- Discussions with parents/carers about concerns relating to their child.
- Concerns about home conditions or situation.
- Concerns about child-on-child abuse (including bullying).
- Concerns such as unknown adult(s) meeting a student regularly after school, or issues raised by a student about involvement in illegal drug use, crime, or street gangs.

This recording system must be regularly maintained by the DSL. When a student no longer receives a service from National Online School, the records must be sent under separate cover to the relevant Local Authority or receiving school (where appropriate). The DSL should ensure any safeguarding file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the student arrives. Photocopies of the records may be retained until receipt is confirmed by the student's new school.

All information written about students, or allegations made by students, must be kept to objective comments, verbatim accounts, and factual information.

Access to Safeguarding Records

Parents/carers have a right to know that their child is being referred to external agencies, unless it is reasonable to assume that this will place the child, or a member of staff, in danger or lead to the destruction of evidence.

Under the Data Protection Act 1998, any student who has a safeguarding file has a right to access it unless to do so would affect their health or well-being or that of another person or would be likely to prejudice an ongoing criminal investigation.

Parents/carers do not have an automatic right to see all the information held in safeguarding records. Information can be withheld if disclosure:

- Could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- Could reveal that the student or another person has been a subject of or may be at risk of abuse, and the disclosure is not in the best interests of the student; or
- Is likely to prejudice an ongoing criminal investigation.

If an application is made to see the whole safeguarding file, advice should be sought from the DSL who will discuss with the Head of Safeguarding.

When an agreement is reached to disclose information, all third-party information must be removed, or consent sought for its disclosure from the person concerned. For example, all identifying information about other students or members of the public who have shared information about the student must be removed before disclosing information.

Part Three: Managing Allegations Against Staff

Introduction

Our aim is to provide a safe online environment which secures the wellbeing of students in receipt of services from our school. We do, however, recognise that sometimes allegations of abuse are made. When they occur, allegations are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are individuals who deliberately seek to harm others.

For all staff, the most important consideration is to safeguard and promote the welfare of our students. Any allegations of abuse must be taken seriously. It is important to remember that the best interests of student - and the need for the abuse to stop - comes before the interests of TCES, the school or a potential abuser.

We will always ensure that procedures outlined in Working Together to Safeguard Children 2023, Keeping Children Safe in Education 2025 and Chapter 7 of the London Child Protection Procedures are adhered to and will seek appropriate advice from the relevant LADO in the area that the individual who is working or volunteering with children is working / volunteering.

Abuse of Trust

We know that some people seek access to children in order to abuse, and that abused children very often do not disclose the abuse at the time. We also know that some allegations of abuse made against professionals are substantiated, and there continue to

be a number of cases every year in which professionals in all sectors are convicted of criminal offences involving the abuse of children.

All staff need to know that inappropriate behaviour with or towards students is unacceptable. Staff are provided with clear guidance on keeping children and at risk adults safe as well as guidance on safer working practice to keep themselves safe as outlined in this policy and the staff code of conduct.

Procedure

All allegations or suspicions of physical, sexual, or emotional abuse or neglect by staff, including the use of restraint, other than permitted by law or guidance issued by Government and professional bodies and in line with TCES policy, will be considered under our safeguarding procedures initially and steps taken to ensure the welfare of the student(s) concerned.

The person receiving the concern or allegation should not attempt to investigate any allegation or suspicion of abusive behaviour themselves but assure the individual reporting it that what they have said will be passed on to the appropriate persons.

