FRONTIER
LEARNING TRUST

Safeguarding Policy

2024-2025

Date(s) when reviewed	Sept 2024
Date of next review	Sept 2025
Regularity of review	Annual
Responsible reviewer (post title)	APSS & FLT DSL

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Introduction

All Trusts are required to have a Safeguarding Policy that guides the procedures and practices of staff when safeguarding and promoting the welfare of children, young people and vulnerable adults who are also commonly termed as adults at risk (henceforth referred to as students). **Frontier Learning Trust** takes its duty towards all its students who have been entrusted to our care very seriously and seeks to provide a Trust environment where all students are safe, secure, valued, respected, and listened to.

The Frontier Learning Trust (FLT) understands that our work in safeguarding and protecting children and vulnerable adults must always have regard for the national guidance issued by the Secretary of State and should be in line with local guidance and procedures. This policy applies to all persons acting on behalf of or engaged in activities associated with FLT including, for example, members of the Governing Body, staff employed by the Trust, visitors to, and contractors working at, Trust premises. This includes third party contractors whose employees or sub-contractors have access to Trust premises, e.g. facilities providers, building contractors and such like. Visitors (including visiting speakers) will report to reception and be escorted on and off the premises. The liaison member of staff will evidence and verify their ID on site. If they do not have a valid and enhanced DBS clearance (that would need to be evidenced in advance), they must be always supervised.

We understand the term **safeguarding** to mean that we will take all reasonable measures to ensure that the risk of harm to children and vulnerable adults' welfare is minimised. We also understand that, where we have any concerns about a student's welfare, we will take all appropriate action to address those concerns by working in full partnership with other agencies. All staff at FLT understand that a range of other Trust policies are central to many aspects of the **Trust's Safeguarding Policy**, and this document should therefore be read in conjunction with our policies for:

• Student code of conduct
• Bullying & Harassment for Child-on-Child
• Attendance
• Health & Safety
• Recruitment
• Disclosure & Barring
• Confidential Reporting (whistleblowing)
• Visiting Speakers
• Staff Disciplinary
• Student Disciplinary

Our **Safeguarding Policy** is written with due regard to the national guidance published by the Department for Education entitled **Keeping children safe in education 2024 Statutory guidance for schools and colleges,** including **Working together to improve school attendance** which should be read alongside **Working together to safeguard children 2023, Statutory guidance on multi-agency working to help, protect and promote the welfare of children** and **Prevent duty guidance: England and Wales (2023)**

Our policy adoption and review dates are stated on the front page of this policy. It will be reviewed annually by our Governors and the Senior Leadership Team (including the Designated Safeguarding Lead) and each time any subsequent guidance is issued by the Secretary of State. (New guidance 1st September 2024)

Our Trust procedures for safeguarding children and vulnerable adults will always be compliant with the Local Safeguarding Children Board for **Barnet Child Protection Procedures** produced by the Safeguarding Children Board. Those procedures which have been adopted by the Local Safeguarding Children Board which are Barnet Safeguarding Children Partnership are available from: **https://thebarnetscp.org.uk/bscp**

Our procedures will be followed by all adults, including volunteers, working with or on behalf of the Trust.

This policy is available to all parents/guardians either in hard copy or from our website.

1. Policy Statement

Frontier Learning Trust (FLT) is committed to safeguarding and promoting the welfare of all its students and the trustees expect all staff and volunteers to share this commitment. Staff must demonstrate their understanding of how each individual adult working on behalf of FLT has an active part to play in protecting children and vulnerable adults from harm and promoting their welfare.

All staff must be clear about their own role and that of others in providing a caring and safe environment for all students and must know how they should respond to any concerns about an individual student that may arise. To this end FLT will ensure that all staff, whether permanent or temporary, and volunteers know the name of the member of the senior leadership team who has designated overall responsibility for child protection and safeguarding, the Designated Safeguarding Leads (DSLs). The full safeguarding team is displayed on posters in every classroom, in communal spaces and offices.

In the absence of the DSL we will ensure that we have a member of staff, who has received training to undertake the role. The DSLs and Assistant Designated Safeguarding Leads (ADSL) are supported by a trained team who can manage safeguarding and child protection referrals and concerns on a day-to-day basis.

All staff receive appropriate training during their induction period, and regularly thereafter in order that they are equipped with the skills needed to keep children safe.

FLT will always follow safe recruitment procedures so that we can be confident that all adults working in our Trust are safe to do so.

Legal definitions and associated considerations:

As a Trust, we have students from between 16 years and 19 years of age. We therefore have some students that would be defined as children and some as adults.

Child - A child is any person under the age of 18.

Vulnerable adult- A person who may need community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/ her or themself or unable to protect him/her or themself against significant harm or exploitation.

Other students

Many of our students would **not** be either children or vulnerable adults; however, the Trust has a consistent commitment to their safety and wellbeing. Whilst there will usually not be a statutory responsibility to refer such matters to Social Services, the below policy and procedures should be followed with regards to identifying and reporting abuse and managing disclosure. This information should be passed to the DSL/ADSL who will consider how FLT and/or external agencies can support the young person to ensure their physical and emotional wellbeing, as well as their ability to be successful on their course.

Consideration of those outside of the Trust

Throughout staff interaction with our students, especially when managing safeguarding and child protection matters, information may be disclosed that suggest other children or young adults are being abused or at significant risk of harm. We have a responsibility, as a public body, to consider this information and whether sharing this information can help safeguard others outside of the Trust. Any information that suggests children or young people external to FLT should also be reported to the Designated Safeguarding Leads, who will consider whether this information should be shared with other agencies and/or a referral should be made to Social Services.

Past Abuse

Any disclosure of past abuse should also be managed in accordance with this policy and associated procedures. This is to ensure that any criminal activity is dealt with appropriately and action can be taken to reduce the risk of future abuse.

2. Keeping Children Safe

All students at FLT must be able to place their trust and confidence in any adult working in the Trust. They must feel confident and comfortable that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately As part of FLT approach to safeguarding governing bodies and proprietors create a culture that safeguards and promotes the welfare of children in our college. As part of this culture, we have adopted a robust recruitment procedure that deters and prevents people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities F LT.

Student Disclosure

All staff must therefore know what to do if a student chooses to talk to them about any matter which raises child protection concerns. All staff must follow appropriate guidelines with regards to disclosure.

The DSL/ADSL will:

- Assess any urgent medical needs of the student.
- Consider whether the student has suffered or is likely to suffer significant harm.
- Check whether the student is known to the Trust as currently subject to a Child Protection Plan or having been previously subject to a Plan.
- Confirm whether any previous concerns have been raised by staff.
- Consider whether the matter should be discussed with the student's parents/guardians or whether to do so may put the student at further risk of harm because of delay or the parent/guardian's possible actions or reactions.
- Seek advice if unsure that a child protection referral should be made.

The DSL/ADSL will decide whether to make a referral to Barnet's triage service. Guidance on how we make these requests to the triage service for either support or protection can be accessed here: https://thebarnetscp.org.uk/bscp

If a referral is not considered appropriate at that stage, the DSL/ADSL will make full written records of the information that have been received detailing the reasons for their judgement stating why the matter was not referred to the local authority.

Child Protection – Recognition and Response to Abuse

Owing to the nature of the day-to-day relationship students at FLT have with staff, all adults working in the Trust are particularly well placed to notice any physical, emotional, or behavioural signs that suggest a student may be suffering, or at risk of, significant harm. We understand that harm means the ill-treatment or impairment of a child or vulnerable adult's health and/or development, including that caused because of and including where they see, hear or experience its effects of the ill-treatment of another person and we understand that not all students will choose to talk, but may communicate through different ways.

