Cloud Hub
Safeguarding Policy

Policy Document Title	Safeguarding Policy
Publication Date	September 2024
Review Date	September 2025
Head of Provision	Kirsty Woolridge

This policy is available on our provision website and is available on request from the provision office.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance.

Contact information covers both Stoke-on-Trent and Staffordshire areas, as children and young people may be referred to Cloud Hub by the two local authorities.
Keeping Children Safe in Education 2024

1

Key Safeguarding Contacts

Role in provision	Name	Date and Level of safeguarding training
Head of Provision	Kirsty Woolridge	Level 3 (valid until June 2025)
DSL (DSL)		
Deputy DSL (DDSL)		

1. PURPOSE & AIMS

The purpose of the Safeguarding policy at Cloud Hub is to ensure we:

- **Are committed** – to develop a robust culture of vigilance and challenge.

- **Build resilience** – by raising awareness of safeguarding and learner protection issues, and equipping children with the language and skills to keep themselves safe.

- **Establish a safe environment** – in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.

- **Support vulnerable children** – who have been abused, have witnessed violence towards others or may be vulnerable to abuse.

- **Prevent unsuitable people** – from working with children by ensuring we practice safe recruitment in checking the suitability of **all** provision staff, supply staff and volunteers to work with our children. And to maintain an active vigilance thereafter in line with the safeguarding culture.

Our aim is to follow the procedures set out by Stoke-on-Trent Safeguarding Children Partnership, Keeping Children Safe in Education 2024 and Working Together to Safeguard Children by **knowing** and **understanding** that:

- Safeguarding and promoting the welfare of children is **everyone's** responsibility, and the **voice of the learner** is evident.
- **Everyone** who comes into contact with children and their families has a role to play.

- **Everyone** should ensure that their approach is **learner-centred** considering, at all times, what is in the **best interests of the learner.**
- By establishing **a safe environment,** we **enable** our children to learn and develop within an ethos of openness.
- **No single practitioner** can have the full picture of a learner's needs and circumstances.
- If children and families are to receive the **right help at the right time**, **everyone** who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.

- The importance of providing children with a **balanced curriculum** including PHSE, healthy relationship education, online safety, sexting, child-on-child abuse as well as 'abuse outside of the home', county lines, contextualised issues and Learner Criminal Exploitation. Also supporting this with online activities, enabling them to enhance their **safeguarding** skills and knowledge whilst **understanding the risks.**
- Undertaking the role to enable children and young people at our provision to have **best outcomes**.
- Ensuring that as a provision we have awareness of our staff's knowledge and understanding as well as embedding safeguarding, through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a **robust element** of our provision practice.

At Cloud Hub, we strive to:

- **Protect** children and young people from maltreatment.
- **Prevent** impairment of our children and young people's mental and physical health or development.
- **Ensure** that our children and young people grow up in circumstances consistent with the provisions of safe and effective care.
- **Take action** to enable **ALL** children to have the **best outcomes**.

This policy provides guidance to all adults working within the provision, whether paid or voluntary or directly employed by the provision or a third party.

- This policy is available on our provision website and is available on request from the provision office. We also inform parents/carers about this policy when their children join our provision.
- This policy sets out how the provision's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are children at this provision. Our policy applies to all staff; paid and unpaid, working in the provision.
- The policy is provided to all staff (including temporary staff, supply staff and volunteers) at the point of induction, alongside our Staff code of conduct.

- The Head of Provision ensures that those staff who do not work directly with children read either Part 1 (condensed version of KCSiE 2024) or the full Keeping Children Safe in Education (KCSiE) 2024 guidance.
- All staff who work directly with children, are provided with and read Part 1 of KCSiE 2024.
- The provision follows the Stoke-on-Trent Safeguarding Children Partnership policies and procedures: SOTSCP.
- The provision follows the Staffordshire Safeguarding Children Board policies and procedures: SSCB

2. DEFINITIONS

The definition of safeguarding and promoting the welfare of children has changed so it's now in-line with the definition in **Working Together to Safeguard Children**.

Safeguarding and **promoting the welfare of children** is defined as:

• 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.

Source: *'Keeping Children Safe in Education' (2024)*

Child Protection

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

Source: *'Working Together to Safeguard Children' (2023)*

Abuse, neglect and exploitation

Abuse is defined as a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a school/college, inside and outside of home, and online or in a family setting by those known to them or, more rarely, by others. Abuse, neglect and exploitation 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.

Abuse, neglect and exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of this environment. All staff, but especially the DSL should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL.

3. ETHOS AND CULTURE

The learner's welfare is of paramount importance at Cloud Hub.

We all have a statutory duty to safeguard and promote the welfare of children and to maintain a professional attitude of 'it could happen here' where safeguarding is concerned.

Our provision is committed to safeguarding children and promoting learner welfare and expects all staff, volunteers, and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to **act without delay** to protect children by reporting anything that might suggest a learner is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours, that underpins this commitment. The provision seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is learner centred. This means that they should consider, at all times, what is in the best interests of the learner.' (Keeping Children Safe in Education 2021)

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours and these are dealt with appropriately and robustly. Staff do not accept these behaviours as 'banter' 'having a laugh' or 'part of growing up'.

All staff are encouraged to report any concerns that they have and **not see these as insignificant.** On occasions, a referral is justified by a **single incident** such as an injury or disclosure of abuse. More often however, **concerns accumulate over time** and are evidenced by building up a picture of harm; this is particularly true in cases of emotional abuse and neglect. In these circumstances, **it is crucial that staff record and pass on concerns** in accordance with this policy to allow the DSL to build up a picture and access support for the learner at the earliest opportunity**. (See Appendix 1)**

We maintain a professional attitude of '**it could happen here'** where safeguarding is concerned. When there are concerns about the welfare of a learner, staff members will always act in the best interests of the learner. This policy has been developed in-conjunction with our provision culture of prevention, protection, and support.

Children at Cloud Hub are reassured that they have a voice, they are listened to and what they say is taken seriously. They know that they will be supported and kept safe. They are never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. We are a learner centred provision and children at our provision are encouraged to talk freely with staff if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never be made to feel ashamed for making a report.

We make every effort to listen to and capture the voice of children to enable us to have a clear understanding of their daily lived experiences.

We are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. We know children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This does not prevent our staff from having a professional curiosity and speaking to the DSL if they have concerns about a learner. Our staff determine how best to build trusted relationships with children and young people in our provision that helps facilitate communication.

When dealing with safeguarding matters, we are conscious of the language and terminology used. It is important to recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. We are conscious of this and when managing any incident, we will be prepared to use any term with which the individual learner is most comfortable.

Additionally, for the purpose of this policy, we use the term 'alleged perpetrator' and where appropriate 'perpetrator'. These are widely used and recognised; however, we will think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. The use of appropriate terminology will be determined on a case-by-case basis.

We work closely and restoratively with our safeguarding partners with the confidence to challenge decisions and practice if deemed appropriate.

We are committed to working with parents and carers in a positive, open, and transparent

way. We ensure that all parents/carers are treated with respect, dignity, and courtesy.

We recognise the stressful and traumatic nature of safeguarding and learner protection work and support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate.

Curriculum

At Cloud Hub, we make use of the DfE "one stop" page for teachers on GOV.UK, outlined within. Teaching about relationships, sex and health. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

We are familiar with the following resources to help us plan and teach about safeguarding:

- teaching online safety in provisions

- UK Council for Internet Safety (UKCIS) guidance Education for a connected world

- UKCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people

- The UKCIS external visitors guidance to ensure the maximum impact of any online safety sessions delivered by external visitors;

- National Crime Agency's CEOP education programme ThinkuKnow

- Harmful Online Challenges and Online Hoaxes this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

By using the resources above our children are taught to recognise when they are at risk and how to get help when they need it.

We provide opportunities for children to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. Relevant issues will be addressed through the curriculum, for example self-esteem, emotional literacy, assertiveness, power, exploitation, sex and relationship education, consent, e-safety, British Values, bullying and sexting. Issues will be addressed through other areas of the curriculum, for example, English, Geography, Science and Art.

Our policies address issues of power and potential harm, for example bullying, equal opportunities, physical handling, positive behaviour, online safety, SEND and are linked to ensure a whole provision approach. Our safeguarding policy cannot be separated from the general ethos of the provision, which will ensure that children are treated with respect and dignity, taught to treat each other with respect, to be honest, feel safe, have a voice, and are listened to.

4. LEGISLATION & GUIDANCE

This policy has been devised with due regard for the statutory guidance from the DfE [Keeping Children Safe in Education 2024](#) (KCSiE) and this document is read alongside:

- The Children Act 1989 and 2004

- Education Act 2002

- Dealing with Allegations of Abuse Against Teachers and Other Staff (DfE 2011)

- [Working Together to Safeguard Children 2018](#)

- [Staffordshire Childrens Advice and Support Service](#)

- [Stoke-on-Trent Safeguarding Children Partnership Board procedures](#)

- [What to do if you are Worried a Learner is being Abused-Advice for Practitioners](#)

- [Behaviour in Provisions - Advice for Head of Provisions and provision staff](#)

- [Disqualification under the Learner Care Act 2006](#)

- [Information Sharing Advice for practitioners providing safeguarding services](#)

- [NSPCC Caspar newsletters (weekly)](#)

- Linked to policies including: Anti-Bullying (including cyber bullying indicators), child-on-child abuse policy, missing children, online safety, staff code of conduct, safer recruitment, use of reasonable force and whistleblowing.

5. THE ROLE OF ALL STAFF IN KEEPING CHILDREN SAFE

All staff have read and have a good understanding of at least Part 1 of [Keeping Children Safe in Education 2024](#). They have all signed to state they have read this with their understanding checked via a knowledge quiz.

