

Child Protection and Safeguarding Policy (including safer recruitment, allegations against staff and low-level concerns)

Crisp Vocational Provision



Crisp Vocational Provision Ltd
Building futures for tomorrow

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Amber Norwood	amber@crispvocationalprovision.co.uk 07427 854255 0115 979 4045

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Deputy DSL	Andrew Hawksworth Catherine Hughes Kev Crisp Paolo Piliero Helen Greeves	andrew@crispvocationalprovision.co.uk catherine@crispvocationalprovision.co.uk kev@crispvocationalprovision.co.uk paolo@crispvocationalprovision.co.uk helen@crispvocationalprovision.co.uk 0115 9794045
Proprietary Body Member (Unpaid, voluntary role)	Adrianne Carter	adrianne@crispvocationalprovision.co.uk
Mental Health First Aiders	Holly Williams Andrew Jones	
Local authority designated officer (LADO)	LADO@nottinghamcity.gov.uk 0115 876 5166	
Local Authority Provision Education Co-Ordinator	Claire Maclean	Claire.Maclean@nottinghamcity.gov.uk 0115 8764749
Channel helpline	020 7340 7264	
Nottingham City Multi-Agency Safeguarding Hub (MASH)	0115 876 4800 or email: citymash@nottinghamcity.gov.uk	
Nottinghamshire Multi-Agency Safeguarding Hub:	0300 500 8090	
NSPCC Whistleblowing Advice Line	0800 028 0285	

1. Aims

Crisp Vocational Provision aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping children safe in education 2026 \(comes into force from 1 September 2026\)](#) , [Help for early years providers : Changes to the EYFS framework from 1 September 2026](#) and [Working together to safeguard children - GOV.UK](#) and the [Maintained provisions governance guide](#) . We comply with this and all other government legislation and guidance alongside arrangements agreed and published by our Local Safeguarding Children Partnership.

Provisions (including independent provisions, non-maintained special provisions, academies and free provisions) and Further Education (FE) institutions should give effect to their duty to safeguard and promote

the welfare of their pupils under section 175/157 the Education Act 2002 and where appropriate under the Children Act 1989 by:

- Creating and maintaining a safe learning environment for children and young people; and,
- Identifying where there are child welfare concerns and taking action to address them, in partnership with other organisations where appropriate.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#) places a duty on provisions and local authorities to safeguard and promote the welfare of pupils.
- [The Provision Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a provision interview/appointment panel to be trained in safer recruitment techniques.
- Part 3 of the schedule to the [Education \(Independent Provision Standards\) Regulations 2014](#), which places a duty on academies and independent provisions to safeguard and promote the welfare of pupils at the provision.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- Statutory [Guidance on the Prevent duty](#), which explains provisions' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- Guidance for safer working practice for those working with children and young people in education settings (GSWP) (Safer Recruitment Consortium Feb 2022) [Guidance for safer working practice for those working with children and young people in education settings February 2022](#)
- [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK \(www.gov.uk\)](#)
- [Safeguarding and remote education during coronavirus \(COVID-19\) \(DfE, 2021b\)](#)
- [Children Missing Education – Statutory guidance for local authorities \(DfE August 2024\)](#)
- [When to call the police – Guidance for provisions and colleges \(NPCC – 2020\)](#)
- [Education and Training \(Welfare of Children\) Act 2021](#)
- [Alternative Provision Guidance February 2025](#)
- [Working together to improve provision attendance - GOV.UK](#)

3. Links with other policies

This policy links to the following policies and procedures:

- Anti Bullying
- Attendance
- Behaviour
- Curriculum
- Staff Code of Conduct

- › Complaints
- › Data Protection Complaint Handling Policy
- › Health and Safety
- › Drug and Substance Misuse Policy
- › E-Safety
- › Artificial Intelligence (AI)
- › RSE
- › Equality, Diversity & Inclusion
- › First Aid
- › SEND
- › Data Retention
- › Children in Care/Previous Children in Care
- › Privacy Notices
- › Student Supervision
- › Social Media
- › Whistleblowing
- › Acceptable Use of IT

4. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are identified as suffering, or being at risk of suffering significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Child(ren) includes everyone under the age of 18.

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

- › The local authority (LA) as defined by the child's home address
- › Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- › The chief officer of police for a police area in the LA area

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

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

5. Equality statement

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

We give special consideration to children who are:

- disabled or who have special educational needs (SEN)
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- homeless
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- within the court system
- have a family member in prison
- at risk of criminal exploitation
- at risk of being drawn into extremism

Due to the nature of our provision, every child who attends Crisp Vocational Provision is given special consideration.