The person receiving the concern or allegation should:

- Make a written record of the information (if applicable, in the students own words), including the time, date and place of incident(s), persons present and what was said.
- Sign and date the written record.
- If any personal views are expressed about the information given, these must be recorded separately and clearly identified as such, signed and dated.
- Report the matter immediately to the Headteacher.
- In the absence of the Headteacher, the matter should be reported to the Head of Safeguarding.
- If the concern/allegation is against the Headteacher or Executive Headteacher, report the matter to the Head of Safeguarding and CEO.
- If the concern/allegation is against the CEO, this must be reported to the Head of Safeguarding and the People Operations Manager, who will consult with the LADO and Lead Safeguarding Governor on how to proceed.
- If the concern/allegation is against the Head of Safeguarding, this must be reported to the CEO and the People Operations Manager, who will consult with the LADO on how to proceed.
- The Headteacher should always advise The People Team (HR) when an allegation is made against a member of staff.

Initial Action by the Headteacher

On being informed of the concern/allegation, the Headteacher should:

- Ensure that the details of the concern/allegation have been recorded via Staffsafe as soon as possible and before the end of the working day on which the concern/allegation was raised.
- Ensure that they obtain written details of the concern/allegation, signed, and dated by the person receiving (not the student making the allegation) and being careful to differentiate between fact, supposition and feeling, if Staffsafe is unavailable for use.
- Countersign and date the written details.
- Record any information about times, dates and location of incident(s) and names of any potential witnesses via Staffsafe.
- Record any discussions about the student and/or member of staff, decisions made, and the reasons for those decisions via Staffsafe.
- Seek advice from the Head of Safeguarding or LADO, prior to the commencement of any further investigation.

The Headteacher should not interview the member of staff, student, or any potential witnesses until such time as advised by the LADO or Head of Safeguarding. No attempt should be made to investigate an allegation as inappropriate questioning could jeopardise further child/adult protection enquiries or criminal investigation(s).

Allegations received outside of normal office hours

In the event of an allegation being received outside normal office hours, the Head of Safeguarding should consider where there is an immediate risk involving children and if this is perceived to be the case, contact the Local Authority Emergency Duty Team or the local Police. Written confirmation of a referral should be sent to the LADO during the next working day.

Trivial Allegations

The Headteacher will need to use their professional judgment to identify at the outset an allegation which is trivial in nature. It will then be appropriate for it to be dealt with at that level. It is important to record the reasons for this judgment and how the matter was dealt with, e.g., notifying the parent/carer. The individual making the allegation may also consider the incident significant enough to report the matter directly to the LADO and/or Police or to some other agency such as Childline and so a written record of the issue is important to evidence actions taken in response.

The Head of Safeguarding should be contacted if there is any doubt, and in all cases a Staffsafe record must be made of the incident and made accessible to the Head of Safeguarding and the People Team within 1 working day.

Initial Consideration

Where allegations are not perceived to be trivial from the outset, the Headteacher and the Head of Safeguarding should conduct an initial consideration process of the information available in order to decide on the most appropriate course of action. If there is any doubt about action to be taken, advice can be sought from the LADO.

Where there are welfare concerns or concerns that an individual may be at risk of harm, a referral will need to be made to the relevant Local Authority Children's/Adult's Service in line with this policy.

The Headteacher and the Head of Safeguarding must keep a written record of any decisions made, the reasons for those decisions and any action(s) taken, both formal and informal.

Reasonable Force

Where the allegation relates to the use of reasonable force to restrain a child, the Head of Safeguarding will review any relevant information and provide written agreement to the Headteacher at the earliest opportunity as part of these procedures.

Referral to the Designated Officer for the Local Authority (LADO)

Where the threshold to consult with the LADO is met, this will be undertaken by the Headteacher within one working day and prior to any further investigation taking place. The Merton LADO (which is the relevant LADO for allegations relating to the National Online School staff) can be contacted to request a consultation or to make a referral via email: lado@Merton.gov.uk or by phone on: 0208 545 3187.

Allegations that require a LADO consultation include allegations where an individual working or volunteering with children has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates that they pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Behaved in a manner that discriminates against a child on the basis of one or more of their protected characteristics as defined by the [Equalities Act 2010](#).