All staff are aware of the safeguarding link to other policies relating to their daily practice. This policy is read and referenced alongside other policies:

- Additional Needs policy (SEND)

- Anti-Bullying policy

- Attendance and children missing education

- Behaviour Policy

- Child on child Sexual Violence and Sexual Harassment

- Educational visits

- First aid

- Harassment and discrimination including racial abuse

- Health and Safety

- Meeting the needs of children with medical conditions

- Monitoring and supervision procedures

- Online safety – IT code of conduct – including remote learning

- Photography policy

- Recording and information sharing guidance

- Safer Recruitment & Selection

- Staff Code of Conduct

- Staff Induction procedures

- Preventing Extremism & Radicalisation guidance for provisions Sept 2015

- Use of mobile phones policy

- Vaping Policy

- Use of reasonable force (physical intervention)

- Whistleblowing

All staff receive appropriate safeguarding and learner protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and **Filtering and Monitoring Standards**) at induction and this training is regularly updated. In addition, **all** staff should receive safeguarding and learner protection (including online safety) updates (done via daily staff meetings/ briefings/emails) as required, and at least annually, to continue to provide our staff with relevant skills and knowledge to safeguard children effectively.

All staff know who the DSL/DDSL is, and as well as being the expert in this field, are there to support staff, volunteers, and Governing body.

All staff are aware of their responsibility to provide a safe environment in which children can learn.

All staff are aware of indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the provision/college, inside and outside of home and online. Staff are confident in exercising **professional curiosity** and understand that knowing what to look for is vital for the early identification of abuse and neglect to identify cases of children who may be in need of our help or protection. They are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff, but especially the DSL/DDSL consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

All staff know what to do if a learner tells them they are being abused, exploited, or neglected. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL and local authority learner's social care. Staff never promise a learner that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the learner

All staff know how to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

All staff are aware of the early help process and understand their role in it and are confident to identify and support children who may benefit from early help, effectively giving children and their families the right help at the right time.

All staff are aware of how to make a referral to learner's social care, especially section 17 (children in need) and section 47 (a learner suffering, or likely to suffer, significant harm) that may follow a referral, along with their potential role in such assessments.

All staff understand their responsibility to report concerns about the behaviour of any adult in our provision and know that they will be listened to and taken seriously.

All staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a learner's needs remain unmet or if the learner is failing to thrive and in need or if the learner is at risk of harm.

In all cases, if our staff are unsure, they know that they should always speak to the DSL/DDSL.

UNDER NO CIRCUMSTANCES WILL STAFF LEAVE THE PROVISION WITHOUT DISCUSSING SAFEGUARDING CONCERNS WITH SOMEONE.

6. THE ROLES AND RESPONSIBILITIES OF DESIGNATED SAFEGUARDING LEAD (DSL) AND DEPUTIES (DDSL)

For full details of the DSL/DDSL roles and responsibilities please refer to Part 2 & Annex C of [Keeping Children Safe in Education 2024](#).

Our DSL/DDSL(s) have received the appropriate safeguarding training to provide them with

an understanding of their role and the knowledge and skills to carry it out. Our DDSL(s) are trained to the same level as the DSL. Training received also supports their knowledge of the processes, procedures, and responsibilities of other agencies, particularly learner's social care in line with Working Together to Safeguard Children 2018. This training is updated at least every 2 years and in addition to this they regularly (at least annually) refresh and update their knowledge and skills. The DSL is given **additional** time, funding, training, resources, and support needed to carry out the role effectively. Staff are also part of local Education Safeguarding DSL Briefings, attend network meeting with other DSLs at forums/MAT meetings, ensure they are up-to-date with emails and are reading statutory guidance.

Our DSL takes the lead responsibility for safeguarding and learner protection (including online safety as well as an understanding of the expectations, applicable roles and responsibilities in relation to the filtering and monitoring systems and processes in place), and this is explicit in their job description.

Guidance:
Filtering and monitoring standards for provisions and colleges

As part of online safety, we are aware of our responsibility for information security and access management, and we will ensure that we have the appropriate level of security protection procedures in place in order to safeguard our systems, staff and children and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Guidance:
Cyber security standards for provisions and colleges
Cyber Security Training for Provision staff

During term time, the DSL/DDSL is available (during provision hours) for staff in the provision to discuss any safeguarding concerns. The DSL can delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated. In the absence of the DSL the DDSL(s) will take a lead on safeguarding with clear direction from the Senior Leadership Team.

The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly and shared appropriately.

Our DSL maintains robust systems to monitor and record training of **all** staff and update and refresher time scales are evident within the training record. Training is delivered in-line with SOTSCP and KCSIE 2024. This will include bulletins, daily briefings, and inset day training as well as external events attended. In addition, staff also complete training via the online training course on TES Educare. This knowledge is tested via the test completed after each session, with the training matrix updated.

The DSL ensures that **all** staff and regular visitors have appropriate safeguarding training to

equip them for their role in provision. This includes training on how to recognise indicators of concern, how to respond to a disclosure from a learner and how to record and report this information accurately. The DSL ensures that systems in place to induct new staff/governors are robust and monitored and any non-compliance shared with Senior Leadership Team/Governing body.

The DSL monitors the paper case management systems. A paperwork system is in place to record concerns about children, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the [Data Protection Act 2018](#) and General Data Protection. The safeguarding and learner protection records are kept in a secure location, away from academic records and there is a clear recording process of transfer, in or out, which if paper file transfer, using the transfer of records form which is signed by the sending and receiving settings and a copy of this form kept by both.

When a parent chooses to remove their learner/ren from provision to receive EHE (Elective Home Education), the DSL will pass on any safeguarding concerns and the safeguarding file if there is one, to the EHE Team within Stoke-on-Trent City Council, email: electivehomeeducationservice@stoke.gov.uk or refer to EWO where a learner has been missing education more than 5 days.

All paper safeguarding files have a front sheet, a chronology in addition to all other safeguarding paperwork in date order with the most recent at the front of the file. All concerns, discussions and decisions made, and the reasons for those decisions, are recorded within the safeguarding file.

The DSL/DDSL monitors the quality of safeguarding files through auditing case files regularly. Appropriate and regular supervision takes place with the DSL and may be extended to other members of staff if we deem this appropriate. Staff wellbeing is monitored daily via 1-to-1 meetings to ensure staff are OK and are aware they can talk to SLT whenever they feel the need.

All staff at Cloud Hub are also members of the online reward/benefits system, 'Perkbox' which has an 'employee assist programme', and also AXA Health.

The DSL/DDSL will refer cases of suspected abuse to the local authority learner's social care, as required, and support other staff to make these referrals. We understand the importance of attending case conferences and core group meetings as well as Learner in Need meetings.

DSL will liaise with all staff (e.g., pastoral staff, provision nurses, attendance staff, SEN staff and Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

DSL will be aware of children who have a social worker and the DSL/DDSL will represent provision at learner protection conferences and core group meetings and will be the expert within our setting to support staff in liaising with other agencies, making assessments and any referrals. Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of learner/ren. The DSL/DDSL will notify learner's social care if a learner with a learner protection plan is absent for more

than two days without explanation.

The DSL/DDSL helps to promote educational outcomes by sharing appropriate information about the welfare, safeguarding and learner protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and provision leadership staff. Their role could include ensuring that the provisions and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

The DSL liaises with the Head of Provision to inform them of any issues – especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult.

7. OUR HEAD OF PROVISION

At Cloud Hub, we have a strategic leadership responsibility for safeguarding arrangements, and they **must** ensure that we comply with our duties under legislation. They **must** have regard to this guidance in ensuring policies, procedures and training are effective and comply with interagency working and the law at all times. See Keeping Children Safe in Education 2024 and Working Together to Safeguard Children 2023

The Head of Provision ensures that the policies and procedures, adopted by the governing bodies and Head of Provision (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff. These policies are transparent, clear, and easy to understand for staff, children and their parents/carers.

The Head of Provision ensures that all staff receive appropriate safeguarding and learner protection training (including online which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction and that this is regularly updated and in line with any advice from the safeguarding partners.

This training will equip all staff with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place here are effective and support the delivery of a robust whole provision approach to safeguarding and this training is regularly updated.

In considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our Head of Provision will ensure that our provision has appropriate filters and monitoring systems in place. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The Head of Provision will review the following standards and discuss with IT staff and service providers what more needs to be done to support our setting in meeting this standard:

- identify and assign roles and responsibilities to manage filtering and monitoring systems;

- review filtering and monitoring provision at least annually;

- block harmful and inappropriate content without unreasonably impacting teaching and learning;

- have effective monitoring strategies in place that meet their safeguarding needs.

Guidance:

[Filtering and monitoring standards for provisions and colleges](#)

The Governing Body are also aware of their responsibility to ensure that there is the appropriate level of security protection procedures are in place in order to safeguard systems, staff and children and that there is the need to review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Guidance:

[Cyber security standards for provisions and colleges](#)

[Cyber Security Training for Provision staff](#)

The Head of Provision is aware of their obligations under the [Human Rights Act 1998](#), the [Equality Act 2010](#), (including the [Technical Guidance on the Public Sector Equality Duty](#)), and their local multi-agency safeguarding arrangements. Further guidance is found on Pages 24-26 Para 82-93 [Keeping Children Safe in Education 2024](#) & [Equality Act 2010-Advice for provisions](#).

The Head of Provision facilitates a whole provision approach to safeguarding involving everyone in provision, ensuring that safeguarding is at the forefront and underpins all relevant aspects of process and policy development. These systems, processes and policies operate with the **best interests** of our children at their heart of what we do.

The Head of Provision has appointed the DDSL who takes lead responsibility for safeguarding and learner protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). This is explicit in their job description, and they ensure that the DDSL understands their responsibility in leading safeguarding across the provision. They also ensure that the DDSL is given additional time, funding, training, resources, and support needed to carry out the role effectively. See Annex C [Keeping Children Safe in Education 2024.](#)

The Head of Provisions ensure that children are taught about how to keep themselves and others safe, including online. It is recognised that effective education will be tailored to the

specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. There is an expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.

The following is a resource: - Teaching about relationships, sex and health and there are more listed in Annex B KCSiE including Harmful online challenges and online hoaxes

Our Head of Provision, whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, are doing all that they reasonably can to limit learner's exposure to the online risks from the provision's IT system. As part of this process, our governing body and Head of Provisions ensure that our provision has appropriate filters and monitoring systems in place and regularly review their effectiveness. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The Head of Provision considers the age range of our children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

Where applicable, the Head of Provision will ensure compliance with the completion of the Section 175/157 audit return to the Local Authority and that any areas of concern in safeguarding are identified and a safeguarding action plan is developed. Our provision also completes a trust wide safeguarding audit however this audit compliments and does not replace the statutory return to the local safeguarding partnership.