We will always be aware of and alert to any indicators that a student is suffering harm. All staff will report any concerns to the DSLs/ADSLs immediately. All staff will receive regular safeguarding training in order that their awareness to the possibility of a child or vulnerable adult suffering harm through physical abuse, emotional abuse, sexual abuse, and/or neglect remains high.

Exposure to extremism

Extremism can lead to the radicalisation of individuals, deny people their full rights and opportunities, suppress freedom of expression, incite hatred, erode our democratic institutions, social capital, and cohesion, and can lead to acts of terrorism.

The definition of extremism (March 2024) is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

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

Staff receive training on a rolling program of workshops on Prevent Duty Guidance with workshops to raise awareness of Prevent (WRAP)

Further staff training is available for staff to broaden their understanding and awareness of all categories of abuse. An alert to the following levels of abuse is also shared.

• Physical Abuse
• Emotional Abuse
• Neglect
• Sexual Abuse
• Financial Abuse
• Abuse on the grounds of discrimination
• Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
• Bullying/Cyber bullying
• Radicalisation
• Domestic Abuse
• Use or abuse of drugs
• Fabricated or induced illness
• Faith abuse
• Female Genital Mutilation
• Forced Marriage
• Gangs and Youth Violence
• Mental Health
• Private Fostering
• Sharing nudes and semi-nudes
• Teenage relationship abuse
• Trafficking/ Modern Slavery
• Labour Exploitation
• Domestic Servitude
• Cannabis Cultivation
• Criminal Activity
• Underage Marriages
• Ritualistic Abuse

Safeguarding – Providing a Safe Environment

All parents/ carers of students attending FLT (namely Woodhouse College and ICLMS) must feel secure in the knowledge that they are entrusting their children to adults who will strive to keep them safe. We will do this by:

• Promoting a caring, safe, and positive environment within the Trust
• Ensuring that our staff are appropriately trained in safeguarding and child protection according to their role and responsibilities and keep a record of all training undertaken.
• Encouraging the self-esteem and self-assertiveness of all students through the curriculum so that the students themselves become aware of danger and risk, acceptable behaviour and where to seek help and advice if they are concerned for their own or another's safety.
• Working in partnership with all other services and agencies involved in the safeguarding of students including the Prevent and the Channel programme.
• Displaying appropriate posters that detail contact numbers for child protection help- lines.
• Always following safer recruitment procedures when appointing staff or volunteers to work in our Trust.
• Welcoming visitors in a safe and secure manner.
• Undertaking risk assessments when planning out of Trust activities or trips, events, and visits.
• Ensuring that any community groups which use our premises for the provision of services to children have child protection knowledge and understanding evidenced by a policy or are prepared to adopt our own policy.

Safeguarding & Child Protection in Specific Circumstances

Attendance

We are aware that student attendance can be an indicator of potential risk of harm. It is acknowledged that, as a further education provider, students may be absent from lessons for several reasons, none of which would suggest any risk of harm. However, procedures will help identify any patterns of attendance that indicate potential risk.

Students are expected to notify FLT of any days/lessons they are unable to attend. This can be through their tutor in advance or the absence line or attendance email for unexpected absences. Tutors should appraise student absence to identify any patterns and, where identified, discuss this with the student to ascertain whether there is any concern and to support the student in improving their attendance. Any uncharacteristic attendance patterns, including sustained absence without prior notification, will be immediately investigated with the support of the student support team.

Behaviour

As a trust we will always aim to maintain a safe, calm, and respectful learning environment by expecting good behaviour from all our community. (Student Disciplinary Policy)

We fully understand how behaviour can be the source of vital information indicating that a student feels unsafe at home, within their community, or college. Any concerns should be referred to the Student Services team or, if considered to be a potential safeguarding matter, to the DSL on site.

Bullying

Our code of conduct policy and anti- bullying policy set out our aim of ensuring no student becomes a victim of bullying and the work that we carry out in FLT to foster an environment where bullying behaviour is known to be unacceptable. We will always take seriously any reports of bullying and respond appropriately. Bullying can be a barrier to learning and have serious consequences for their mental health.

We understand that bullying may take different forms and may include d cyberbullying, prejudice-based and discriminatory bullying, or harassment, on the grounds of age, gender, disability, sexual orientation, race, religion, gender identity or pregnancy. Any such incident will be dealt with in accordance with our Student Behaviour policy.

Online Safety

We recognise that student's use of the internet is an important part of their education but that there are risks of harm associated with its use. We have an e-safety policy that addresses how we minimise those risks in

Trust and how we teach students to stay safe when using the internet in their lives outside of Trust. We also recognise that all members of staff and volunteers must always be mindful of the need to follow our IT Acceptable Use policy.

In accordance with our policy, we recognise that all staff should receive appropriate safeguarding and child 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 guest visitors and speakers)

External Visitors and Guest Speakers

We value the opportunities presented by external speakers for students to experience diverse opinion and to enter debate. This is seen as an essential part of both personal and academic development. We will not accept the use of language by external speakers that offends and is intolerant. Specifically, this means offensive "street," misogynistic, misanthropic, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs with a view to arousing hatred or abuse are not permitted. We value the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate.

We value freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal guidelines. We recognise and supports the moral and legal frameworks of the society and community within which it works. We will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age, or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation or violence.

All visitors are required to report to Reception and any organisation requesting to distribute leaflets on campus must seek approval from the Designated Safeguarding Lead prior to distribution. Other than the promotion of Trust business, staff and students must also request the permission of the Designated Safeguarding Lead before distributing leaflets.

For further information please refer to the Visiting Speakers Policy (MyConcern)

Health & Safety

We have a Health & Safety Policy that demonstrates the consideration we give to minimising any risk to students when on the premises and when undertaking activities out of Trust under the supervision of our staff.

Working Together with Parents, Guardians and Carers

We recognise the importance of keeping up-to-date and accurate information about students. All students are expected to provide us with accurate and up-to-date information and inform us of any changes, as outlined below:

- their own, accurate name, address, telephone numbers and email address
- names and contact details of their legal parent, guardian, or carer.
- emergency contact details (with an explanation if they differ from above)
- up-to-date health and medical information including GP details.
- any other factors which may impact on the safety and welfare of the student.

Confidentiality

Information about students given to us by themselves, their parents, guardians, carers or by other agencies will remain confidential. Staff will be given relevant information only where and when it is necessary to support the student's welfare, safety, or learning. We are, however, under a duty to share any information which is of a child protection or safeguarding nature. We understand that this is in the best interests of the student and overrides any other duties we have regarding confidentiality and information sharing. We have a duty to keep any records which relate to child protection and safeguarding work undertaken by us or our partner agencies and to ensure that these are kept apart from the main student record, stored securely and only accessible to key members of staff. We also have a duty to share such information with other agencies or partners, where this is justified as being necessary to ensure the continued safety and protection of the student.

Referrals to partner agencies

If we have a reason to be concerned about the welfare of a student, we will always seek to discuss this with the student's parents, guardians, or carers in the first instance. On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to Social Services when to do otherwise may put the student at risk of further harm either because of delay, or because of the actions of the parents, guardians, or carers.

Allegations against other students

Allegations may arise against other students which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, sexual exploitation, and radicalisation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.
The allegation

- Is of a serious nature, a criminal offence
- Is made against someone who is older and refers to their behaviour towards someone younger or vulnerable.
- Indicates that this student may have affected other students.
- Indicates that young people outside of FLT may be affected.

When such an allegation is made, it should be referred to the DSL/ADSL who will discuss with Social Services and/or the police as appropriate. The student will also be subject to FLT's Student Behaviour policy and procedures.