Any staff who do not feel safe to raise their concerns within National Online School or TCES should initially consider speaking to the Safeguarding Lead Governor, Claire Ray prior to contacting the LADO.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Harm / Risk of Harm Threshold

Where the matter is deemed to meet the harm/risk of harm threshold, the LADO will convene an ASV meeting in line with Chapter 7 of the London Child Protection Procedures. The Headteacher of National Online School (alongside the Head of Safeguarding and a representative of the People Team) will attend this meeting and agree next steps alongside the LADO.

If the ASV meeting concludes that there should be an investigation by Police and/or Social Services Child Protection Team, roles, timescales. and dates for future meetings should be agreed and tasks allocated.

The Headteacher should canvas the views of the LADO, Police and Children's Services about whether:

- The accused member of staff needs to be suspended or alternatives to current work arrangements found (however the final decision will always rest with TCES's Proprietor and SMT)
- There are any constraints or limitations on the information that can be provided to the member of staff about the concern/allegation.
- The response to the child/ren's parents/carers and to the child/ren.
- Appropriate support for the child/ren and parents/carers.
- The response to the accused member of staff.
- Appropriate support for the accused member of staff and colleagues.
- The identity of the contact person to keep the member of staff informed of the progress.

It will be the final decision of TCES' Senior Management Team (SMT) as to whether any internal disciplinary investigation will be held in abeyance pending the completion of Police and MASH investigations. TCES' SMT will work in partnership with the multi-disciplinary team in line with Chapter 7 of the London Child Protection Procedures, but the final decision will always rest with TCES.

Where the matter is deemed not to meet the threshold of harm/risk of harm, the matter will be for National Online School / TCES to manage internally. The Head of Safeguarding alongside the Headteacher will agree how the matter will be investigated alongside the

People Operations Manager. For more details on concerns not meeting the harms threshold, please see below guidance regarding 'low level concerns'.

Suspension

When an allegation against a member of staff is made, and where there is cause to suspect a student is/are at risk of harm or the case is so serious that it might be grounds for dismissal, the member of staff may be suspended following an immediate risk assessment completed by the Headteacher (with advice from The People Team). This measure, if deemed necessary, will be undertaken without prejudice pending further enquiries during the initial consideration stages. During this time the member of staff will receive full pay, and any company benefits they may be entitled to.

During suspension any contact with students or communication with relevant individuals is prohibited and may lead to further disciplinary procedures. Contact with other employees must be discussed with and authorised by the Head of Safeguarding.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The individual should be informed at the point of their suspension who their named support contact is within TCES and provided with their contact details.

For further details on the Disciplinary process please refer to the TCES Disciplinary policy.

Record Keeping

All concerns and allegations against staff are recorded on the secure platform, Staffsafe. All staff members have system recording access, and oversight of the system is maintained by the Head of Safeguarding. Full user rights (including access to view, triage and action concerns) are limited to the Head of Safeguarding, People Operations Manager and Executive Headteacher. Headteachers have full user rights for their respective schools and services.

All records will include a clear comprehensive summary of the allegation, how the matter was followed up and resolved and notes of any action taken, decisions reached and the outcome and a declaration on whether the information will be referred to in any future reference.

If an allegation or concern is not found to have been malicious or false, The People Team will retain the records of the case on the individual's Staff personnel file and provide a copy to the individual. TCES will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation found to be malicious or false will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated, or malicious. We will also not refer to any history of repeated concerns or allegations which have all been proven to be malicious, false, unsubstantiated or unfounded within references.

Allegation Outcomes

The following are formal allegation outcomes along with their definitions that have had LADO oversight:

Substantiated: There is sufficient evidence to prove the allegation that a child has been harmed or there is a risk of harm.

Malicious: There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive. The police should be asked to consider what action may be appropriate in these circumstances.

False: There is sufficient evidence to disprove the allegation, however, there is no evidence to suggest that there was a deliberate intention to deceive. False allegations may be an indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the employer, in consultation with the LADO, should refer the matter to local authority children's/adults safeguarding team to determine whether the student is in need of services, or might have been abused by someone else.