The Head of Provision ensure that those involved with the recruitment and employment of staff to work with children have received safer recruitment training and are compliant with safer recruitment procedures. This includes the requirement for appropriate checks to be carried out in line with national guidance. When candidates have been shortlisted, they will be made aware that online searches will be carried out. See Part 3 Safer Recruitment Keeping Children Safe in Education 2023

Our Head of Provision has ensured that there is a current whistleblowing policy and staff are aware of this policy and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures

Further guidance on whistleblowing is available here and the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: help@nspcc.org.uk

When the Head of Provision hires/rents out provision or college facilities/premises to organisations or individuals (e.g. community groups, sports associations, and service providers to run community or extra-curricular activities), they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the Head of Provision under the direct supervision or management of their provision or college staff, their arrangements for learner protection will apply. However, where services or activities are provided separately by another body, this is not necessarily the case.

The Head of Provision will seek assurance that the provider concerned has appropriate safeguarding and learner protection policies and procedures in place, including inspecting these as needed and ensure that there are arrangements in place for the provider to liaise with the provision or college on these matters where appropriate.

The Head of Provision will ensure that safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Guidance:

[Keeping Children Safe in out-of-provision settings](#)

Designated Teacher

The Head of Provision has appointed a Designated Teacher (DT) and this teacher works with the local authority and parents/carers to promote the educational achievement of registered children in our setting, who are looked after or who have left care through adoption, special guardianship, learner arrangement orders or who were adopted from state care outside of England and Wales.

Our Designated Teacher**(s)** work across the provision to promote and improve educational outcomes for using evidence-based interventions. They are appropriately trained and have the relevant qualifications, training, and experience.

At Cloud Hub, we are attachment aware, trauma informed and take a relational based approach to supporting our most vulnerable children and will work restoratively with children to improve their outcomes.

The Designated Teacher works with the Virtual Provision, to provide the most appropriate support, utilising the learner premium plus, to ensure that they meet the needs identified in the learner's Personal Education Plan (PEP). They also work with the virtual provision head, to promote the educational achievement of previously looked after children.

Our provision will admit any children in care without delay and work restoratively avoid exclusions for our most vulnerable children. We will make reasonable adjustments to our Behaviour Policy to support children in care and contact the Virtual Provision when a learner is at risk of exclusion. Where a short period of exclusion is unavoidable, we will provide 1st day provision.

We are aware of the additional duties of the virtual provision Head of Provision extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the

educational attendance, attainment, and progress of children with a social worker. We understand the role that we play in improving outcomes for children with a social worker.

[Virtual Head of Provision Role-Children with a social worker](#)

7. WORKING WITH PARENTS/CARERS

At Cloud Hub, we are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area.

When new children join our provision, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the provision website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with learner protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a learner from harm.

We will seek to share with parents/carers any concerns we may have about their learner before making a referral, unless to do so may place a learner at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the provision has about a learner will not prevent the DSL making a referral to the relevant local authority in those circumstances where it is appropriate to do so.

To keep children safe and provide appropriate care for them, the provision requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the learner normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and **at least 2 contacts.**
- Full details of any other adult authorised by the parent to collect the learner from provision (if different from the above).
- Any legal or criminal changes which effects parental responsibility e.g. bail condition, court orders, Special Guardianship orders, Learner Arrangement orders etc.

The provision will retain this information on the learner file. The provision will only share information about children with adults who have parental responsibility for a learner or where a parent has given permission and the provision has been supplied with the adult's full details in writing.

We recognise that we are likely to be in regular contact with parents and carers. We will use these communications to reinforce the importance of children being safe online and

parents/carers are likely to find it helpful to understand what systems provisions use to filter and monitor online use. It will be especially important for parents/carers to be aware of what their children are being asked to do online, including the sites they will ask to access and be clear who from the provision (if anyone) their learner is going to be interacting with online.

At Cloud Hub, we update parents about safeguarding through text messages with links to newsletters, the provision website, and the notice board in reception

8. STOKE-ON-TRENT / STAFFORDSHIRE EARLY HELP

Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

Any learner may benefit from Early Help, but **ALL** provision staff are particularly alert to the potential need for early help for a learner who: -

- is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care plan)

- has a mental health need

- is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

- is frequently missing/goes missing from education, home or care

- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit

- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

- is at risk of being radicalised or exploited

- has a parent or carer in custody, or is affected by parental offending

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

- is misusing alcohol and other drugs themselves

- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

- is a privately fostered child.

The DSL ensures that **all** staff are aware of the early help process and understands their role in it. This includes identifying emerging problems, liaising with the DSL/ DDSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Guidance documents can be accessed at the following links:

- Stoke-on-Trent Early Help
- Stoke-on-Trent Threshold Document
- Staffordshire Early Help

Concerns about a learner should always lead to help for a learner. The provision may need to escalate it's concerns with Learner's Services to ensure a referral is accepted or work with other agencies to ensure that an Early Help Assessment is completed.

9. WHAT HAPPENS AFTER A REFERRAL IS DEEMED NECESSARY TO ESCALATE BEYOND EARLY HELP (STOKE-ON-TRENT).

Learner in Need (Section 17)

If the DSL considers that the welfare concerns indicate that a Learner in Need referral is appropriate, they will speak with parents/learner and obtain their consent for referral to Stoke-on-Trent Learner's Advice & Duty (ChAD) service or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the learner's needs are not being met, the DSL will discuss these issues with the Stoke-on-Trent Learner's Advice and Duty (ChAD) service on 01782 235100. Appropriate provision staff should be invited to participate in Learner in Need (CIN) meetings convened by Learner's Social Care when children are deemed to require Section 17 services.

Learner Protection (Section 47)

If the local authority has reasonable cause to suspect that a learner is suffering, or likely to suffer, significant harm, they have a duty to make enquires under Section 47 to enable them to decide whether they should take any action to safeguard and promote the learner's welfare.

This duty also applies if a learner is subject to an emergency protection order (under section 44 of the Children Act 1989) or in police protective custody under section 46 of the Children Act 1989.

Learner's Services will convene an Initial Learner Protection Conference (ICPC) once a learner protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the learner is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once a learner has been made the subject of a Learner Protection Plan

to monitor the safety of the learner and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the learner protection plan.

The DSL, and sometimes other staff members, will attend a learner protection conference on behalf of the provision in respect of individual children.

The person attending will have as much relevant and up to date information/case files about the learner as possible; any member of staff will be required to contribute to this process. The person attending will contribute to a recommendation on the risks/protective factors for the family from their information and a view on the need for a learner protection plan. If we cannot attend, then we ensure that a report is sent prior to the conference.

Learner protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open, honest, and transparent way with any parent whose learner has been referred to Stoke-on-Trent Learner's Advice and Duty service or whose learner is subject to a learner protection plan.

10. ESCALATION PROCEDURE (STOKE-ON-TRENT).

Stoke-on-Trent Safeguarding Children Partnership expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies and between agencies provides a healthy approach to the work.

If we believe that concerns regarding a learner are not being addressed, we understand the expectations that we will commence the escalation process in accordance with SOTSCP Escalation Policy 2022 be used until a satisfactory conclusion is reached. When we use professional challenge and/or the escalation process we will set out clearly what we want to achieve as a result of the challenge/escalation, what we expect to happen and the desired outcome.

The process of resolution will be kept as simple as possible and the aim will be to resolve difficulties at a professional practitioner level, wherever possible and always in a restorative way. We recognise that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the DSL/DDSL.

11. A SAFER PROVISION CULTURE

At Cloud Hub, we pay full regard to Keeping Children Safe in Education 2024. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and

physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks, prohibition checks, S128 checks where appropriate and whether they are known to the police and/or social care, if they have been disqualified from providing learner care and any relevant overseas information. Evidence of these checks is recorded on our Single Central Record.

Staff who have lived or worked outside the UK **will** undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Guidance:

Application process for criminal records checks overseas

Regulated professions database

UK Centre for Professional Qualifications

Separate barred list checks are only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 have been carried out); or,

- where an individual has worked in a post in a provision or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as above have been carried out).

All recruitment materials will include reference to the provision's commitment to safeguarding and promoting the wellbeing of children, and make it clear that checks will be undertaken with applicants asked to sign a declaration confirming the information they have provided is true.

Relevant staff (including at a minimum the Head of Provision and the Head of Provision) have undertaken appropriate training in Safer Recruitment.

One of the above will be involved in **all** staff and volunteer recruitment processes and sit on the recruitment panel.

Our provision does not accept copies of curriculum vitae in place of an application form.

Induction

All staff must be aware of systems within their provision or college which support safeguarding, and these should be explained to them as part of staff induction. This should include:

- The Safeguarding policy.

- The behaviour policy.

- Child-on-child Abuse Policy

- The staff behaviour policy (sometimes called a code of conduct).

- The safeguarding response to children who go missing from education; and

- The role of the DSL (including the identity of the DSL and any deputies).

- At least part one of KCSIE 2024.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in provision, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open. No visitors, volunteers or parent helpers are ever to be left unsupervised with children or out of sight of the teacher or member of staff in charge. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff Support

We recognise the stressful and traumatic nature of safeguarding and learner protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate.

Regular supervision will be offered to the Lead DSL within provision, at least half-termly and may be extended to other members of staff, as deemed appropriate by the provision.

Use of reasonable force

There are circumstances when it is appropriate for staff in provision to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a learner to safety by the arm, to more extreme

circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between children or blocking a learner's path, or active physical contact such as leading a learner by the arm out of the classroom. Departmental advice for provisions is available [here](#).

When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force.

12. KEEPING CHILDREN SAFE IN EDUCATION 2024 - SPECIFIC SAFEGUARDING ISSUES.

All staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make children vulnerable and put them in danger and that often these issues overlap. Please read and refer to Appendix 2 for additional information and guidance on the below topics.