6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and visitors in the provision and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended provision and off-site activities.

Effective safeguarding of children can only be achieved by putting children at the center of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children, in line with Working Together 2023 and Keeping Children Safe in Education 2026.

The Proprietary Body should ensure children are taught how to keep themselves and others safe, including online. Preventative education should be taught as part of a whole provision approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for discrimination, harassment and abuse of any kind. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues as they arise such as:
 - Healthy and respectful relationships, including how to recognise coercive, controlling or abusing relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality, including bullying behaviours
 - Substance misuse
 - Serious violence prevention
 - Body confidence and self-esteem

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

6.1 All staff

All staff will:

- read and understand a minimum of Part 1 of [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Sign a declaration when first starting work at Crisp Vocational Provision and then at the beginning of each academic year to say that they have reviewed the most up to date guidance
- Report any concerns to the DSL
- Know how to respond when they have concerns or when a student discloses to them.
- Be aware and alert to signs and symptoms of harm and abuse.
- Recognise that abuse and neglect can happen and maintain an attitude of 'it could happen here'.
- report to the DSL where they see or suspect that unacceptable content is being accessed online despite filtering and monitoring systems
- Staff will be aware a child being absent from provision is a potential indicator of abuse or neglect and, as such, these pupils are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, FGM or radicalisation. Staff will monitor pupils that are absent from provision, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, and in accordance with the Attendance Policy.

Section 17 and appendix 4 of this policy outline in more detail how staff are supported to do this.

6.2 The designated safeguarding lead (DSL)

Our DSL, **Amber Norwood**, is a member of the senior leadership team and therefore has the authority to carry out the duties of the position. Our DSL is appropriately trained and attends regular update training through the local authority.

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

During provision holidays, Crisp Vocational Provision ensures that adequate and appropriate cover arrangements are in place. The safeguarding team will monitor the safeguarding email daily.

The safeguarding team email is: safeguarding@crispvocationalprovision.co.uk

The DSL will:

- Take lead responsibility for child protection and wider safeguarding in the provision
- Act as a source of support and expertise and provides advice to staff within the provision
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Ensure that they, and any deputies, have a complete safeguarding picture of the provision
- Monitor all safeguarding concerns and escalates any concerns meeting threshold for further interventions or assessment
- Keep detailed written records of all concerns using CPOMS
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have an overview of all safeguarding concerns and follows the procedures set out in local guidance and Keeping Children Safe in Education to ensure that appropriate action is taken

- Take lead responsibility for the filtering and monitoring systems and processes in place at Crisp Vocational Provision
- Ensure that all staff receive the appropriate training, and keep it up to date
- Make staff aware of training courses and the latest policies on safeguarding
- Ensure the child protection policy and procedures are reviewed and updated annually or in line with changes in statutory guidance
- Work closely with the commissioner and inform their DSL at the earliest opportunity of any concerns that arise regarding their student(s), along with updating them of any actions taken
- Liaise with the headteacher and proprietary body as appropriate
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- be aware of what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Make the Child Protection and Safeguarding policy available publicly, on the Crisp Vocational Provision website
- ensure all staff, including supply staff, visiting professionals working with pupils in the provision and volunteers are informed of the names and contact details of the designated leads and the provision's procedures for safeguarding children.

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

6.3 Deputy Designated Safeguarding Lead (DDSL)

Our DDSLs are: **Kev Crisp, Paolo Piliero, Andrew Hawksworth** and **Catherine Hughes**.

At Crisp Vocational Provision, our DDSLs are all members of the senior leadership team.

DDSLs are trained to the same level as the DSL and, in the absence of the DSL, carry out the duties necessary to ensure the ongoing safety and protection of all students.

In the event of long term absence of the DSL, the deputies will assume all of the functions above.

6.4 The Headteacher

The headteacher will:

- Ensure that the child protection policy and procedures are understood and implemented by all staff
- Allocate appropriate time, funding, training and resources to enable the DSL to carry out their role effectively and ensure that there is always adequate cover by a DDSL if the DSL is absent
- Ensure that students are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum
- Ensure that the culture of Crisp Vocational Provision will promote the welfare of all students
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures

6.5 The Proprietary Body

The Proprietary Body has a trained member for safeguarding, Adrienne Carter. They will:

- Have an up to date and enhanced DBS check.