Safeguarding concerns raised by external agencies.

If we receive information from an external agency that a young person raises safeguarding concerns, we will work as advised to ensure other students are kept safe and they themselves are not open to malicious allegations.

3. Adults Working with Children and Vulnerable adults

(Part three: Safer recruitment Paragraph 210 KCSIE 2024)

Safer Recruitment (Please see Recruitment and Selection Policy for more details.)

All staff including agency staff and volunteers working with students in our Trust will be recruited safely and in accordance with **Safer Recruitment KCSIE 2024**. This will include questions at the interview stage by the

Principal or SLT member either in person or through Teams. Online searches of the candidates will be completed within the interview process and the successful candidates would be subjected to due diligence checks.

All vacancies are considered in the context of safeguarding ensuring that the responsibility to safeguard children and vulnerable adults is clearly stated within the requirements of the role. The knowledge, skills and experience required to safeguard children and vulnerable adults is included within a person specification.

Advertising

All vacancies are advertised in a manner that is likely to attract a wide range of suitable applicants. The advertisement will always include a statement about our commitment to safeguarding and our expectation that all applicants will share that commitment. The advertisement will state that the post is subject to an enhanced Disclosure and Barring check.

Applications

The application form will be used to enable the gathering of information about the candidates' suitability to work with children and vulnerable adults by asking specific and direct questions. All completed application forms will be scrutinised. CV's will only be accepted alongside the application form and not as a standalone document.

All shortlisted candidates will be required to complete and return a form indicating whether they have a criminal conviction, reprimand, or caution.

References

Open references or testimonials **will not** be accepted. Two recent employers will be contacted for references. No appointment will be made without references. Specific questions about the candidate's previous employment or experience of working with children and vulnerable adults will be asked. Any vague or ambiguous statements or gaps in employment will be investigated thoroughly.

Interviews

All interviews will be conducted face-to-face including online. The interview panel will always contain at least one member trained in safer recruitment practice. The interview questions will seek to ensure a thorough understanding of the candidate's values and beliefs that relate to students and young people is captured.

If any criminal disclosures have been made, the Principal discuss this with the candidate.

Appointments

An offer of appointment will be conditional upon clearance of all employment checks including enhanced DBS checks. All candidates will be required to bring original documents which confirm their identity, qualifications, and right to work. Queries will be made about online and social media presence if any incidents or issues were identified.

Any person whose checks reveal that they have sought work when barred from working with children or vulnerable adults to the Disclosure and Barring Service will be made. All staff employed by FLT as well as all governors and trustees will be recorded on the single central record.

Induction

Newly appointed staff will receive appropriate guidance about safe working practice, boundaries and propriety and explain the consequences of not following the guidance.

Concerns or Allegations

All concerns or allegations that relate to safeguarding will be investigated. If staff members have concerns about another staff member, including low level concerns then this should be referred to the CEO. (**See KCSIE 2024, Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers, and contractors**)

Where there are concerns about the CEO this should be referred to the Chair of Trustees, whose contact details are available in the Staff Hub. [Staff Hub - Home (sharepoint.com](https://sharepoint.com) This can include transferrable risks whereby inappropriate behaviour outside of work could affect their professional conduct and the risk can be transferred to the Trust (refer to the staff code of conduct and whistleblowing policies).

The Barnet's Local Safeguarding Board Guidance (available from https://thebarnetscp.org.uk/bscp) on the management of allegations against staff in Barnet's Trusts and other educational establishments in consultation with the designated officers of the local authority are followed.

Safe Practice

All adults working in or on behalf of FLT have a duty to safeguard all students and promote their welfare. We aim to provide a safe and supportive environment for our students through the relationship we have with them and their parents, guardians and carers and will always seek to ensure that all adults working in the Frontier Learning Trust behave in a manner that fosters this relationship.

All staff are aware of and have clarity about the expectations TFL sets as the standards of their behaviour towards all students and that any incident that falls below expected standards will be responded to appropriately.

Dismissal

Any member of staff who is dismissed because of misconduct relating to a child or vulnerable adult will be referred to the Disclosure and Barring Service.

Continuing Professional Development.

All staff will receive regular training in child protection and safeguarding in line with local and government guidelines.

4. Monitoring and Reviewing our Policy and Practice

The Designated Safeguarding Lead will continually monitor the safeguarding and child protection practices and bring to the notice of the Senior Leadership Team and Board of Trustees any weaknesses.

The Board of Trustees has a duty to remedy any weaknesses that are identified. The link governor for safeguarding will meet regularly with the Designated Safeguarding Lead every half term throughout the academic year. An annual report will be submitted to the Trustees and relevant Local Governing Board which will outline the safeguarding and child protection work that has been undertaken during the year. Names of students and the case specifics will not be disclosed. The Trustees, Governors, Senior Leadership Team, and Designated Staff will work together on any aspect of safeguarding and child protection that is identified as an area for development in the academic year going forward.

The policy will be reviewed annually with Trustees. (September 2024)

Appendices

The following appendices offer procedures, guidance and best practice when working with young people, to ensure a safe learning environment, and dealing with any safeguarding matter.

APPENDIX A - **Guidance for good practice when working with young people** Trust Policies, Procedures, and Systems In devising, implementing, and revising any policy/procedure/system that is relevant to young people, consideration must be given to making that policy/procedure/system appropriate to the developmental needs and capacity of young people, accessible to them, and where possible their input should be sought.

Curriculum design

In setting up any new course (or course component) onto which children or vulnerable adults will be enrolled, safeguarding their well-being must be the main priority and this should consider the developmental needs and capacity of young people.

Provision of support resources for young people

FLT induction process will include appropriate information on the Trust's Safeguarding & Child Protection policy and procedures. This includes advice on keeping themselves and others safe, information on the support teams available to them within FLT and details of how to contact the Designated Safeguarding Lead.

Appropriate behaviour

All Frontier Learning employees' volunteers, agency staff and external contractors are encouraged to demonstrate exemplary behaviour and good practice to create a positive culture and climate within FLT and protect staff from false allegations.

Always:

• Be an excellent role model e.g. no inappropriate language in the company of students.
• Treat all students with equal respect and dignity.
• Recognise the developmental needs and capacity of young people.
• Always put the welfare of each student first before the achievement of goals or targets.
• Give enthusiastic and constructive feedback rather than negative criticism.

Avoid:

• Spending excessive amounts of time alone with a student away from others.

Never:

• Enter a personal or sexual relationship or sexual activity with any student.
• Engage in rough, physical, or sexually provocative games, including horseplay.
• Allow or engage in any form of inappropriate touching.
• Make sexually suggestive comments to a student, even in fun.
• Reduce a student to tears as a form of control.
• Do things of a personal nature for students, which they can do for themselves.
• Allow allegations made by a student to go unchallenged, unrecorded, or not acted upon.
• Invite or allow students to stay with you at your home.
• Give personal details to a student, e.g. phone numbers.

E Safety and learners

All students will be informed via Induction and tutorial of who to report to and what to do if they have e-Safety concerns. Where any report of an e-safety incident is made, all parties should know what procedure is triggered and how this will be followed up. Where management considers it appropriate, the DSL may be asked to intervene with appropriate additional support from external agencies.

Online sexual harassment

Sexual harassment is likely to: violate a child's dignity, make them feel intimated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as 'sexting') inappropriate sexual comments on social media; exploitation; coercion and threats.