- Abuse (incl. Physical/Emotional/Sexual/Neglect)
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child-on-child abuse (incl. sexual violence and sexual harassment/sexting-sharing of nude/semi-nude images & upskirting)
- Children and the court system
- Children missing from education
- Children who are absent from education
- Learner missing from home or care
- Learner Criminal Exploitation (CCE)
- Learner sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness

- Faith abuse

- Female genital mutilation (FGM)

- Forced marriage

- Gangs and youth violence

- Gender-based violence/violence against women and girls (VAWG)

- Homelessness

- Mental health

- Online safety

- Private fostering

- Preventing radicalisation

- Prevent Duty and Channel

- Serious violence

- Trafficking

For further information, advice and guidance on these issues please see Appendix 2 of this document.

13. CHILDREN POTENTIALLY AT A GREATER RISK OF HARM

All children should be protected however our staff and Governing Body recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups:

- Children who need a social worker (Learner in Need & Learner Protection)

- Children missing from education

- Elective Home Education (EHE)

- Children requiring mental health support

- Looked after children and previously looked after children

- Children with special educational needs & disabilities/health issues

- Children who are lesbian, gay, bi or trans (LGBT)

Heightened vulnerability may be linked to:

- Communications skills

- Maturity (Lower cognitive ability)

- Perceptions of intent from others

- Lower self-esteem/confidence

- Potential to trust unreservedly

- A need to have "friends" or find a partner

- Differing boundaries

- Online safety – digital technology understanding

A **combination** of these factors can make them more susceptible to risks.

Children develop and mature at different rates, so what appears to be worrying for a younger learner might be normal behaviour for an older learner. Parental behaviours may also indicate learner abuse or neglect, so you should also be alert to parent/learner interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol, if there is a sudden change in their mental health or if domestic abuse is present. By **understanding the warning signs**, you can respond to problems as early as possible and provide the right support and services for the learner and their family.

Children say they need:

- **Vigilance**: to have adults notice when things are troubling them

- **Understanding and action**: to be heard and understood; and to have that under-standing acted upon.

- **Stability**: to be able to develop an on-going stable relationship of trust with those helping them.

- **Respect**: to be treated with the expectation that they are competent, rather than not.

- **Information and engagement**: to be informed about and involved in procedures, de-cisions, concerns and plans.

- **Explanation**: to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative.

- **Support:** to be provided with support in their own right as well as a member of their family.

- **Advocacy**: to be provided with advocacy, to assist them in putting forward their views.

Alternative Provision

At Cloud Hub we know that the cohort of children in our provision often have complex needs and our Head of Provision is aware of this additional risk of harm that their children may be vulnerable to.

DfE Guidance

- [Alternative provision](#)

- [Education for children with health needs who cannot attend provision](#)

14. EDUCATIONAL VISITORS TO THE PROVISION

We will undertake risk assessment and use professional judgement and experience when deciding whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.

- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.

- Whether the role is eligible for an enhanced DBS check

- We will clearly have decided the level of supervision required through risk assessment – the supervision will be "reasonable in all the circumstances to ensure the protection of children" as stated in KCSIE 2022

We have clear visitor's procedure that enables us to offer learner experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether they are supervised or unsupervised within the provision.

15. MANAGING ALLEGATIONS AGAINST ALL STAFF, INCLUDING SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS (Appendix 5)

Our aim is to provide a safe and supportive environment securing wellbeing and best possible outcomes for the children at Cloud Hub. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

The Governing Body ensures that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, supply staff, volunteers, and contractors.

- Allegations that may meet the harms threshold.

- Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

Allegations that may meet the harms threshold

We follow and give due regard to Part 4 of [Keeping Children Safe in Education 2024](#) guidance and [SOTSCP Allegations of abuse made against a person working with children](#) where it is

alleged that anyone working in our education setting providing education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a learner or may have harmed a learner and/or;

- possibly committed a criminal offence against or related to a learner and/or;

- behaved towards a learner or children in a way that indicates he or she may pose risk of harm to children; and/or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This relates to members of staff, supply staff, volunteers, and contractors, who are currently working in any education setting, regardless of whether the provision or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police.

Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Governing body/Head of Provision will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the provision, whilst they carry out their investigation.

If an allegation is made or information is received about an adult who works at Cloud Hub indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Head of Provision. If it is about the sole Head of Provision of the provision, then this needs to be raised with the Designated Officer.

If neither the Head of Provision nor Head of Provision is contactable on that day, the information must be passed to and dealt with by the member of staff acting as Head of Provision.

The Head of Provision or Chair of Governors will seek advice from the Local Authority Designated Officer (LADO) within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO (Tel. 01782 235100) or Staffordshire Children's Advice and Support (SCAS) – (Tel. 0300 111 8007).

Learning lessons

It is important that lessons are learnt when managing all levels and types of allegations. The Head of Provision/case manager at Cloud Hub will review the circumstances of all substantiated cases with LADO to determine whether improvements can be made to the setting procedures to help prevent similar events in the future. This will be done throughout the entirety of the process and at conclusion.

Lessons will also be learnt from the use of suspension when the individual is subsequently

reinstated. The LADO and case manager will consider how future investigations of a similar nature could be carried out without suspending the individual.

Where an allegation is concluded to be either unfounded, false, malicious or unsubstantiated the Head of Provision/case manager (and if they have been involved the LADO) will consider the facts of each case and determine whether any lessons can be learned, and improvements made.

<u>Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.</u>

We promote an open and transparent culture in which **all** concerns about adults are dealt with promptly and appropriately. This enables us to identify concerning, problematic or inappropriate behaviour early; minimising the risk of abuse; and ensuring that adults working in or on behalf of Cloud Hub are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

Low level does not mean that the concern is insignificant, it means that the behaviour towards a learner does not meet the harms threshold. Low level concern is still a 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 provision or college may have acted in a way that

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

- and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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 provision policy.

- engaging with a learner on a one-to-one basis in a secluded area or behind a closed door; or,

- using inappropriate sexualised, intimidating, or offensive language

- humiliating children.

All staff have a good understanding of what constitutes a low-level concern, and our governing body ensure that these low-level concerns are included as part of our staff code of conduct and safeguarding policies as set out in Part two of KCSiE 2024.

Sharing low-level concerns

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings.

Any member of staff or volunteer who does not feel confident to raise any concerns, including low-level, with the Head of Provision or Chair of Governors should contact **the LADO directly on 01782 235100 (Stoke) / Staffordshire Children's Advice and Support (SCAS) – (Tel. 0300 111 8007).** Further guidance on whistle blowing can be found at this link.

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

The Provision has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a learner, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our provision, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service.

16. INFORMATION SHARING

We work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with Working Together to Safeguard Children 2018 and Information sharing advice for safeguarding practitioners Our setting works closely with Stoke and Staffordshire Learner's Social Care and, where appropriate, any placing local authority.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting learner's welfare, including their educational outcomes. Provisions and colleges have clear powers to share, hold and use information for these purposes.

As part of meeting a learner's needs, our Head of Provision recognises the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with the three safeguarding partners, other organisations, agencies, and practitioners as required.

We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a learner is already known to the local authority learner's social care.

Our Head of Provision is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Our Head of Provision will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

Where children leave our provision, the DSL will ensure that any relevant Learner Protection file is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

In addition to the learner protection file, our DSL will also consider if it would be appropriate to share any information with the new provision/college in advance of the learner leaving. For example, information that would allow the new setting to continue supporting the victims of abuse and have that support in place for when the learner arrives.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Guidance documents:

- [Data Protection: Toolkit for provisions](#)

17. MANAGING COMPLAINTS

As a provision we encourage children and families to raise compliments, concerns or comments and have a robust internal investigation process.

The compliment, comment, or complaint policy states clearly the stages of complaints and where to escalate concerns following completion and outcome of process. Our complaints policy is on our provision website for parents/carers to access and is also available on request.

Safeguarding concerns should be raised with provision immediately. If a concern means a learner is **at immediate risk, the individual needs to contact Stoke-on-Trent Learner's Advice and Duty (ChAD) service on 01782 235100 / Staffordshire Children's Advice and Support (SCAS) – (Tel. 0300 111 8007).** All visitors are given safeguarding information which outlines how to share concerns and code of conduct expected by visitors/contractors. This is displayed on our posters around Cloud Hub.

18. SITE SECURITY

At Cloud Hub, we provide a secure site. but the site is only as secure as the people who use it. All people on the site must adhere to the rules which govern it. Laxity can cause potential problems with safeguarding, therefore: -

- Gates are kept closed during the provision day; visitors gain access through the main entrance.

- Visitors, volunteers, and students must only enter through the main entrance and after signing in at the office will be issued with a provision lanyard or visitor's pass. Provision has a clear system of ensuring staff are accompanied/ supervised by regulated staff member. Any visitor on site who is not identifiable by a visitor's pass will be challenged by any staff member and this will be reported to a member of the Senior Leadership Team.

- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate provision events.

- Children will only be allowed home with adults with parental responsibility or confirmed permission.

- Empty classrooms should have closed windows and doors.

- Children should never be allowed to leave provision alone during provision hours unless collected by an adult such as a parent who is doing so for a valid reason. They should report to the office to do this.

- Two members of staff are always on duty at break times.

- A health and safety audit is completed annually with risk assessment/safety planning. This will include a fire evacuation and evacuation. Prevent risk assessment.

- The risk management of site security is managed by senior leadership - we have a clear system of risk assessments and review timescales of these.

Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.

We all have a statutory duty to safeguard and promote the welfare of children, and at our provision we take this responsibility seriously.

If you have any concerns about a learner or young person in our provision, you must share this information immediately with our DSL (**Kirsty Woolridge**) or Deputy DSL (**Kirsty Woolridge**).

Do not think that your worry is insignificant if it is about hygiene, appearance, or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to learner protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the DSLs and provide them with a written/electronic record of your concern. A copy of the form to complete is attached to this and others can be obtained from Kirsty Woolridge. Please ensure you complete all sections as described.

If you are unable to locate them, ask a member of the provision office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a learner's foster carer or a volunteer should be reported immediately to the Head of Provision. If an allegation is made about the Head of Provision, you should pass this information to the Head of Provision. Alternatively, you can contact the Local Authority Designated Officer on 01782 235100.