- Attend training/updates at least every three years and will receive the regular safeguarding updates referred to above.
- ensure a member of the governing body is nominated to liaise with the local authority and/or partner agencies on issues of child protection in relation to safeguarding and in the event of allegations of abuse made against the Headteacher, the Principal of a college or proprietor or member of governing body of an independent provision.
- ensure that the provision has a child safeguarding policy, single central record, staff conduct policy and procedures in place.
- ensure the provision/college keeps an up-to-date single central record of pre-employment checks, specifying when the check was made and when it will be renewed.
- ensure that they develop a safeguarding culture and facilitate a whole provision approach to safeguarding.
- ensure that all safeguarding processes and policies operate with the best interests of the child.
- ensure that the child's wishes, and feelings are taken in to account when action is determined by provision leaders.

6.6 Students

All students are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

Provision adopts an open and accepting attitude towards students as part of our responsibility for pastoral care. Students will be free to talk about any concerns and will see the provision as a safe place when there are difficulties. Students' worries and fears will be taken seriously, and students are encouraged to seek help from provision staff.

Through PSHE, Form Time and other curriculum opportunities, students are helped to talk about their feelings, know about their rights and responsibilities, understand and respond to risks, to deal assertively with pressures and know who they can turn to for advice and help both in and out of the provision.

Students will cover the following areas within PSHE and the wider curriculum –

- Bullying, including cyber-bullying, child-on-child abuse and upskirting
- Online safety
- Healthy relationships and sexual harassment
- Radicalisation and extremism and hate crime
- Anti-social behaviour
- Artificial Intelligence (AI)
- the risks associated with sharing indecent images of, or information about, themselves. This is something that is often referred to as Sexting.

7. Confidentiality

Crisp Vocational Provision recognises the importance of proactive information sharing between professionals and external agencies to meet children's needs and to identify early help.

Timely information sharing is essential to effective safeguarding and all concerns will be reported to the DSL or deputies in the DSL's absence. Concerns and reports will only be shared with other staff and/or external agencies on a need to know basis.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within the provision or with external agencies. Where there is good reason to do so, the DSL may share information without consent and will record the reason for not obtaining consent.

Staff will not promise a child complete confidentiality - instead they must explain that they may need to pass information to other professionals to help keep the student or other students safe.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.' (Keeping Children Safe in Education, 2026, page 40, paragraph 145 & 146)

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

Confidentiality is also addressed in this policy with respect to record-keeping in section 8, and allegations of abuse against staff in appendix 3

8. Record-keeping

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

At Crisp Vocational Provision, we use CPOMS as our recording system for all safeguarding concerns. Once a member of staff records a concern on CPOMS, it automatically alerts the DSL to the concern. Each child has their own individual child protection file on CPOMS. These are kept secure by only being available to those who have a right or if a professional needs to see them.

All safeguarding concerns, discussions, decisions made / actions taken (including any referrals made), and the rationale for these decisions and actions, must be recorded on CPOMS.

If a member of staff, volunteer or visitor is in any doubt about whether to record something, they understand that they can discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

As students are placed at our provision by their commissioner. Crisp Vocational Provision will frequently share records with the commissioner to ensure the commissioner's safeguarding team are aware of any concerns or records kept on file as the child remains on their roll.

If we are the last educational setting that a child attends, we will keep their records until they are 25 years old. Should a child move to another educational setting we will ensure their records are transferred to the commissioner to support them in transferring the records to the other setting, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will work alongside the commissioner and speak to the DSL of the receiving provision or provision and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Please see our Data Retention Policy for further details relating to record-keeping.

9. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation.

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSLs)”.

Staff should always maintain an attitude of "it could happen here".

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary, call 999;
- report your concern as soon as possible to the DSL, definitely by the end of the day;
- do not start your investigation;
- Share information on a need-to-know basis only – do not discuss the issue with
- colleagues, friends or family;
- complete a record of concern in writing (to the DSL) (via CPOMS);
- seek support for yourself if you are distressed.

Any verbal conversations around safeguarding should be recorded in writing and shared with the DSL.

Staff should be familiar with *‘What to do if you’re worried a child is being abused’*.

9.1 Referrals

Any concern should be discussed in the first instance with the Designated Safeguarding Lead or Deputy Leads in their absence, as soon as possible. If at any point, there is a risk of immediate serious harm to a child, a referral should be made to City MASH or the police immediately.

Anyone can make a referral, however at Crisp Vocational Provision, staff are reminded to liaise with the DSL as they will have full overview and chronology of all concerns that have been logged.