Our Trust follows and adheres to the national guidance - UKCCIS: Council for Child Internet Safety -   Sharing nudes and semi-nudes: advice for education settings working with children and young people December 2020

https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settingsworking-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settingsworking-with-children-and-young-people

Please see **Appendix H** for further information on **Youth Produced Sexual Imagery Searching devices** The Education Act 2011, allows staff to lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the student has a device prohibited by Trust rules, or the staff member has good reason to suspect the device may be used to:

• cause harm
• disrupt teaching
• break Trust rules
• commit an offence
• cause personal injury
• damage property

Where the person conducting the search finds an electronic device, they may examine any data or files on the device if they think there is a good reason to do so.

APPENDIX B – Types of abuse and specific safeguarding issues

Abuse is any form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse

Physical abuse is abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. This includes Fabricated or induced (formerly referred to as Munchausen Syndrome by Proxy) where a parent or carer deliberately exaggerates or causes symptoms of illness in a child. A parent or carer may fabricate signs, symptoms, and past medical history; or falsify hospital charts, records, letters, documents and specimens; or induce illness by a variety of means.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child 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 a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill- treatment of another. 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 of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. 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 child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual violence and sexual harassment between children are now recognised and is unwanted conduct of a sexual nature which can include sexual comments, remarks, or taunting.

Neglect

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

Financial or material abuse

This is usually most likely to occur with vulnerable adults and may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Discriminatory abuse

This may include any of the above types of abuse or bullying and harassment based on an individual's age, gender, disability, sexual orientation, race, religion, gender identity or pregnancy. Specific safeguarding issues There are a number of current, specific safeguarding concerns which are relevant to students within our Trust. The Designated Safeguarding Lead and other designated staff will liaise with appropriate agencies to ensure they are up to date with current safeguarding concerns and that these are both disseminated to staff as appropriate and included in policy review and training.

Child Sexual Exploitation (CSE)

We recognise that child sexual exploitation (CSE) involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) because of engaging in sexual activities. We will consider the following CSE indicators: Sexual exploitation can take many forms starting from the seemingly 'consensual 'relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. Perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises 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 child abuse with long-lasting harmful consequences.

Section 74 inserts new section 5B into the 2003 Act which creates a new mandatory reporting duty requiring specified regulated professionals in England and Wales to make a report to the police. The duty applies where, in the course of their professional duties, a professional discovers that FGM appears to have been carried out on a girl aged under 18 (at the time of the discovery).

The following list covers other current national and local safeguarding issues which could affect FLT students:

• extremism and radicalisation (see appendix E)
• bullying including cyber bullying
• domestic abuse
• drugs
• fabricated or induced illness
• faith abuse
• forced marriage
• gangs and youth violence
• gender-based violence/violence against women and girls (VAWG)
• grooming
• mental health
• private fostering
• teenage relationship abuse
• modern slavery & trafficking
• Child on Child abuse
• county lines drug trafficking associated with grooming
• homelessness
• upskirting
• honour based abuse
• breast ironing
• child abduction & community safety
• child criminal exploitation (CCE)
• child sexual exploitation (CSE) & sexual abuse
• children in the court system
• children missing education
• children with family members in prison
• contextual safeguarding
• cybercrime
• young carers

APPENDIX C - Recognising abuse and indicators of abuse (see also APPENDIX E)

Recognising abuse can be difficult. Some acts of abuse are extreme, cause visible damage and can be clearly identified: we tend to agree on these clear acts of abusive behaviour. Other behaviours are not so easily identifiable. It is important to think about the frequency, context and meaning they have for the victim. It may be difficult to recognise abuse because it is a painful subject for us, because we don't want to believe it happens, because we know and like the family or because it is too much responsibility. However, if we have any concerns, it is our responsibility to report them. All staff should be alert to the welfare of the students our work brings us into contact with and be mindful that:

• All people have the potential to abuse a child or vulnerable adult, regardless of gender, race, culture or social class.
• Students with a disability are particularly vulnerable.
• Where Domestic Abuse is present or suspected in a household it is an important indicator of child abuse.

Indicators of abuse
A student may describe an abusive act involving him/her/ them, or someone else may
express concern about the student. Other indications that a student may be being abused include the following:

• Unexpected or suspicious injuries such as bruising, cuts or burns, particularly if situated on
a part of the body not normally prone to such injuries.
• An injury for which the explanation seems inconsistent.
• Sudden and/or unexplained changes in behaviour (e.g. becoming noticeably quiet, withdrawn, or displaying sudden outbursts of temper, inability to focus, difficulty completing tasks).
• Inappropriate sexual awareness.
• Engaging in sexually explicit behaviour.
• Distrust of adults, particularly those with whom a close relationship would normally be expected.
• Difficulty in making friends.
• Inappropriate or difficult social interaction with their peers.
• Variations in eating pattern (including overeating or loss of appetite).
• Unexplained weight loss.
• Poor (or changed) personal hygiene or presentation.

It should be noted that this list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is taking place. It is not for staff to decide whether abuse is taking place. Any staff noticing any signs of abuse should consult with the Student Services Team for advice and/or further investigation. The DSL will decide whether there is significant concern for a referral.

APPENDIX D – Responding to disclosure by students.

If a young person is suffering abuse, then the likelihood is that they will talk to someone they know and trust. False allegations of abuse do occur, but they are rare. Any allegations of abuse, or suspicions of abuse, need to be taken seriously and managed in a sensitive manner. All victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence, or sexual harassment. (KCSIE)

No Trust member of staff conducts investigations or decides whether a student has been abused. Our obligation is to notice and report. Individual members of staff should never deal with child abuse disclosures in isolation and must always report them as outlined below. Information will be confidential and only be shared with people where it is necessary for the protection of the student.

Recognition

If you notice changes in a student's behaviour or regular physical marks or have any reason to suspect a student is being abused, contact a member of the safeguarding team immediately, report an initial concern via My Concern and discuss this on the same day with the DSL/ADSL on site.

Pre-Disclosure (for older children 16 +)

If you think a student wants to talk to you about abuse you must make it clear that you cannot promise absolute confidentiality, because matters may develop in ways which mean that this promise cannot be honoured. If you believe a child or vulnerable adult is at risk of harm, legally, you must report the risk.

If, on hearing this, the student does not wish to continue or if you do not feel comfortable listening to the student, you can take the following steps:

• Discuss the matter confidentially with the DSL/ ADSL or in their absence a member of the Safeguarding Team
• Make them an appointment (or bring them down) to see them: DSL/ADSL/Safeguarding Team
• Offer access to a telephone for confidential helpline support (student services office)
• Encourage them to call:
>   Childline - 0800 11 11 (Freephone 24hrs) www.childline.org.uk
>   NSPCC - 0808 800 5000 (Freephone 24hrs) 0800 056 0566 (minicom/deaf/hard of hearing)
• Always make a note of your concern on My Concern and it will automatically forward to the DSL/ADSL who will investigate and follow up.

Disclosure
It is likely to be extremely difficult for a student to disclose abuse and all staff have a role in supporting students through this process and ensuring we help them give as much information as possible.

Actions to take if a student makes a disclosure.

• React calmly so as not to make the student more anxious or discourage them from tellingmore.
• Listen carefully to what the student says without interruption.
• Use open questions to encourage further information, but do not probe.
• It is OK to have periods of silence
• Take what the student says seriously.
• Reassure the student that he/she/they were right to tell, and that he/she/they are not to blame.
• Reassure the student that there are many sources of help and that you will help and support them in seeking help.
• Explain to the student that you will need to discuss with the DSL/ ADSL naming them – and state that you can be with them when they meet. It is often most appropriate to take them to meet the DSL/ADSL (Safeguarding Coordinators) straight away, providing they are comfortable with this.
• Make a full record of what was said, using their own words (don't assume or paraphrase). Note the time and location. This will be completed online with MyConcern
• Report the matter to the DSL/ ADSL or wider Safeguarding team without delay.