The people you should talk to in provision are:

DSL: Kirsty Woolridge

Contact Number: **07706 862061**

Safeguarding Induction Checklist

Name:		Date:	

DAY 1:

Criteria	**Comments**	**Signature**
Welcome		
Employment Checks Complete		
Provision Background information: Children, Ofsted, Community/Special		
Provision Structure		
Keeping Children Safe in Education, Part 1 issued and explained		
Provision Ethos explained		
Role & Responsibility: reporting structure, Safeguarding role in provision		
Name of DSL, role described and contact details		
Staff Conduct of Code Policy Behaviour Policy Children Missing from education process		
Confidentiality and breaches		
General Data Protection Act		
Health & Safety: Fire procedures and Fire officers (review date)		

WEEK 1:

Criteria	Comments	Signature
Meet with Head of Provision		
Physical Intervention Leads Other leads: CSE/Prevent/LAC/SENCO/IT lead		
Pastoral Support Officers/ behaviour/ attendance		
Alternatives to reporting in provision in an emergency		
Signs and types of Abuse		
Where to find safeguarding policy		
What to do regarding disclosure – reporting systems		
Policies to read: Health & Safety Complaints Safeguarding Child on child abuse policy Code of Conduct Whistle Blowing KCSIE (part 1 or 2) Online Safety Prevent Site Security Behaviour Other:		

WEEK 2:

Criteria	Comments	Signature
Training needs identified		
Training needs scheduled		
Any other issues		
Review date:		

Date Induction carried out on:

By:

Signed by Employee:

Date of Completion:

Areas to follow up:

Training needs Identified:

Definitions and Indicators of Abuse

Abuse: A form of maltreatment of a learner. Somebody may abuse or neglect a learner by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another learner or children.

Safeguarding incidents and/or behaviours can be associated with factors outside the provision/college. Our staff, especially the designated safeguarding lead will be considering the context of such incidents and/or behaviours. Such contextual safeguarding means our assessments of children will consider whether wider environmental factors are present in a learner's life that are a threat to their safety and/or welfare.

Additionally, Learner's Services assessments should consider where children are being harmed in contexts outside the home, so it is important that we provide as much information as possible as part of the referral process. This allows

any assessment to consider all the available evidence and enable a contextual

approach to address such harm.

https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding

Neglect

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.

- Often poorly or inappropriately clad for the weather.

- Poor provision attendance or often late for provision.

- Poor concentration.

- Affection or attention seeking behaviour.

- Illnesses or injuries that are left untreated.

- Failure to achieve developmental milestones, for example growth, weight.

- Failure to develop intellectually or socially.

- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.

- The learner is regularly not collected or received from provision; or

- The learner is left at home alone or with inappropriate carers.

- Adolescent neglect.

- Affluent neglect.

Physical Abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.

- Bruises that carry an imprint, such as a hand or a belt.

- Bite marks.

- Round burn marks.

- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.

- An injury that is not consistent with the account given.

- Changing or different accounts of how an injury occurred.

- Bald patches.

- Symptoms of drug or alcohol intoxication or poisoning.

- Unaccountable covering of limbs, even in hot weather.

- Fear of going home or parents being contacted.

- Fear of medical help.

- Fear of changing for PE.

- Inexplicable fear of adults or over-compliance.

- Violence or aggression towards others including bullying; or

- Isolation from peers.

Sexual Abuse

Involves forcing or enticing a learner or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the learner is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a learner in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.

- Anal or vaginal discharge, soreness, or scratching.

- Reluctance to go home.

- Inability to concentrate, tiredness.

- Refusal to communicate.

- Thrush, persistent complaints of stomach disorders or pains.

- Eating disorders, for example anorexia nervosa and bulimia.

- Attention seeking behaviour, self-mutilation, substance abuse.

- Aggressive behaviour including sexual harassment or molestation.

- Unusual compliance.

- Regressive behaviour, enuresis, soiling.

- Frequent or open masturbation, touching others inappropriately.

- Depression, withdrawal, isolation from peer group.

- Reluctance to undress for PE or swimming; or

- Bruises or scratches in the genital area

We understand that staff need support when managing cases of sexual abuse and will access materials from CSA Centre of Expertise on Learner Sexual Abuse which has free evidence-

based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of learner sexual abuse.

Supporting Practice in tackling learner sexual abuse

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a learner such as to cause severe and persistent adverse effects on the learner's emotional development. It may involve conveying to children 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 learner 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. These may include interactions that are beyond the learner's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the learner participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The learner consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.

- Over-reaction to mistakes.

- Delayed physical, mental, or emotional development.

- Sudden speech or sensory disorders.

- Inappropriate emotional responses, fantasies.

- Neurotic behaviour: rocking, banging head, regression, tics and twitches.

- Self-harming, drug, or solvent abuse.

- Fear of parents being contacted.

- Running away.

- Compulsive stealing.

- Appetite disorders - anorexia nervosa, bulimia; or

- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as "traumatic mutism") can indicate maltreatment.

Response from Parents/Carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed.

- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).

- Incompatible explanations offered, several different explanations or the learner is said to have acted in a way that is inappropriate to her/his age and development.

- Reluctance to give information or failure to mention other known relevant injuries.

- Frequent presentation of minor injuries.

- A persistently negative attitude towards the learner.

- Unrealistic expectations or constant complaints about the learner.

- Alcohol misuse or other drug/substance misuse.

- Parents request removal of the learner from home; or

- Violence between adults in the household.

- Evidence of coercion and control.

Children with Additional Needs and/or disabilities

At Cloud Hub, we understand that children and young people with special educational needs and disabilities may face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration;

- children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs; and

- difficulties may arise in overcoming communication barriers.

When working with children with disabilities staff are aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant learner such as the shin, might be of concern on a non-mobile learner;

- Not getting enough help with feeding leading to malnourishment;

- Poor toileting arrangements;

- Lack of stimulation;

- Unjustified and/or excessive use of restraint;

- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;

- Unwillingness to try to learn a learner's means of communication;

- Ill-fitting equipment. for example, callipers, sleep boards, inappropriate splinting;

- Misappropriation of a learner's finances; or

- Inappropriate invasive procedures.

Specific safeguarding and issues of additional vulnerability

Behaviours linked to safeguarding issues

All staff have an awareness of safeguarding issues that can put children at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Bullying, including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Guidance on bullying can be:

[Preventing & tackling bullying](#)

[Cyberbullying advice](#)

Children and the Court

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

Making learner arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

We will recognise these vulnerabilities and offer early help where necessary for the children, young people and their families to safeguard emotional wellbeing; we will access resources as defined in Keeping Children Safe in Education Sept 2022.

Child on child abuse (incl. sexual violence and sexual harassment)

All staff have the knowledge and awareness that children are capable of abusing other children (including online). All staff are clear about this provision's policy and procedure regarding child-on-child abuse. We have a separate Child-on-child Abuse Policy in addition to anti-bullying and behaviour policies to guide, inform and support children, staff and parents/carers.

Child-on-child abuse can occur, both physically and verbally, either online or face to face, between two children of **any** age and sex, with a single learner or group of children and can happen both inside and outside of our setting. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

All staff at Cloud Hub recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports of it. They understand the importance of the **timely** challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of:

- Making clear that child-on-child abuse including sexual violence and sexual harassment, is never acceptable and that that we have a zero-tolerance approach.

- Not dismissing this abuse as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

All staff know that if we do not challenge and support our children that this will lead to a **culture** of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a learner is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that our children feel confident to knowing their concerns will be treated seriously.

What we can do at Cloud Hub...

We create a healthy, safe environment based on equality and informed choice allowing children to know their rights and responsibilities, what to do if they are unhappy with something and what it means to freely give informed consent.

Staff and students should treat each other with respect and understand how their actions affect others. Staff and students should feel able to openly discuss issues that could motivate child-on-child abuse. We make it clear that the provision has a zero-tolerance, whole-setting approach, e.g. harmful behaviours will not be passed off as "banter"," just growing up", etc.

Issues that might provoke conflict later should be addressed early. Our reporting systems are promoted widely, easily understood, easily accessible and inspire confidence in children and young people. This is done during session time, 1-to-1 chats and displayed on posters around the provision.

We understand our local community and the context in which children and young people at the provision are growing up. Read more about contextual safeguarding here.

Ensure children and young people know the risks – we discuss child-on-child abuse in an age/ability-appropriate way. We create opportunities for children and young people to weigh up the risks and recognise that sometimes this means they will take risks we as adults and professionals disagree with.

Our role is to positively influence children and young people to make the healthiest long-term choices and keep them safe from harm in the short-term.

Ensure staff understand the impact of child-on-child abuse on learner's and young people's mental health as well as the additional needs or vulnerabilities of children and young people with special educational needs or disabilities; those who identify as lesbian, gay, bisexual and/or transgender; and/or those who have other perceived differences.

Check children and young people have safe relationships – in their family, with their peers and with our staff. Create the environment where it's okay to talk, even about the most difficult things.

Spot the signs and know what to do – along with our provision's safeguarding procedures, we have the confidence to raise child-on-child abuse as a possibility.

Take action – and we will keep taking action until we know children and young people are safe.

All victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the provision or college will not be downplayed and will be treated equally seriously. 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. We will ensure that children know that the law is in place to protect them rather than criminalise them, and we will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states 'child-on-child abuse should be taken as seriously as abuse by adults and should be subject to the same learner protection procedures.

Victims of child-on-child abuse will be supported by the provision's pastoral system and

referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff at Cloud Hub have any concerns regarding child-on-child abuse, they speak to their DSL or DDSL. Our staff will not develop high thresholds before acting.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).

- Abuse in intimate personal relationships between peers.

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

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

- Sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.

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

- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

- Upskirting, (which is a criminal offence) 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

All staff **are** clear as to the provision's or college's policy and procedures with regards to child-on-child abuse and the important role they play in preventing it and responding where they believe a learner may be at risk from it.