Nottingham City Multi-Agency Safeguarding Hub:

[Multi Agency Safeguarding Children Hub \(MASH\) - Nottingham City Council](#)

Email: citymash@nottinghamcity.gov.uk

Tel: 0115 915 5555

Out of hours contact number - 0115 915 9299

Nottinghamshire Multi-Agency Safeguarding Hub:

[Multi-Agency Safeguarding Hub \(MASH\) | Nottinghamshire County Council](#)

Tel: 0300 500 8090

Out of hours contact number – 0300 456 4546

GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

If it is appropriate to refer the case to local authority children’s social care or the police, the DSL will make the referral or support you to do so.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

Crisp Vocational Provision will follow local procedures for referrals and escalations. Details for Nottingham City & Nottinghamshire County can be found below:

[Nottingham City Multi-Agency Safeguarding Hub](#)

Crisp Vocational Provision will gain explicit and informed consent for information to be shared with other agencies. Services cannot accept a referral without consent, unless there are safeguarding concern whereby there is a statutory duty to intervene and seeking consent may put the child at further risk. In situations where there are concerns that a child is suffering, or is likely to suffer significant harm, information may be shared without consent.

Early help assessment

If an early help assessment is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the provision will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Crisp Vocational Provision will follow the local early help process as required. Procedures for early help may include:

- Referral to the Alternative Provision Taskforce
- CAMHS
- MARF

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

There will be times where you may have concerns that a child may be at risk.

Children may display changes in behaviour or produce work that suggests concerns particularly in creative subjects such as in art or writing stories or music. Physical signs may also be noticed.

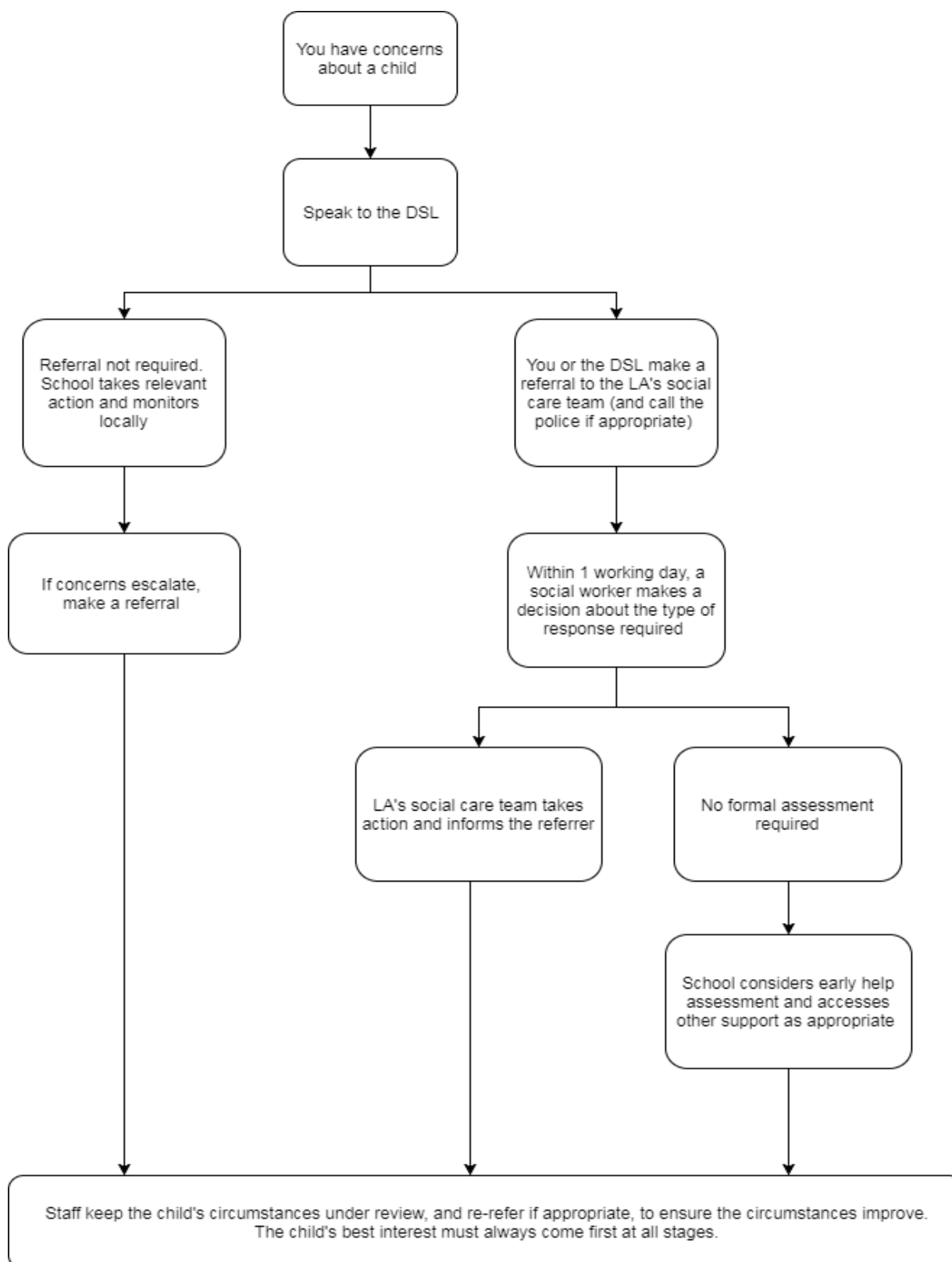
Staff will ask the child if they are OK and will give them the opportunity to talk. Staff will also ask if there is anyway they can help.