If you have reason to believe that a student is at immediate risk of harm, including self-harm or suicide, bring them to a member of the safeguarding team immediately.

Actions to avoid during a disclosure.
• Panic – it may be difficult for you; however, it is far more difficult for the student. If you are distressed by the disclosure inform the DSL/ ADSL Safeguarding team for advice and support.
• Allow your shock or distaste to show.
• Probe for more information.
• Speculate or make assumptions.

• Make negative comments about the abuser.
• Approach the abuser.
• Make promises that you will be unable to keep, e.g. to keep this secret.
• Discuss the matter with colleagues/friends.

Recording

Make a brief signed note (using the student's words) of any allegations:

• the names of any people who are present during the disclosure
• the date and time of the conversation, and a brief outline of what may have happened, when, and to whom (remember other children or vulnerable adults may be involved and at risk too)
• a brief description of any injuries which are visible or alleged
• any nonverbal signs that you noticed
• the student's preferred action
• background on family- life at home- ages of siblings and circumstances

Reporting
Contact the DSL/ ADSL as soon as possible in person and report on MyConcern. In the absence of the DSL/ADSL, contact a member of the safeguarding team. The designated staff then takes responsibility for all further action, including referral to Social Services or the Police. If the student reveals past abuse or that there are other children under 18 who are currently at risk, then the above guidelines must also be followed.

APPENDIX E – Radicalisation and Extremism

FLT recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism and is committed to fulfilling its duties under the **Prevent duty guidance: England and Wales (2023)** FLT will empower its students to create communities that are resilient to extremism and to protect the wellbeing of students who may be vulnerable to being drawn into violent extremism or crime. Staff attend training on radicalisation through a rolling programme of Workshops to Raise Awareness of Prevent (WRAP) training. Further education specific documents should be read by the safeguarding teams. **The Prevent duty: safeguarding learners vulnerable to radicalisation.**

Radicalisation is the process by which individuals come to support terrorism or violent extremism. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic, or social group. It is further recognised that in many instances the process of radicalisation is one of grooming by others.

The definition of Extremism (March 2024) is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

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

Behaviour indicators

• Discriminatory language or actions towards specific groups or people with a particular protected characteristic
• Possession or sharing of violent extremist literature
• Showing or sharing online material of an extreme nature to others

- Behavioural changes (for example, becoming withdrawn)
- Expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

In respect of safeguarding individuals from radicalisation, the Trust works to the Prevent element of the Government's Counter Terrorism Strategy and follows the Prevent Duty Guidance including referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and entering the criminal justice system because of their actions.

If you have concerns about a student, contact **the senior Safeguarding Team**

How to report extremism

If you need to report extremism concerns about an adult working in a school, college or organisation that works with children, young people or adult learners, you should: contact your local authority designated officer (LADO) through your local safeguarding partnership or local authority submit the details at report extremism in education.

APPENDIX F- **Child Sexual Exploitation (CSE) and Gangs and Youth Violence**

Department for Education - Child sexual exploitation Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation February 2017

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears sensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

It can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex.

- can still be abused even if the sexual activity appears consensual.
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- can take place in person or via technology, or a combination of both.
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example).
- can be perpetrated by individuals or groups, males or females, and children or adults.
- abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse.
- age may be the most obvious sign of imbalance this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The following are typical vulnerabilities in children prior to abuse:

• Living in a chaotic or dysfunctional household (including parental substance use, Domestic Abuse, parental mental health issues, parental criminality)
• History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'- based abuse, physical and emotional abuse and neglect)
• Recent bereavement or loss
• Gang association either through relatives, peers, or intimate relationships (in cases of gang- associated CSE only)
• Attending school with young people who are sexually exploited
• Learning disabilities
• Unsure about their sexual orientation or unable to disclose sexual orientation to their families
• Friends with young people who are sexually exploited
• Homeless
• Lacking friends from the same age group
• Living in a gang neighbourhood
• Living in residential care
• Living in hostel, bed and breakfast accommodation or a foyer

Gangs and Youth Violence A gang is a street-based group of young people for whom criminal activity and violence is integral to their identity. Risk factors include offending behaviour (such as robbery, buying or selling cannabis, possessing a knife or weapon), difficulties at home and going missing, having associations with gang members (e.g. a friend or older sibling is already involved in a gang), or living in an area of deprivation.

Students who become involved in gang activity may be attracted to a sense of belonging, excitement, power, protection, and status. However, they will be vulnerable to witnessing and experiencing intimidation, violence (e.g. stabbings), emotional and physical harm; both from the gang they become affiliated with and because of conflict with rival gangs. Female students who become involved in gangs may initially be groomed and eventually become victims of sexual exploitation and sexual violence (sexual assault or rape, sometimes by multiple perpetrators) and /or coerced into criminal activity (such as robbery, carrying drugs or weapons).

APPENDIX G - Child Criminal Exploitation (CCE) Criminal exploitation of children and vulnerable adults: county lines October 2023

This is a growing issue where gangs target vulnerable children to get them to carry out criminal activity. Children who have been exploited and/or trafficked should be treated as victims rather than suspects. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons. County lines activity and the associated violence, drug dealing, and exploitation have a devastating impact on young people, vulnerable adults, and local communities. Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

The UK Government defines county lines as:

"County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line." They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons."

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation doesn't' always involve physical contact; it can also occur using technology.

Criminal exploitation of children is broader than just county lines and includes for instance child reinforced to work on cannabis farms or to commit theft.

Who is vulnerable to county lines exploitation?

• children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area: 15-16 years is the most common age range.
• bothmales andfemales being exploited, though experiences of males and females can differ greatly.
• White British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationalitymay be exploited
• the use of social media to make initial contact with children and young people
• class A drug users being targeted so that gangs can take over their homes (known as 'cuckooing')

Some of the factors that heighten a person's vulnerability include:
• having prior experience of neglect, physical and/or sexual abuse
• lack of a safe/stable home environment, now or in the past (Domestic Abuse or parental substance misuse, mental health issues or criminality, for example)
• social isolation or social difficulties
• economic vulnerability
• homelessness or insecure accommodation status
• connections with other people involved in gangs
• having a physical or learning disability
• having mental health or substance misuse issues
• being in care (particularly those inresidential care andthosewith interrupted care histories)
• it is important to note that the experience of girls who are criminally exploited can be very different to boys' experiences.
Any sudden changes in a person's lifestyle should be discussed with them.

APPENDIX H –Sharing nudes and semi-nudes, sexual violence and sexual harassment and procedures for Reporting Child on Child abuse and procedures for reporting, youth produced sexual imagery and up skirting,

Sharing nudes and semi-nudes

The sending and receiving of sexually explicit pictures, text messages or videos, either via mobile phones or the internet. The creating, sharing, and forwarding of such images may be done in a consensual way between friends or partners who want to express their sexuality. However, it is illegal if anyone under the age of 18 is involved, and this includes taking or sharing 'selfies' that are nude or 'underwear shots. The law aims to protect young people from feeling pressurized or coerced into sending sexual images. It is also illegal for a sexual image of an adult student aged 18 or 19 to be shared without their consent. FLT can support and safeguard students affected by sexting.

Youth produced sexual imagery.

• 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
• 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.

• 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

The types of incidents which this cover is:
• A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
• A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult or in possession of sexual imagery created by another person under the age of 18

Upskirting
Upskirting is the act of taking a photograph of underneath a person's skirt without their consent. It is often performed in a public place such as on public transport or on an escalator, with crowds of people making it harder to spot people taking these photos. A large proportion of women are targeted in places such as nightclubs, restaurants, and shops. Being victim to such an incident can cause emotional distress for a long time after it has happened. The law against "upskirting" came into force on April 12, 2019, in England and Wales.