If staff have a concern about a learner or a learner makes a report to them, they will follow the safeguarding referral process. As in any case, if staff are in any doubt as to what to do, they should speak to the DSL/DDSL. Our behaviour policy will support any sanctions.

Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the provision community through a multi-agency risk assessment. We ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims. Risk assessments will be recorded (paper or electronic) and will be kept under review. At all times we will be actively considering the risks posed to all our children and students and put adequate measures in place to protect them and keep them safe. Our risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform our approach to supporting and protecting our children and students and updating our own risk assessment.

Guidance Documents:

- [Staffsscb-Responding to Sexting Guidance](#)

- [Disrespect NoBody campaign](#)

- [CEOP-Safety centre](#)

- [UKCIS Guidance: Sharing Nudes and Semi-Nudes](#)

- [Review of sexual abuse in provisions and colleges - GOV.UK (www.gov.uk)](#)

- [Searching, screening and confiscation (publishing.service.gov.uk)](#)

- [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)](#)

- [Undressed (lgfl.net)](#)

Children Missing Education

All professionals working with children, as well as the wider community can help by remaining vigilant to learner's safety. The law states every learner should be receiving an education, and we stand a better chance of ensuring a learner's safety if we know where and how they are receiving this. *The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory provision age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.*

A learner going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; learner criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

Our provision holds **at least 2** emergency contact numbers for each learner. If a learner goes missing from our provision and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some children.

Please ensure that your policies are clear regarding children going missing from the provision site and that **ALL** staff are aware of the processes and the role that they **ALL** play in this. In particular the importance of the completing class registers at the earliest opportunities.

The provision will notify the Local Authority of any learner/student who fails to attend provision regularly after making reasonable enquiries or has been absent without the provision's permission for a continuous period of 10 days or more. The provision (regardless of designation) will also notify the Local Authority of any learner/student who is to be deleted from the admission register because s/he:

- Has been taken out of provision by their parents and is being educated outside the provision system (e.g. elective home education).

- Has ceased to attend provision and no longer lives within a reasonable distance of the provision at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the provision of the change).

- Displaced because of a crisis e.g. domestic violence or homelessness.

- Has been certified by the provision medical officer as unlikely to be in a fit state of health to attend provision before ceasing to be of compulsory provision age, and neither s/he nor his/her parent has indicated the intention to continue to attend the provision after ceasing to be of compulsory provision age;

- Is in custody for a period of more than four months due to a final court order and the Head of Provision does not reasonably believe that s/he will return to the provision at the end of that period; or

- Has been permanently excluded.

Our provision will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing'

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeated occasions can act as a vital warning sign to a range of safeguarding issues, including neglect, learner sexual and learner criminal exploitation - particularly county lines. It is important the provision or college's response to persistently absent children and children missing education supports identifying such abuse, and in the case of absent children, helps prevent the risk of them becoming a learner missing education in the future.

This includes when problems are first emerging but also where children are already known to local authority learner's social care and need a social worker (such as a learner who is a learner in need or who has a learner protection plan, or is a looked after learner), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes:

- **Working together to improve provision attendance including information on how provisions should work with local authority learner's services where provision absence indicates safeguarding concerns.**

- **Information regarding provisions' duties regarding children missing education, including information provisions must provide to the local authority when removing a learner from the provision roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children missing education .**

- **Further information for colleges providing education for a learner of compulsory provision age can be found in: Full-time enrolment of 14 to 16-year-olds in further education and sixth-form colleges**

- **General information and advice for provisions and colleges can be found in the Government's Missing Children and Adults strategy.**

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or provision, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children.

Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document

- [Children who run away or go missing from home or care](#)

Learner Sexual Exploitation (CSE) and Learner Criminal Exploitation (CCE).

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a learner into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Learner Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions.

- Children who associate with other young people involved in exploitation.

- Children who suffer from changes in emotional well-being.

- Children who misuse drugs and alcohol.

- Children who go missing for periods of time or regularly come home late.

- Children who regularly miss provision or education or do not take part in education.

- Guidance documents:

- [Safeguarding children who may have been trafficked](#)

- [SOTSCP Learner Exploitation](#)

Learner sexual exploitation (CSE)

CSE is a form of learner sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a learner in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the learner's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any learner, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girl-friends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents:

- [Learner Sexual Exploitation Definition & Guidance](#)

- [Know about CSE](#)

Children with family member is prison

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will work with the children and their families as much as possible to mitigate the harm by offering early help and emotional wellbeing support where necessary and recognise additional risks such as witnessing arrests, trauma of prison visits, concerns regarding an offenders release and return home.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including provisions, further and higher educational institutions, learner referral units, special educational needs provisions, learner's homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed.

internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and provision), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered. Further information can be found here [National Referral Mechanism](#)

If a learner is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any learner or young person (male or female) under the age of 18 years.

- Can affect any vulnerable adult over the age of 18 years.

- Can still be exploitation even if the activity appears consensual.

- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.

- Can be perpetrated by individuals or groups, males or females, and young people or adults and

- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance Document:

- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

- [County Lines toolkit](#)

Domestic Abuse

Any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- Psychological

- Physical

- Sexual

- Financial

- Emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a learner may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our children/ young people.

Controlling behaviour

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Our provision is signed up to Operation Encompass and act appropriately when we receive an alert to support the children in our provision.

Guidance Documents:

- [Domestic Violence and Abuse](#)

- [SOTSCP Domestic Abuse](#)

- [NSPCC-Domestic Abuse](#)

- Operation Encompass helpline 0204 513 9990 (8am-1pm Mon-Fri)

- Appendix 8 of this policy

Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at provision, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- NSPCC-Parental Substance Misuse
- SOTSCP Parent Substance Misuse
- Drugs Advise for Provisions

Fabricated or Induced Illness (FII)

Fabricated or Induced Illness is a condition whereby a learner suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a learner's health should be discussed with a health professional who is involved with the learner. Guidance Documents:

- Safeguarding children in whom illness is fabricated or induced
- SOTSCP Safeguarding Children in whom illness is fabricated or induced

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a learner's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk 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 will be progressed as appropriate, and in accordance with local procedures, this will **not** replace a referral into learner's social care where a learner has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 year olds could be living independently from their parents or guardians and they will require a different level of intervention and support. Learner's services will be the lead agency for these young people and the DSL will ensure that appropriate referrals are made based on the learner's circumstances.

Further explanation is found at Homeless Reduction Act Factsheets Homeless reduction factsheet.

Honour-based Abuse

So-called 'honour-based' abuse (HBA) 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 HBA 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 learner being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of learner abuse with long-lasting harmful consequences. It is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse".

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined 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.

Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve learner's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that 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, staff will follow local safeguarding procedures.

Guidance Documents:

- Multi Agency Statutory guidance on Female Genital Mutilation
- Female Genital Mutilation Act 2003
- Mandatory reporting of FGM factsheet

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one, entered, **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 a marriage. The 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). Some perpetrators use perceived culture practices, to coerce a person into marriage. Provisions and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other learner protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one

chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Guidance Documents:

- Forced Marriage
- The right to choose: government guidance on forced marriage

Children who identify as or are perceived as are Lesbian, Gay, Bi or Trans (LGBT+)

We know the fact that a learner or a young person may be LGBT is not in itself an inherent risk factor for harm. However, we know that children who are LGBT can be targeted by other children.

In some cases, a learner who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

We are aware that risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. We therefore endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and a range of support is available to us to help counter homophobic, biphobic and transphobic bullying and abuse as below.

RSE curriculum

Mental Health

All staff have an incredibly important role to play in supporting the mental health and wellbeing of our children and are aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic Adverse Learnerhood Experiences (ACE), this can have a lasting impact throughout learnerhood, adolescence and into adulthood. It is key that staff are aware of how these learner's experiences, can impact on their mental health, behaviour, and education.

Guidance and helpful documents:

- [Addressing Trauma and Adversity](#)

- [Mental Health and Behaviour in Provisions Guidance](#).

- [Preventing and tackling bullying](#)

- [Every Interaction Matters](#)

- [MIND-Parenting Capacity and Mental Health](#)

- [NSPCC-Mental Health and Parenting](#)

If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken, following their learner protection policy, and by speaking to the DSL or a deputy.

Online Safety

The use of technology has become a significant component of many safeguarding issues. Learner Criminal Exploitation, Learner Sexual Exploitation, radicalisation, sextortion, sexual predation, and technology often provides the platform that facilitates harm.

At Cloud Hub, we realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole provision/college approach to online safety which empowers us to protect and educate children, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your children, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have appropriate filtering and monitoring systems in place, on provision devices and provision networks and these are regulated, and risk assessed as part of the prevent duty.

Our filtering and monitoring standards will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.

- review filtering and monitoring provision at least annually.

- block harmful and inappropriate content without unreasonably impacting teaching and learning.

- have effective monitoring strategies in place that meet their safeguarding needs

The Governing body will review the standards and discuss with IT staff and service providers what more needs to be done to support provisions and colleges in meeting this standard.

We have an online safety policy, which identifies the usage and expected behaviour of children/students. As a provision we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

Education at home/Remote learning: - Where children are being asked to learn online at home, our provision will refer to and use the links and resources provided by the DfE; Safeguarding in provisions, colleges and other providers and safeguarding in remote education.

What do Cloud Hub use?

At Cloud Hub, staff use the 'Senso' – a cloud-based monitoring and management system. Senso protects all users at Cloud Hub by proactively monitoring provision devices and indicating safeguarding concerns to the relevant staff. Senso flags users who may be vulnerable or at-risk and users who may pose a risk to others, as well as any inappropriate, off-task or harmful behaviour.

Regarding reporting and monitoring safeguarding concerns, and in-line with statutory guidance, Senso provides a tool allowing users to anonymously report a concern about themselves or someone else electronically, with the ability to take screenshots if appropriate.

Online safety is taught at all opportunities throughout the timetable wherever possible. Information and guidance are also communicated during parent meetings, termly newsletters and via our social media page.

An annual review of our approach to online safety is supported by an annual risk assessment that considers and reflects the risks our children face. This is all completed with the provision team to ensure there is consistency in our approach to online safety.