Unsubstantiated: There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Unfounded: There is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

Where an allegation is shown beyond doubt to be demonstrably false, e.g., where there are objective witnesses to say that an incident could not have occurred, or the person accused was not present at the time, the Headteacher, in consultation with the Head of Safeguarding and The People Team, must:

- Inform the member of staff orally and in writing of the allegation and that there is no cause for further action to be taken under disciplinary or safeguarding procedures.
- Consider whether counselling and/or informal professional advice to the member of staff is appropriate and how this might be provided.
- Inform the parents/carers of the student(s) of the allegation and the outcome in writing
- Consider appropriate counselling and support for the student who made the allegation(s) and, where appropriate, their parents/carers.
- Consider the advisability or otherwise of the member of staff concerned having to work with that student again, and how that may be affected and supported.
- In particular consider what follow up action should be taken in regard to a person or student who has made an allegation that is shown to be false, especially if it is shown to have been made maliciously.
- Where a person other than the alleged student victim has made the allegation, consider informing the parents/carers and student and providing support as appropriate.

Disciplinary Procedures

TCES firmly believes that the fairest way to resolve any problems relating to conduct or performance is to have a well-structured disciplinary procedure. The procedure is designed to help and encourage all employees to achieve and maintain the Company's standards of conduct, attendance and performance and should be looked upon as a corrective process.

Employees have the following rights in relation to disciplinary action:

- To be informed of the allegations of misconduct or poor performance to be addressed at any disciplinary hearing.
- To be accompanied by a work colleague or by a trade union official;
- To appeal against any disciplinary action.

Any disciplinary action will only be taken after a full investigation of the facts, and if it is necessary. Employees will always be given as much information as possible regarding the allegations of misconduct, or any documentation detailing the shortfall in performance or capability that will form the basis of the disciplinary hearing. Employees will also be given fair and reasonable notice of the date and time of the hearing and whenever possible the disciplinary hearing will be held during normal working hours.

TCES reserves the right to vary the disciplinary procedure dependent on either the seriousness of the allegations of misconduct or capability to be addressed, or if

employees only have a short amount of service. Short service employees or those still within the probationary period, may not be issued with any warnings before dismissal.

TCES reserves the right to deduct from pay the cost of any damage or loss to property or goods, which after a disciplinary hearing was found to have been caused by an employees' negligence or vandalism.

Agency staff will be subject to the disciplinary procedures of their employer.

Refer to TCES Disciplinary Policy for further information.

Resignations and settlement agreements

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or school investigation where that is appropriate.

National Online School will not cease their investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations with a bearing on the safety or welfare of students, including any in which the person concerned refuses to cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers

Inappropriate conduct towards students

In the case of inappropriate conduct towards children, disciplinary action will consist of a minimum of a final written warning and may lead students dismissal for gross misconduct.

Final written warnings will be issued in situations where it is sufficiently serious to warrant only one warning but is not sufficiently serious to justify dismissal. Employees will be informed in the final written warning that any further misconduct or failure to meet the required standard will result in dismissal.

Dismissal will normally result if an employee still fails to achieve the standard of conduct or performance required by the Company, or for matters of gross misconduct. Employees will be given every opportunity to offer an explanation for any failure to meet the required standards at a final disciplinary hearing. As with all previous stages of the disciplinary procedure employees will be offered the right of a witness and the right to appeal against the decision.

Dismissed employees will be provided, as soon as is reasonably practicable, with the reasons for dismissal, the date on which their employment will terminate and details of how they may appeal.

Gross misconduct

Gross misconduct will result in summary dismissal, and employees will lose their right to notice or pay in lieu of notice.