Sexual violence and sexual harassment
Sexual violence refers to rape, assault by penetration, or sexual assault (Sexual Offences Act 2003). Sexual harassment refers to 'unwanted conduct of a sexual nature' that can occur online and offline. The Trust will undertake a risk assessment following a report of sexual violence, and consider safeguarding both the victim and the perpetrator, supported by other agencies such as Social Services or Police.

Sexual violence and sexual harassment between children in schools and colleges September 2021

Child on Child abuse

Child-on-child abuse usually occurs between young people who are aged under 18 but anyone who is a student in our Trust community may be affected. It can take many forms, and examples of child-on-child abuse may include, but are not limited to:

- Domestic abuse Child sexual exploitation Serious youth violence
- Harmful sexual behaviour Bullying (including cyber) Physical abuse.
- Controlling and abusive behaviour may occur between two students who are in a close, intimate relationship.
- There may be physical violence (pinching, hitting, pushing, shoving, slapping, punching, kicking), controlling behaviours.
- checking a partner's phone and emails, telling them what to wear, dictating who they can or cannot speak to, checking up on a partner all the time, keeping them away from friends and family.
- emotional and verbal abuse (making threats, belittling, name calling, shaming, bullying); sexual abuse.
- sexual assault, rape, not respecting the concept of consent within a sexual relationship, threatening to spread rumours if a partner refuses to have sex, or pressurizing a partner to engage in sexting); stalking (a pattern of harassment causing fear in the victim).

All these behaviours are abusive and harmful. The Trust procedures for reporting disclosure of child-on-child abuse: Procedures for dealing with a student who discloses they are a victim of child-on-child abuse:

• Parent/guardian contacted where safe to do so, regarding disclosure made
• Parent/guardian informed of Trust procedure for reporting to police and MASH
• Following disclosure, police 101 report will be filed by the safeguarding team

• MASH referral made for any disclosure involving student under 18 years of age at time of disclosed incident or advice sought from MASH team if student is over 18 years of age at time of disclosed incident
• Referral to appropriate external professionals for support
• If perpetrator is a Frontier Learning student, the safeguarding team will meet with parents and victim to discuss risk assessment and navigation plan around Trust
• Safeguarding team will oversee ongoing support procedures for dealing with a student who has been named as an alleged perpetrator of child-on-child abuse:
• If the alleged perpetrator is a Frontier Learning student, the Head of Student Progress and an allocated safeguarding coordinator will meet with the student and their parent to inform them of the report to 101
• At the meeting, a risk assessment and navigation plan will be discussed alongside FLT expectations and outcomes depending on the legal outcome following the report made.

Trust procedures for reporting disclosure of sexual violence or sexual harassment:

Procedures for dealing with a student who discloses they are a victim of sexual violence or sexual harassment:

• Parent/guardian contacted where safe to do so, regarding disclosure made
• Parent/guardian informed of Trust procedure for reporting to police and MASH
• Following disclosure, a police 101 report will be filed by the safeguarding team
• MASH referral made for any disclosure involving student under 18 years of age at time of disclosed incident or advice sought from MASH team if student is over 18 years of age at time of disclosed incident.
• Referral to appropriate external professionals for support
• If perpetrator is a Frontier Learning student, the safeguarding team will meet with parents and victim to discuss risk assessment and navigation plan around Trust.
• A named safeguarding coordinator will be assigned to support the victim
• A MASH referral will be made regarding being named in police 101 report for any student under 18 years of age at time of disclosed incident or advice sought from MASH team if student is over 18 years of age at time of disclosed incident
• Safeguarding team will oversee ongoing support.

Procedures for dealing with a student who has been named as an alleged perpetrator of sexual violence or sexual harassment:

• If the perpetrator is a Frontier Learning student, the Head of Student Progress and an allocated safeguarding coordinator will meet with the student and their parent to inform them of the report to 101
• At the meeting, a risk assessment and navigation plan will be discussed alongside the Trust expectations and outcomes depending on the legal outcome following the report made.
• A MASH referral will be made regarding being named in police 101 report for any student under 18 years of age at time of disclosed incident or advice sought from MASH team if student is over 18 years of age at time of disclosed incident
• A named safeguarding coordinator will be assigned to support the perpetrator
• As per KCSIE we no longer refer to peer on peer abuse, we use the term child on child
• We are to be careful when using the word alleged perpetrator and victim and considered case by case.

APPENDIX I -Female Genital Mutilation – FGM and Breast Ironing

FGM includes procedures that intentionally alter or injure the female genital organs for nonmedical reasons.

There are four known types of FGM, all of which have been found in the UK:

Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)

Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina)

Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris.

Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping, and cauterising the genital area. FGM is sometimes known as 'female genital cutting' or female circumcision. Communities tend to use local names for this practice, including 'Sunna.'

Why is FGM carried out?

It is believed that:

• It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage.
• It preserves a girl's virginity/chastity.
• It is part of being a woman as a rite of passage.
• It upholds the family honour.
• It cleanses and purifies the girl.
• It gives the girl and her family a sense of belonging to the community.
• It fulfils a religious requirement believed to exist.
• It perpetuates a custom/tradition.
• It helps girls and women to be clean and hygienic.
• It is cosmetically desirable.
• It is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them 'a better Muslim.' However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and our local Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Breast ironing

Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is thought that about 1,000 girls in West African communities across the UK have been subjected to the practice, but the figure could be much higher. Community workers in London, Yorkshire, Essex, and the West Midlands have all reported cases of breast ironing, but the custom is extremely secretive and there is no official data on how widespread it is.

Appendix J – VAWG, Trafficking, forced marriage, trafficking and Faith Abuse

Violence against women and girls (VAWG) Violence directed specifically against females, and it can occur within an intimate relationship or within the family or community.

VAWG includes:

-domestic abuse and violence -honour-based abuse (including FGM and forced marriage) -stalking -gang-related violence -trafficking of girls and women -sexual abuse of female children in the household -intimate partner violence (including marital rape, sexual violence, and dowry related violence)

Men and boys can also be victims of gender-based violence and abuse.

Forced marriage.

A forced marriage is one that is entered into without a student's free and full consent. It is not the same as an arranged marriage; where both partners aged 16 or older freely consent. A female or male can be forced into marriage by parents, other relatives, or a religious leader; with coercion, emotional blackmail (e.g. being told they will bring shame on the family or be disowned by the family), threats or physical violence.

Kassie 2023 (Annex B) has been updated to refer to legal age of marriage changed to 18. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Motivations behind forced marriage include:

- Protecting 'family honour' -Financial gain - ensuring family keep land, property, and wealth.
- To conceal a child's true sexuality -Follow misguided cultural, traditional, or religious ideals.
- Assisting claims for residence and citizenship - Stop relationships or sex occurring outside marriage.

Trafficking (including Modern Day slavery)

Child trafficking involves the recruitment and transportation of a child into the UK from abroad, or from one part of the UK to another. A child may be trafficked for sexual exploitation, forced marriage, forced labour, criminal activity, or domestic servitude (e.g., excessive levels of household chores or caring for younger children). Unaccompanied migrant or asylum-seeking children who go missing could potentially be victims of trafficking. Traffickers may use grooming techniques to gain the trust of a child and may even promise the child's family a better life or education in another place. A child may be trafficked by an individual, a family member, or a network of traffickers.