Guidance Documents:

- Learner's Commissioner-Online Safety
- Teaching online safety in education settings
- Appropriate Filtering and Monitoring
- CEOP-Safety Centre
- National Cyber Security Centre
- NSPCC-Undertaking remote teaching safely
- 360 Degree Safe - Online Safety Review Tool
- UKCCIS-UK Council for Learner Internet Safety

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a learner under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.

- Children whose parents cannot care for them because their work or study involves long or antisocial hours.

- Children sent from abroad to stay with another family, usually to improve their educational opportunities.

- Unaccompanied asylum seeking and refugee children.

- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.

- Children staying with families while attending a provision away from their home area.

Our staff at Cloud Hub will notify the DSL/DDSL when they become aware of a private fostering arrangement. There is a mandatory duty on the provision to inform Stoke-on-Trent Learner's Social Care of a private fostering arrangement by contacting (01782 235100), who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Documents:

- [Children Act 1989 – Private Fostering](#)
- [SOTSCP Private Fostering Guidance](#)

Preventing Radicalisation

** The 'Preventing Radicalisation' section of KCSIE is under review because of the new definition of extremism (released on 14th March 2024). **

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a provisions' or colleges' safeguarding approach.

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

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- **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.

At Cloud Hub, we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Children/students and provision staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a learner is likely to be susceptible to an extremist ideology. Background factors combined with specific influences, like family and friends may contribute to a learner's vulnerability. Similarly, radicalisation can occur through many various methods (such as social media or the internet) and settings (e.g. within home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Cloud Hub is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the provision's safeguarding duty.

The provision's or college's DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in **Appendix 6**.

Prevent Duty and Channel

Prevent

The Head of Provision / DSL will assess the level of risk within the provision and put actions in place to reduce that risk. Risk assessment may include consideration of the provision's RE curriculum, SEND policy, Assembly Policy, the use of provision premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the provision's profile, community and philosophy.

All provisions are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our provision's wider safeguarding obligations.

DSLs and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with provisions (and covers learner care). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Our provision has a Prevent Single Point of Contact (SPOC) who is the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL.

The SPOC for our provision is Kirsty Woolridge.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Staffordshire Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.

- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and

- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for provisions to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

- Provisions have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Guidance Documents:

- [The Prevent Duty.](#)
- [Educate Against Hate](#)
- [ACT Early | Prevent radicalisation](#)

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from provision, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from provision, having experienced learner maltreatment and having been involved in offending, such as theft or robbery.

Guidance documents:

- [Home Office Preventing Youth Violence and Gang Involvement](#)
- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

Young Carers

We understand that a young carer is someone aged 18 or under who helps look after a relative who has a condition, such as a disability, illness, mental health condition, or a drug or alcohol problem.

Most young carers look after one of their parents or care for a brother or sister. They do extra jobs in and around the home, such as cooking, cleaning, or helping someone to get dressed and move around.

Some children give a lot of physical help to a brother or sister who is disabled or ill. Along with doing things to help your brother or sister, you may also be giving emotional support to both your sibling and your parents.

We know that some of the risks associated with being a young carer are risk of truancy, under-achievement, isolation, mental and physical ill health, poverty and stress.
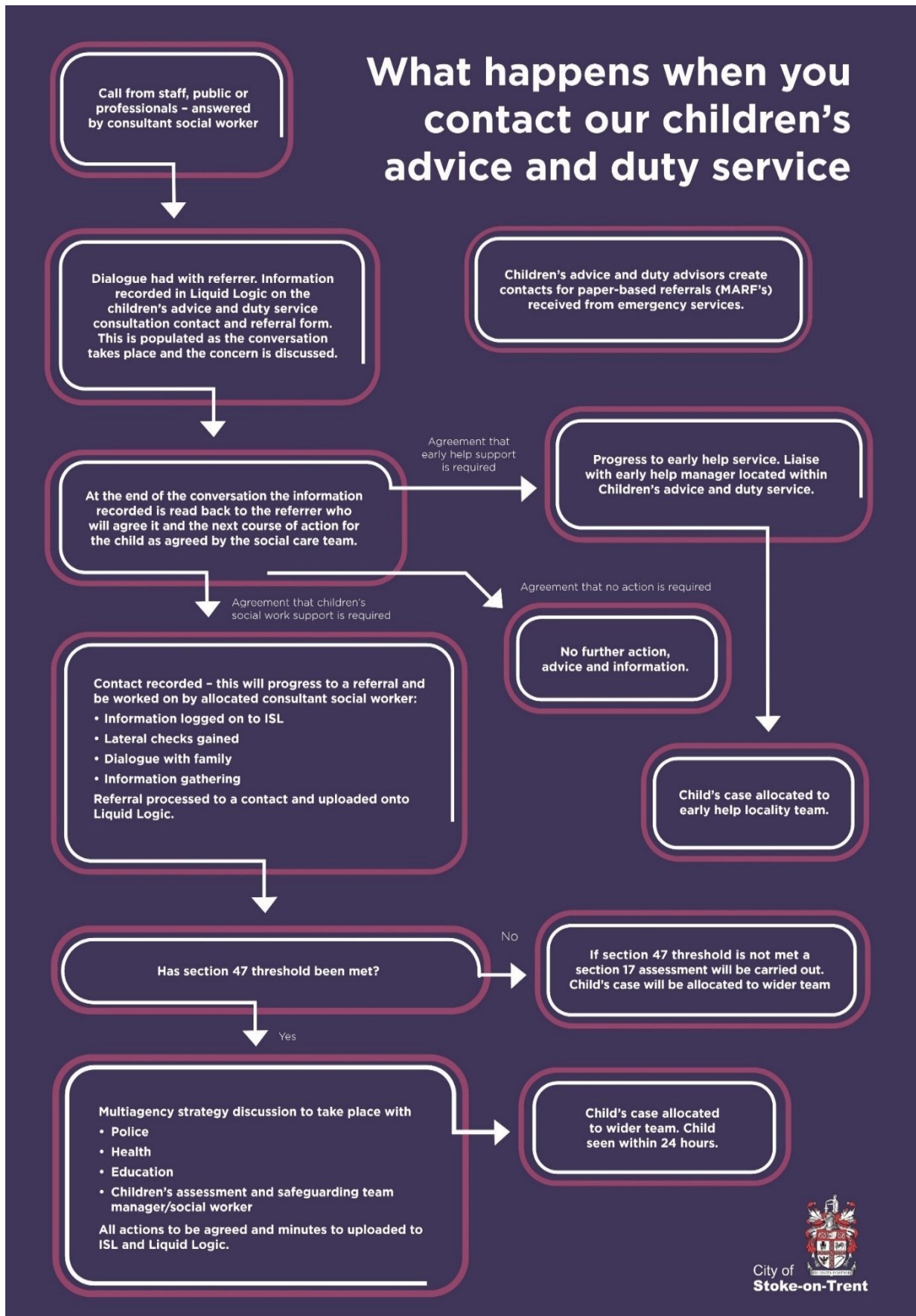
Dealing with a Disclosure of Abuse

When a learner tells me about abuse, they have suffered, what should I remember?

- Stay calm.

- Do not communicate shock, anger, or embarrassment.

- Reassure the learner and tell them that you are pleased that they are speaking to you.

- Never agree or promise to keep it a secret. Assure them that you will try to   help but let the learner know that you will have to tell other people to do this and state who this will be and why.

- Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.

- Tell the learner that it is not their fault.

- Encourage the learner to talk but do not ask "leading questions" or press for information.

- Use the acronym **T.E.D**: **T**ell me. **E**xplain. **D**escribe.

- Listen and remember to check that you have understood correctly what the learner is trying to tell you.

- Communicate that they have a right to be safe and protected.

- It is inappropriate to make any comments about the alleged offender.

- Be aware that the learner may retract what they have told you. It is essential to record in writing, all you have heard, though not necessarily at the time of the disclosure.

- At the end of the conversation, tell the learner again who you are going to tell and why it is that person or people who need to know.

- As soon as you can afterwards, make a detailed record of the conversation using the learner's own language. Include any questions that you may have asked. Do not add any opinions or interpretations. (dates, times, names mentioned and to whom the information was passed need to be clearly recorded).

- Use the provisions written/electronic recording forms.

- If the disclosure relates to a physical injury do not photograph the injury, but record in writing in as much detail as possible.

The information should then be passed, in a timely way, to the DSL/DDSL and immediately if the learner discloses any abuse they have suffered or may be at risk of suffering.

If DSL/DDSL not available, it is the staff member's **responsibility** to make a referral to Staffordshire Children's Advice and Support and inform the DSL at the earliest opportunity.

What happens when you contact our children's advice and duty service

Call from staff, public or professionals – answered by consultant social worker

↓

Dialogue had with referrer. Information recorded in Liquid Logic on the children's advice and duty service consultation contact and referral form. This is populated as the conversation takes place and the concern is discussed.

Children's advice and duty advisors create contacts for paper-based referrals (MARF's) received from emergency services.

↓

Agreement that early help support is required →

At the end of the conversation the information recorded is read back to the referrer who will agree it and the next course of action for the child as agreed by the social care team.

Progress to early help service. Liaise with early help manager located within Children's advice and duty service.

Agreement that no action is required →

Agreement that children's social work support is required ↓

No further action, advice and information.

Contact recorded – this will progress to a referral and be worked on by allocated consultant social worker:
- **Information logged on to ISL**
- **Lateral checks gained**
- **Dialogue with family**
- **Information gathering**

Referral processed to a contact and uploaded onto Liquid Logic.

Child's case allocated to early help locality team.

↓

No →

Has section 47 threshold been met?

If section 47 threshold is not met a section 17 assessment will be carried out. Child's case will be allocated to wider team

Yes ↓

Multiagency strategy discussion to take place with
- **Police**
- **Health**
- **Education**
- **Children's assessment and safeguarding team manager/social worker**

All actions to be agreed and minutes to uploaded to ISL and Liquid Logic.

Child's case allocated to wider team. Child seen within 24 hours.

City of
Stoke-on-Trent

Allegations about a Member of Staff (incl. supply), Governor or Volunteer

1. Inappropriate behaviour by staff/supply staff/volunteers could take the following forms:

   - **Physical**

   For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.