Below is a list of offences that are normally regarded as “gross misconduct”. It is not exhaustive, but it describes the kind of offence that can result in summary dismissal:

- Deliberate failure to comply with the published rules of the Company, including those covering cash handling, security, health and safety, equal opportunities, the Internet, etc.
- Deliberate falsification of records.
- The committing of offences against current discrimination legislation whilst acting on behalf of the Company.
- Fighting or assaulting another person.
- Using threatening or offensive language towards customers or other employees.
- Making yourself unfit to work by solvent abuse, drinking alcohol, taking of illegal substances, or failing to follow medical instructions on prescribed drugs.
- Being in unauthorised possession of the Company’s property.
- Being in possession of illegal drugs and substances or alcohol whilst on Company premises.
- Obscene behaviour.
- Behaviour likely to bring the Company into disrepute.
- Willful and deliberate damage to or misuse of Company property.
- Refusal to carry out reasonable duties or instructions.
- Conviction on a criminal charge that is relevant to your employment with the Company.
- The misuse including use for personal gain, of Staff confidential information in the course of working for the Company.
- Undertaking private work on the premises without permission.

Disciplinary appeal procedure

At each stage of the disciplinary procedure, employees will be given the right of appeal. If an employee wishes to exercise their right of appeal, they should put their reasons in writing to The People Team within five working days of receiving written confirmation of the disciplinary decision taken against them. The employee will need to explain why they feel the decision is unfair, or inappropriate in relation to the matters addressed at the disciplinary hearing.

If the employee has any new information or evidence to support their appeal, they should give the details in full and include the names of any witnesses they may wish to call to support them in their appeal. This is in order to ensure that there will be sufficient time to investigate any additional information before the appeal hearing. Employees are entitled to be accompanied at the appeal hearing by a work colleague or by a trade union official.

Although the purpose of the appeal is to review any disciplinary penalty imposed, it cannot increase the disciplinary penalty. The decision of the person dealing with the appeal is final.

Refer to TCES Disciplinary Policy for further information.

Referral to the Disclosure and Barring Service (DBS)

There is a legal requirement for TCES to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- Engaged in relevant conduct in relation to children and/or adults.
- Satisfied the harm test in relation to children and/or adults at risk.
- Been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

All DBS referrals must be made by the Head of Safeguarding or the Executive Headteacher by completing the DBS referral form in consultation with the DBS referral Guidance.

The DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS (including what is the harm test and relevant conduct), and what information must be provided, can be found [online](#). Referrals should be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. It is important that as much relevant information is provided to the DBS as possible, as it relies on the quality of information provided by the school or college when considering the referral.

Referral to the Teaching Regulation Agency (TRA)

Where the school or TCES dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if there is a case to answer, must then decide whether to make a prohibition order in respect of the person. Details about how to make a referral to the TRA can be found [online](#).

Learning Lessons

At the conclusion of any case in which an allegation is substantiated, the Headteacher should review the circumstances of the case with the Head of Safeguarding, Proprietor and the People Operations Manager, and consultants and/or ASV meeting attendees to determine whether any improvements can be made to the company's or the school's practice or procedures to help prevent similar occurrences in the future.

Part Four: 'Low Level Concerns'

Introduction

This procedure enables all staff to share any concerns, not matter how small, about their own or another member of staff's behaviour with the Headteacher (or Head of Safeguarding in their absence) with a view to ensuring that students are safeguarded, and their welfare promoted.

Creating a culture in which all concerns about adults are shared promptly and with the right person, recorded and dealt with appropriately, is important. If implemented correctly, this should:

- Encourage an open and transparent culture.
- Enable the identification of inappropriate, problematic, or concerning behaviour early.
- Minimise the risk of abuse, and;
- Ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

Who does this policy apply to?

All staff who work with the National Online School either in an employee, volunteer or contracting capacity.

Purpose

The purpose of this policy is to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour which are set out in the code of conduct are constantly lived, monitored, and reinforced by staff.