Faith abuse

The mistreatment of a person by someone who claims a spiritual authority and can include practices around 'spirit possession' and 'witchcraft.' A child may be accused of being a 'witch' or 'possessed by an evil spirit' and subsequently blamed for occurrences. For example, they may be treated as a scapegoat for financial difficulties at home, a disability, behavioural problems, or illness. The abuser may attempt to 'exorcise' the victim of 'evil forces' via physical abuse. Victims of faith abuse can experience sexual, physical, and psychological abuse or neglect, and may present as very withdrawn, distressed, with little sense of self-worth.

APPENDIX K- online safety

The following are examples of electronic communication: Email Chat room Instant Messaging Video Conferencing Blogging/Micro Blogging Social Networking Text Messaging Use of eLearning The use of Microsoft Teams, Zoom and Google Classroom means we need to ensure that students and staff are safe.

Secure Remote Teaching

Before implementing any remote teaching solution, educators need to plan for their online classes. Teachers should:

- Regularly and frequently communicate with students regarding online classes and procedures.
- Revise class plans and content for the online learning environment.
- Ensure that department and student contact lists are up to date.
- Prepare a quiet and secure workspace that can be used for online teaching and collaboration sessions.
- Make sure they have a computer with functioning webcam and microphone.

Secure Communications

Secure communications involve protecting each device and each step of the process. Ideally, teachers and students should use only secure private Wi-Fi networks, not insecure public hotspots. Teachers should note that not all communication takes place in group chats or conferences. All 1:1 communication – whether text, audio, or video – also need to be secure.

Use of Photographs

The use of images or photographs is popular in teaching and learning and should be encouraged where there is no breach of copyright or other rights of another person. This will include images downloaded from the internet and images belonging to staff or students.

Staff will provide information to both students and staff on the appropriate use of the images and on the use of copyright. Our aim is to reinforce good practice as well as offer further information for all users on how to keep their personal information safe. Students will receive training as part of their personal safety lessons.

Sharing nudes and semi-nudes

All Trust staff should be aware that behaviours linked to sharing nudes and semi-nudes put a child in danger.

Curriculum - It is important that the wider community is sufficiently empowered with the knowledge to stay as risk free as possible whilst using digital technology; this includes updated awareness of new and emerging issues. E-Safety for students is embedded into the curriculum; whenever ICT is used in the academy, staff will ensure that there are positive messages about the safe use of technology and risks as part of the student's learning.

Filtering and Monitoring changes

All staff should receive appropriate safeguarding and child 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. The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- 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.

Appendix L - Domestic Abuse

The CPS definition is the generally accepted version, and now incorporates children - a key change of the DA Act 2021 updated the definition of a child experiencing abuse amongst parents in the home from witness to automatically being classed as victim.

[Domestic Abuse | The Crown Prosecution Service (cps.gov.uk)](https://www.cps.gov.uk)

All Trust staff should be aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. A child can be impacted by seeing, hearing, or experiencing domestic abuse. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Domestic abuse can have a detrimental and long-term impact on a child's health, well-being, development, and ability to learn.

Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships.

A child/young person living with DA may show their vulnerability in several ways. For example, children may feel fragile, confused, and frightened.

Support for young people affected by DA.

Children affected by DA may find it difficult to disclose what they have witnessed; this may affect their behaviour both in and outside Trust and in the wider community. Some children feel that it is not worth reporting their concerns, because they may have heard people they know and trust using phrases which minimise DA, such as 'just a domestic.' Other children may feel embarrassed to disclose, or they may feel afraid that they risk being taken away from their parents, guardians and carers if they do. Conflicts of loyalty may also be present. In addition, threats may have been made by the perpetrator, resulting in the child fearing the consequences for either themselves, or for a loved person, pet or possession.

Deciding when to refer – Domestic Abuse

In 2012, following a public consultation, the age limit in the cross-government definition of domestic abuse was lowered from 18 to 16, to recognise that young people can experience abuse in their relationships.

Domestic Abuse Statutory Guidance July 2022 https://www.cps.gov.uk/legal-guidance/domestic-abuse#:~:text=Domestic%20Abuse%20Definition.%20The,of%20others%20around%20them.

Domestic Abuse Definition. The domestic nature of the offending is an aggravating factor because of the abuse of trust involved. Victims will know and often live with, or have lived with, the offender and there may be a continuing threat to the victim's safety. In some cases, there is a threat to their life or the lives of others around them.

How we deal with alleged perpetrators

Allegations of DA may take time to resolve after disclosure. The alleged perpetrator may have parental responsibility and may continue to have dealings with us, e.g. by requesting information about their child, or by attending functions/information evenings. Perpetrators of DA may be very adept at manipulating opinion; they may present a different image in public to that faced by those in the home environment. Alleged perpetrators may use conversations with professionals to divert attention away from their behaviour and its consequences, and to focus inappropriately on the behaviour of others. However congenially or aggressively the alleged perpetrator presents to Trust staff, on no account should they mention the disclosure to him/her or challenge him/her about it.

Ways of supporting a child/young person after a disclosure has been made.

It is important to maintain a normal exchange of information with the non-abusing parent/carer, to support the child. In addition, any information relevant to the welfare of that child should be shared, using agreed

protocols, with other agencies involved in supporting the family, e.g. Locality team. For example, FLT/relevant agency may release information on:

- changes in, or unusual, behaviour
- any further disclosures, unless there is a suspicion that doing so would place the child at risk of significant harm.
- academic progress/difficulties
- progress with Trust and linked activities

Prevention of DA through awareness raising in all children and staff

The Women's Aid website offers downloadable resources within the 'Expect Respect' programme which can be used in a general or a targeted way: https://www.womensaid.org.uk/

Appendix M Lettings

Use of premises non-FLT activities are expected to meet the guidance in Keeping Children Safe in Out of School Settings FLT ensure we are aware of the nature of the groups using our premises.

We may receive an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities such as

- community groups
- sports associations
- service providers that run extra-curricular activities

FLT lettings team receive the appropriate Safeguarding training to help follow all the protocol set in this Policy to ensure they are aware of what is required of them and what process to follow if they have a safeguarding concern, or one is brought to them.

How we check lettings are suitable

- Collect information about hirers via a booking form (this is used to vet hirers, if in doubt we would say No)
- Update the Terms and conditions annually.
- Ask organisations to confirm that they have a safeguarding policy in place if applicable.
- Follow up promptly if any concerns were raised or inappropriate behaviour was observed.

Anyone engaging in regulated activity such as working with children or vulnerable children (work that barred person must not do) will be subject checks by their employers (including children's barred list information).

This will be obtained through checks and written assurance from the supplier organisation sent to the DSLs and the AP Finance and Resources. These checks will confirm that appropriate safeguarding, safer recruitment and DBS / vetting procedures are in place to the Trust. It will also conform who the lead point of contact for Safeguarding is for each provider. They are also aware of the DSL contact here at the Trust should they need to raise a concern.

Visitors to our site, including contractors and volunteers, are asked to sign in and are given an identity badge to confirm that they have permission to be on site. Furthermore, the identity of contractors will be checked upon arrival. The Single Central Record is maintained to ensure that all appropriate staff, volunteers, Governor's agency and contracted staff in Regulated Activity are entered on it.

Appendix N The Process

The below guidance sets out what procedures will be taken by ALL staff in the event of a safeguarding incident/ disclosure from a learner or a member of the public Safeguarding is EVERYONE'S responsibility.