   - **Emotional**

   For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for learner's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.

   - **Sexual**

   For example, sexualised behaviour towards children, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.

   - **Neglect**

   For example, failing to act to protect a learner or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.

   - **Spiritual Abuse**

   For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

2. If a learner makes an allegation about a member of staff, supply staff, Governor, visitor or volunteer the Head of Provision/Principal must be informed immediately. The Head of Provision/Principal must carry out an urgent initial consideration to establish whether there is substance to the allegation. The Head of Provision or Principal should not carry out the investigation him/herself or interview children.

3. The Head of Provision/Principal will exercise and be accountable for their professional judgement on the action to be taken as follows:

   - If the actions of the member of staff, and the consequences of the actions, raise credible Learner Protection concerns the Head of Provision/Principal will notify the Staffordshire Designated Officer **(LADO 01782 235100)**. The LADO will liaise with the Chair of Governors and advise about action to be taken and may initiate internal referrals within Staffordshire Children Social Care to address the needs of children likely to have been affected.

   - If the actions of the member of staff, and the consequences of the actions, do not raise credible learner protection concerns, but do raise other issues in relation to the conduct of the member of staff or the learner. These should be addressed through the provision's own internal procedures.

   - If the Head of Provision/Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the learner safeguarding file.

4. Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers). In no circumstances will our provision/college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Governing body/Head of Provision will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the provision, whilst they carry out their investigation.

5. Where an allegation has been made against the Head of Provision/Principal or Head of Provision, then the Chair of the Governing Body takes on the role of liaising with the LADO in determining the appropriate way forward.

    SOTSCP Managing Allegations of Abuse against a person who works with children

6. Where the allegation is against the sole Head of Provision, the referral should be made to the LADO directly.

Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:

   Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:

   - The demonstration of unacceptable behaviour by using any means or medium to express views which

   - Encourage, justify, or glorify terrorist violence in furtherance of beliefs

   - Seek to provoke others to terrorist acts

   - Encourage other serious criminal activity or seek to provoke others to serious criminal acts or

   - Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Children may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that provision staff can recognise those vulnerabilities.

6. Indicators of vulnerability include:

   - Identity Crisis – the student/learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society.

   - Personal Crisis – the student/learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

   - Personal Circumstances – migration; local community tensions; and events affecting the student/learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

   - Unmet Aspirations – the student/learner may have perceptions of injustice; a feeling of failure; rejection of civic life.

- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.

- Special Educational Need – students/children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. This list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters.

- Family members convicted of a terrorism act or subject to a Channel intervention.

- Accessing violent extremist websites, especially those with a social networking element.

- Possessing or accessing violent extremist literature.

- Using extremist narratives and a global ideology to explain personal disadvantage.

- Justifying the use of violence to solve societal issues.

- Joining or seeking to join extremist organisations.

- Significant changes to appearance and/or behaviour; and

- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Role of the Stoke-on-Trent LADO

The Stoke-on-Trent City Council LADO (Local Authority Designated Officer) promotes a safer learner's workforce by providing effective guidance, advice, and investigation oversight to cases. They may be able to offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO Duty Officer and where the broader goals of a safer learner's workforce are relevant.

The service will give advice on how concerns or allegations should be investigated, including if a referral needs to be raised with the Police and/or Learner's Social Care. Stoke-on-Trent LADO is not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together. They will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS.

The Stoke-on-Trent Safeguarding Children Partnership inter-agency procedures for:

[Managing Allegations of Abuse against a person who works with children](#)

is based on the framework for dealing with allegations made against an adult who works with children, this is detailed in [Working Together to Safeguard Children 2018](#) and should be followed by all organisations providing services for children and young people. Compliance with these procedures will help to ensure that allegations are dealt with consistently and in a timely manner; that a thorough, proportionate, and fair process is followed and that processes are open to challenge.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a learner has or has not been harmed.

Who to refer concerns to:

All reports of concern or allegation to the Stoke-on-Trent LADO (Local Authority Designated Officer) that an adult working or volunteering with children:

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

Step 1: Follow KCSiE 2024 Guidance. Head of Provision/ Chair of Governors/ Head of Provision will contact the LADO on 01782 235100.

Step 2: Stoke-on-Trent's Learner's Advice & Duty service (ChAD) will ensure that the matter is

passed promptly to the Staffordshire LADO Duty Officer and assist in initiating any additional safeguarding activities.

If your concern or allegation is urgent and outside of office hours telephone: 01782 234234 (Emergency Duty Team).

This single referral point will provide a responsive and inclusive service for all learner's workforce sectors, focus the advice and support where it is needed most and enable the team to continue to work effectively with partners.

Operation Encompass Staffordshire -Supporting children experiencing domestic abuse throughout Stoke and Staffordshire

Operation Encompass is an information sharing partnership between Staffordshire Police and Staffordshire and Stoke-on-Trent educational settings (from Reception through to Higher Education) which allows provisions to offer immediate support for children and young people experiencing domestic abuse.

How does Operation Encompass work?

Information obtained by the police at the attendance of a domestic abuse incident is shared with a provision prior to the start of the next provision day which enables appropriate support to be given dependent on the needs of the learner.

How do the provisions receive notification by the police that a domestic incident has occurred?

When an officer attends the incident and completes the risk assessment on their handheld device, the name(s) of the children who form part of the household (whether present on not) are included. Alongside the details of the learner, the officer will select the provision that the learner attends from the dropdown list. By completing this section of the risk assessment, the officer generates an automatic referral to the provision via an email in real time.

Limited information will be shared about the incident; the name and DOB of the learner (if known), the fact they have been identified as being in a household where a domestic abuse incident took place, date and time of the incident and a police reference number.

How does the notification help to support the learner?

Children experiencing domestic abuse are negatively impacted by this exposure and this can lead to emotional, physical and psychological harm. By providing the provision with the knowledge that a domestic incident has taken place in the homes of their students the previous day, it allows the provision to consider appropriate support for the learner.

Learner's Social Care:

Once a notification is received from Staffordshire Police there is **NO** requirement for the Provision to then make a referral to Learner's Social Care. Please be reassured that it is purely a notification to enable the Provision to support that learner. If there is a requirement for a referral to be made, the Police would have already done this if necessary. The training provided to Provisions outlines this message clearly. Of course, if the learner is already an 'open case' then the provision would inform the dedicated key/social worker of the notification.

Next Steps:

Staffordshire Police, and Staffordshire and Stoke Education Authorities have provided a virtual bespoke training package which will enable Provisions to understand the impact domestic abuse can have on a learner and how best to support them in provision. This will be available in due course.

Further advice on Safeguarding matters can also be obtained from:

Local Contacts

- Stoke-on-Trent Learner's Services: Learner's Advice and Duty Service (CHAD) 01782 235100, between the hours of 8am & 6pm, Monday- Friday.

  Select Option 1 if known to have a Social Worker

  Select Option 2 for any new queries for children not already open to social care

- Stoke-on-Trent Emergency Duty Team: 01782 234234 (outside office hours, weekends, and bank holidays) Minicom: 01782 236037

- LADO Stoke-on-Trent 01782 235100

- Staffordshire County Council's Education Safeguarding Advice Service 01785 895836 e-mail: esas@staffordshire.gov.uk (for children living within the Staffordshire local authority area)

- Staffordshire Children's Advice and Support (SCAS) – (Tel. 0300 111 8007).

- Staffordshire Children's Advice and Support - EDS (out of hours) Tel No. 0345 604 2886 or email: eds.team.manager@staffordshire.gov.uk

- Staffordshire Learner's Social Care Services: Staffordshire Learner's Advice and Support team within the Multi Agency Safeguarding Hub (M.A.S.H.) 0800 1313 126 or using the online referral Report a concern online

- Staffordshire Emergency Duty Services (out of hours safeguarding concerns) 0345 604 2886 or email eds.team.manager@staffordshire.gov.uk

- Stoke-on-Trent & Staffordshire Police M.A.S.H. can be contacted on 101. In the event of an emergency please dial 999

- Staffordshire Police coordinator: Mark Hardern Tel: 07539 3636299 Email: mark.hardern@staffordshire.pnn.police.uk

- Stoke-on-Trent PREVENT Education officer – Sarah Dyer – 01782 233239/07900135606

- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email prevent@stafford-shire.pnn.police.uk

NSPCC

- Harmful sexual behaviour (HSB)

- Keeping children safe online-online safety/sexting/sending nudes

Local

- Stoke-on-Trent Safeguarding Children Partnership SOTSCP

- Staffordshire Safeguarding Children Board StaffsSCB

- Fostering Service (Stoke-on-Trent) 01782 234555 Email: fostering@stoke.gov.uk

- Family Information Service Hub (F.I.S.H) 01782 232200 Email: fish@stoke.gov.uk

National Contacts

- Police (non-emergency 101)

- CEOP (Learner Exploitation and Online Protection) CEOP Safety Centre

- Professionals Online Safety Helpline – 0844 381 4772 Safer Internet Helpline

- Internet Watch Foundation (IWF) – Internet Watch Foundation

- Safer Internet Centre – helpline@saferinternet.org.uk

- Learnerline – 0800 1111 Learnerline

- Ofsted – General enquiries: 0300 123 1231

  About Provisions: 0300 123 4234

  Concerns: 0300 123 4666

  e-mail: enquiries@ofsted.gov.uk

- HM Government (advice on protecting children from radicalisation for parents, teachers and leaders) www.educateagainsthate.com

- **NSPCC** Harmful Sexual Behaviour project: **0844 892 0273**

Useful websites

- Stoke-on-Trent Safeguarding Children Partnership SOTSCP

- Staffordshire Safeguarding Children Board StaffsSCB

- Learner Exploitation and Online Protection Centre (CEOP) – Ceop-Police & knowaboutcse

- NSPCC – 24-hour Learner Protection Helpline 0808 800 5000 NSPCC

- WOMENS AID - 24 Hour Helpline: **0870 2700 123**

- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a learner is in immediate danger, please call 999. Unicef

Cloud Hub is committed to safeguarding and promoting the welfare of children and young people. We expect all staff and volunteers to share this commitment.