To achieve this purpose the school will;

- Ensure that staff are clear about, and confident to distinguish, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour- in themselves and others, and the delineation of professional boundaries and reporting lines.
- Empower staff to share low-level concerns with the Headteacher and to help all staff to interpret the sharing of such concerns as a neutral act.
- Address unprofessional behaviour and help the individual to correct such behaviour at an early stage.
- Identify concerning, problematic, or inappropriate behaviour- including any patterns- that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO.
- Provide for responsive, sensitive, and proportionate handling of such concerns when they are raised; and
- Help identify any weakness in the TCES' safeguarding processes.

Concerns should be reported as soon as reasonably practical but within 24 hours.

Definitions

Appropriate conduct is the behaviour which is entirely consistent with the TCES staff code of conduct, policy and procedures and the law.

The distinction between an allegation and a low-level concern:

Allegation

The term 'allegation' means that it is alleged that a person who works with children has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Behaved in a manner that discriminates against a child on the basis of one or more of their protected characteristics as defined by the [Equalities Act 2010](#).

Low-level concerns

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- Is not consistent with TCES staff code of conduct, policy, and procedures (including conduct outside of work); and
- Does not meet the allegations threshold.

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, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Staff members are encouraged and should feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff, when reporting concerns, do not need to be able to determine in each case whether it is a low-level concern or a concern that meets the threshold of an allegation. The determination should be made by the Headteacher in collaboration with the Head of Safeguarding.

Responding to a Concern

The Headteacher will review the information and consult with the Head of Safeguarding to determine whether;

- The behaviour is entirely consistent with TCES staff code of conduct, policy and procedures and the law;
- The behaviour constitutes a low-level concern in which case a consultation will be held with the LADO;
- A referral to LADO is required;

- When considered with any other low-level concern(s) that have previously been raised about the same individual, should be re-classified as an allegation and referred to the LADO.

In cases where the low-level concern is about the Headteacher, the staff member should approach the Head of Safeguarding directly.

If it is decided that the low-level concern amounts to behaviour which is entirely consistent with the TCES staff code of conduct, policy and procedures and the law, it is important the Headteacher informs the individual in question what was shared about their behaviour and give them the opportunity to respond. The Headteacher should also speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with TCES staff code of conduct, policy and procedures and the law. This type of situation may indicate the code of conduct is not clear, the training has not been clear, or the low-level concern policy is not clear enough. If the same or similar low-level concern is subsequently shared by the same individual, and the behaviour is consistent with the TCES staff code of conduct, policy and procedures and the law, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived, if not about the behaviour itself and or the implementation of low-level concern policy. In these instances, the Headteacher should discuss this with the Head of Safeguarding so appropriate policies can be reviewed.

Low-Level Concerns Procedure

Once the Headteacher has determined the matter to be a low-level concern, they will speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/ other external agencies, where they have been contacted). They will also make appropriate records via Staffsafe of;

- All internal conversations, including the person who initially shared the low-level concern, the adult about whom has been shared, and any relevant witnesses.
- All external conversations (LADO/ external agencies).
- Their determination, the rationale for their decision and.
- Any action taken.

Low-level concerns should be responded to in a sensitive and proportionate way. Maintaining confidence that such concerns when raised will be handled promptly and effectively whilst on the other hand, protecting staff from any false misunderstandings or allegations. Any investigation of low-level concerns should be done discreetly and, on a need, to know basis. Typically, this will be the Headteacher, the Head of Safeguarding, the individual themselves and The People Team, although this will be reviewed on a case-by-case basis.

Most low-level concerns are likely to be minor concerns, and some will not give rise to any ongoing concern and accordingly, not require any further action. Others will most appropriately be dealt with by means of management guidance and/or training.

Any conversation should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what if any support they might need to achieve and maintain that, and being clear on the consequence if it fails to reach the required standard or repeat the behaviour in question.

Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment, which is agreed with the individual and regularly reviewed with them, may also be appropriate.

Some low-level concerns may raise issues of misconduct or poor performance. The Headteacher should consider whether this is the case, taking into account advice from the Head of Safeguarding and The People Team. It is important that there is close liaison and appropriate information sharing between the Headteacher, the Head of Safeguarding and Human Resources so a holistic view of the individual can be taken.