Staff are to report ALL safeguarding incidents immediately to a member of the SG team Where a learner is directly involved, staff must remain with the learner or accompany them to Student Services Staff must provide all the relevant information to the SG team on My Concern The SG team member will take over the case and advise further what they may require The SG lead will take all relevant action to ensure the learner is removed from risk . All relevant agencies will be contacted to ensure the welfare of the learner Where necessary an update will be provided to the staff member Staff should continue to monitor the learner and again report any concerns back to the SG team Where an allegation is made about a member of staff all reports should go directly to the DSL The SG team will operate an emergency response to ALL SG incidents Staff are encouraged to raise their concerns regarding SG practice to the DSL

APPENDIX O Responsibilities

Responsibilities of the Trustee Board and Local Governing Body

The Trustees and Local Governing body will:

- Ensure the Trust's policy for safeguarding children and vulnerable adults and associated procedures are in place and implemented to ensure the welfare of the student cohort.
- Receive reports from the Senior Leadership Team (SLT) Designated Safeguarding Lead (DSL), identifying all training undertaken by members of the Trust, together with the number of learners who have safeguarding plans, or for whom we have safeguarding concerns.
- Receive and consult with the Local Authority Designated Office over any allegation made against the CEO or Senior Post Holders and report any actions, as appropriate, to the Chair of Governors. This will not involve undertaking any form of investigation but will require communication between parties and information to assist enquiries.

Responsibilities of the CEO

The CEO will:

- Ensure the Trust's Policy for Safeguarding children, and vulnerable adults and associated procedures are in place and implemented to ensure the welfare of learners.
- Delegate operational responsibility and implementation of procedures to the DSL
- Be responsible for receiving allegations against members of staff and volunteers and passing them on to the Human Resources Manager

• Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.
• If requested by the Designated Officer, and appropriate, become the point of contact for communication regarding an individual safeguarding matter concerning an allegation against a member of staff.
- Responsibilities of the Senior Leadership Team Designated Safeguarding Lead (DSL) The SLT Designated Safeguarding Lead is the Assistant Principal Student Services

The DSLs will:
- Ensure that the safeguarding policies and procedures are fully implemented across FLT and that staff fully understand their responsibilities and duties.

- Chair a termly Safeguarding Board to receive and monitor progress made in achieving the Trust's Safeguarding Action Plan
- Ensure that resources are allocated to enable the Assistant Designated Safeguarding Leads (ADSLs), as needed, to attend strategy discussion, interagency meetings and contribute to assessments.
- Ensure that members of staff have received training in line with their roles.
- Ensure that FLT responds appropriately to new legislation including the Counter Terrorism and Security Act (2015) and has due regard to the need to safeguard young people against potential radicalisation.
- Be responsible for receiving allegations against staff, contractors, volunteers and passing them on to the CEO and Human Resources Manager
- Ensure that the Human Resources Manager records details of all allegations against staff, contractors and volunteers and consults with the Designated Officer (DO) as appropriate, to ensure that allegations are dealt with in an objective and transparent way.
- Ensure that the Human Resources Manager carries out any agreed actions with the DO and reports on outcomes. This includes any contact and reporting to the Disclosure and Barring Service
- Collate and report on all safeguarding training undertaken by the Safeguarding Coordinators, and all other staff, together with the number of learners who have safeguarding plans, or for whom we have safeguarding concerns.
- Ensure that all Trust staff, volunteers and contractors are aware of the Trust's policy for safeguarding children and vulnerable adults and referral procedures and know how to recognise any concerns.
- Make known to every member of staff; temporary, contractors, volunteers, and every governor the names of the Safeguarding Coordinators and their roles.
- Provide supervision sessions for Safeguarding Coordinators

Responsibilities of the Assistant Designated Safeguarding Lead (ADSL/Safeguarding Coordinators)

The ADSLs will:

• Monitor and audit safeguarding practices across campus including the referral of cases externally and the centralised record of all safeguarding activity to ensure consistent and good practice
• Ensure that detailed and accurate written records are kept, even where that concern does not lead to an external referral
• Ensure that all such records are kept confidentially and securely
• Act as a focal point for staff concerns and liaison with other agencies and professionals
• Attend appropriate training as required to keep up to date with local and national issues and in fulfilling the role of ADSL
• Lead on the induction and refresher training for all staff
• Act as a focal point for staff concerns & Safeguarding Referrals and represent FLT at the Local Safeguarding Children's Board and disseminate to Trust safeguarding team.
• Oversee the referral of cases of suspected self-harm, harm to others or from others or allegations to the relevant investigating agency
• Monitor and audit safeguarding practices across FLT including the referral of cases externally to ensure consistent and good practice
• Keep the Central Safeguarding Register up to date and monitor the quality and timeliness of referrals to achieve the best outcomes for learners
• Ensure that Safeguarding team members receive appropriate training at least once every two years.
• Attend appropriate training as required to keep up to date with local and national issues and in fulfilling the role of an ADSL/ Safeguarding Coordinator.
• Attend the Safeguarding committee meeting and contribute to the Safeguarding Action Plan
• Liaise with Social Services and Children's Services in accordance with the Local Safeguarding Children Board procedures.

Responsibilities of the Safeguarding Team

The Safeguarding team members have a responsibility to:

• Act as a point of contact for staff on child and vulnerable adult protection issues and provide feedback to staff to ensure learning and improved outcomes for children

• Act as a point of contact for students studying in the Trust on issues relating to safeguarding

• Know how to make an appropriate referral on MyConcern

• Keep records of all contact and ensure these are passed on to the Safeguarding Coordinator (ADSL) via MyConcern

• Attend appropriate training at least once every two years as required by the role

• Participate in supervision sessions

• Contribute to the Safeguarding Action Plan

Responsibility of all Staff Members

All Staff have a responsibility to:

• Be alert to signs of self-harm, harm to others or from others, and report concerns immediately to a member of the Safeguarding team using the Safeguarding Referral process on MyConcern

• Ensure they do not promise confidentiality regarding information which might compromise the individual's safety or well-being or that of another

• Undertake appropriate training in relation to safeguarding and promoting the welfare of children and vulnerable adults at least once every three years.

• Read and refer to 'Keeping Children Safe in Education'

Appendix P Contacts

FRONTIER LEARNING TRUST Safeguarding team

Name

Name Safeguarding Role Telephone No.

e-mail address

Lola McDowell Designated Safeguarding Trustee: safeguardingtrustee@frontierlearningtrust.ac.uk

Deborah Ramm -Harpley -Interim Assistant Principal Student Services

Designated Safeguarding Lead (DSL) Ext 254 dramm-harpley@woodhouse.ac.uk

Ally Hillier Safeguarding Coordinator

Assistant Designated Safeguarding Lead Ext. 214 ahillier@woodhouse.ac.uk

Dimitria Moustaka Safeguarding Coordinator

Assistant Designated Safeguarding Lead Ext. 212 dmoustaka@woodhouse.ac.uk

Tim Grundy Deputy Headteacher ICLMS

Designated Safeguarding Lead (DSL) tgrundy@iclms.ac.uk

Sally Casson Additional Learning Support (ALS)

Assistant Designated Safeguarding Lead Ext 265 scasson@woodhouse.ac.uk

Kim Mason ALS team Ext. 255 kmason@woodhouse.ac.uk

Heads of Year and Safeguarding Team

Colin Passfield Ext. 223 cpassfield@woodhouse.ac.uk

Nathan Cook Ext. 320 ncook@woodhouse.ac.uk

Hannah Johnston Ext. 260 hjohnston@woodhouse.ac.uk

Polina Andreeva Ext   239   pandreeva@woodhouse.ac.uk

Main email contact is safeguarding@ICLMS.ac.uk and safeguarding@woodhouse.ac.uk

Police Public Protection Unit:

24hrs non-emergency 101

Emergency 999

NSPCC Helpline 0808 800 500

 Barnet Safer Schools Police Officers (Mon-Fri 8am-5pm) 0208 733 5857