Where a low-level concern does not raise misconduct or poor performance issues, it will not be subject to a formal process however it may still need to be discussed with The People Team.

When considered with any other low-level concerns that have been shared about the same individual and the issue should be re classified as an allegation, due to the harm/risk of harm threshold being perceived to require consideration then the allegation should be dealt with in accordance with part three of this policy.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Record Keeping

Records of decisions made in relation to allegations against staff are recorded via Staffsafe which is accessible by the Headteacher, Executive Headteacher, People Operations Manager and the Head of Safeguarding. These are stored confidentially and will include a comprehensive chronology of concerns, how the matter was followed up and resolved and notes of any action taken, and decisions reached (and justification for these), both formal and informal.

Records will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Head of Safeguarding and the People Operations Manager should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider

cultural issues within the school enabled the behaviour to occur and where appropriate policies could be revised or extra delivered to minimise the risk of it happening again.

References

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that allow-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

Part Five: Safer Recruitment (Recruitment, Selection and Disclosure)

TCES are committed to leading on safeguarding and the promotion of the welfare of students, and in turn expects this of all our staff, permanent or temporary, and our volunteers. As part of this culture, we adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities within our schools and services.

Our safer recruitment practice includes those persons who may not have direct contact with children, but because of the nature of their role will be seen as safe and trustworthy.

We follow Safer Recruitment Practices to:

- Ensure that the best possible staff are recruited based on their competencies, values, abilities, and suitability, compared to the role's person specification.
- Ensure that all job applicants are considered equally and consistently, not discriminated against on any protected personal characteristic, including age, disability, gender reassignment, race, religion or belief, sex or sexual orientation as outlined in the Equality Act 2010.
- Ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance regularly reviewed and published by the Department for Education (DfE), Keeping Children Safe in Education (KCSiE) and the code of practice published by the Disclosure and Barring Service (DBS).
- Ensure that TCES meets its commitment to safeguarding and promoting the welfare of children and vulnerable adults by carrying out all pre-employment checks required by this policy.

For further details regarding Safer Recruitment procedures, please refer to TCES Recruitment & Selection Policy.

Appendix 1: Key Contacts

TCES CEO & Proprietor:

Thomas Keaney

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TCES Director of Education, Innovation & Strategy

Gerard Strong

Tel: 020 8543 7878

Gerard.Strong@tces.org.uk

TCES Executive Headteacher:

Andy Stuart

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Andy.Stuart@tces.org.uk

TCES Head of Safeguarding:

Sara Lewis

Tel: 020 8543 7878

headofsafeguarding@tces.org.uk

National Online School Headteacher

Kirsten Roy

Tel: 020 8543 7878

Kirsten.Roy@tces.org.uk

National Online School Designated Safeguarding Lead

Safiatou Bah

Tel: 020 8543 7878

Safiatou.Bah@tces.org.uk

dsl@tces.org.uk

National Online School Deputy Designated Safeguarding Leads:

Sherie Harris (Deputy Headteacher) – Sherie.harris@tces.org.uk

Ebony Lawrence (SENCO) – Ebony.Lawrence@tces.org.uk

Stephanie Lee (Provision Manager) – Stephanie.Lee@tces.org.uk

Merton MASH

020 8545 4226

020 8545 4227

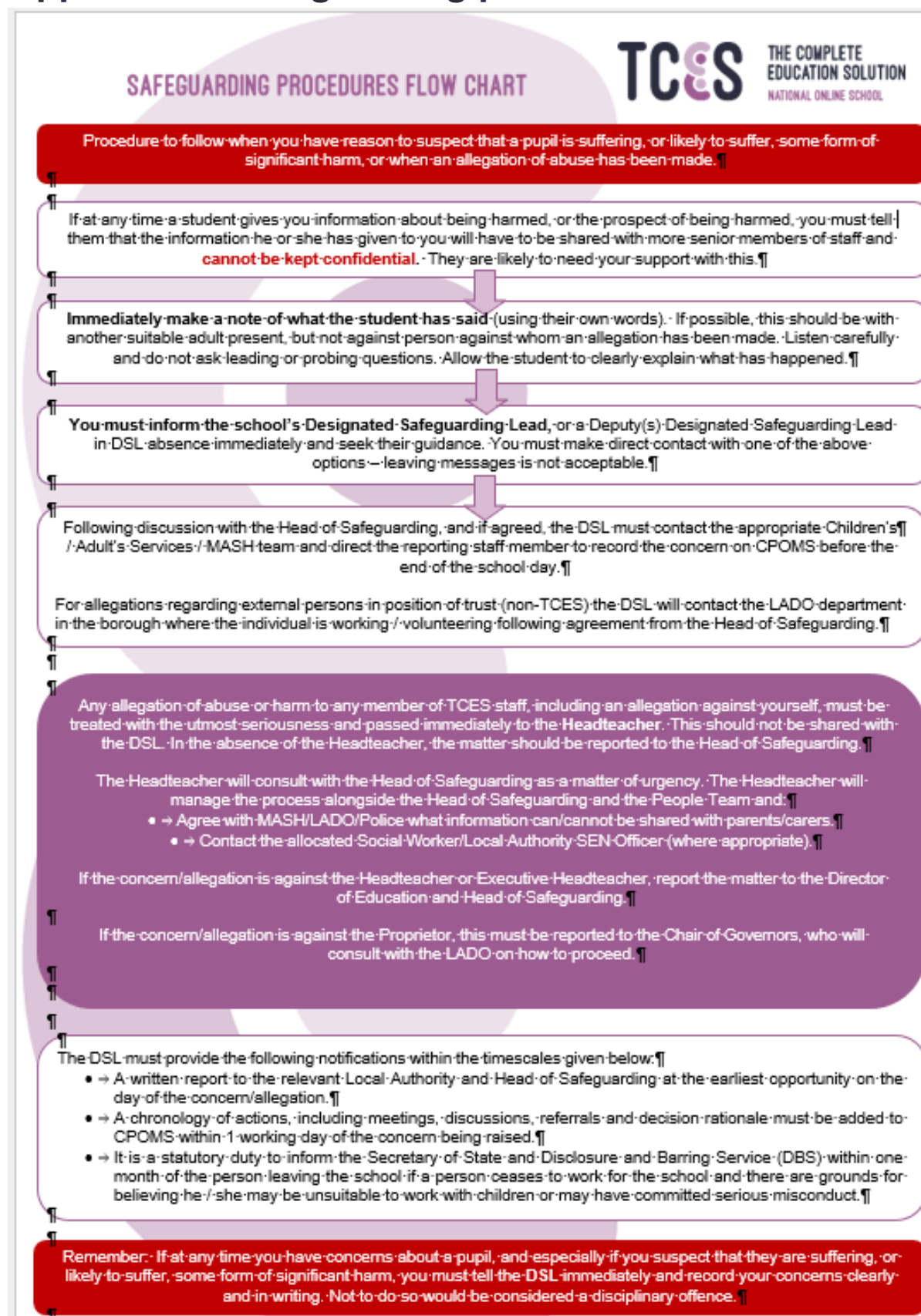
020 8770 5000 (out of hours)

MASH@Merton.gov.uk

CHILDLINE: 0800 11 11

This contact number is displayed prominently in a number of location within the school for easy access for our children. A private telephone will be made available for any child who requests to call Childline.

Appendix 2: Safeguarding procedures Flow Chart



Policy Sign Off

This policy was agreed and implemented by Thomas Keaney on behalf of TCES:

Signed:

A handwritten signature in black ink that reads "Thomas Keaney". The signature is written in a cursive style and is positioned above a horizontal line.

CEO

Date of next formal review:

September 2026