Staff will speak to the DSL first to agree a course of action and record the concern(s) on CPOMS for the DSL to follow up and action. The record on CPOMS should be factual and evidence based.

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

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 9.4 for what to do.)



9.3 If a child makes a disclosure to you

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

- Allow the child to speak openly and freely

- Listen to and believe them.
- Stay calm and do not show that you are shocked or upset
- Reassure and tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Do not, under any circumstances ask leading or investigative questions
- At an appropriate time, explain what will happen next and that you will have to pass this information on to the DSL and explain why. Do not promise to keep it a secret
- Report verbally to the DSL, even if the child has told you they will speak to DSL themselves
- Record the conversation on CPOMS as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

It takes a lot of courage for a child to disclose that they are being abused. It is important to bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- Have lost trust in adults
- Believe or have been told that the abuse is their fault

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

9.4 If you discover that FGM has taken place or a student is at risk of FGM

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

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

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

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out should must personally report to the police and discuss any such cases with the DSL and Children's Social Care.

9.5 Preventing Radicalisation

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause'

- The Prevent Lead for Crisp Vocational Provision is: **Amber Norwood**
- The Prevent Officer for the Local Authority is: **Louise Cox** – louise.cox@nottinghamcity.gov.uk / 0115 876 5864

The PREVENT Strategy aims to:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation which we need to address

If a child is suffering or likely to suffer from harm, or in immediate danger, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team who will seek advice from local authority children's social care.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in students' behaviour.

9.6 If you have a concern about mental health

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by speaking to the DSL. However, in an emergency, call 999.

If you have a mental health concern that is **not** also a safeguarding concern, speak to one of the mental health first aiders to agree a course of action. The mental health first aider will still record the concern on CPOMS along with the actions they have taken.

9.7 Concerns about a staff member, supply teacher, or contractor

If you have concerns about a member of staff (including a supply teacher, or contractor), or an allegation is made about a member of staff (including a supply teacher, or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the proprietor.

The headteacher/proprietor will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, or contractor) to the headteacher and proprietor, report it directly to the LADO.

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

9.8 Allegations of abuse made against other students

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

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

Crisp Vocational Provision will respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online.

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

- Is serious, and potentially a criminal offence
- Could put students in the provision at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering provision transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in provision and minimising the risk of child-on-child abuse

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

At Crisp Vocational Provision we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in provision, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

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

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

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

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

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

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

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another provision, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

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

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the images or videos is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded via our electronic safeguarding system (CPOMS).

Curriculum coverage

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the provision will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

9.10 Reporting systems for our students

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

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

To achieve this, we will:

- Put systems in place for students to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

10. Online safety and the use of mobile technology

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

Crisp Vocational Provision uses an effective whole provision approach to Online Safety to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate concerns where appropriate.

To address this, our provision aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff and volunteers.
- Protect and educate the whole provision community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole provision community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

At Crisp Vocational Provision we ensure that we meet the Digital and Technology Standards as detailed in the DFE publication 'Meeting digital and technology standards in provisions' 2023

[Meeting digital and technology standards in provisions and colleges - Filtering and monitoring standards for provisions and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/meeting-digital-and-technology-standards-in-provisions-2023)

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories

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

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

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

To meet our aims and address the risks above, we will educate students about online safety as part of our curriculum. For example:

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

- › Keeping personal information private
- › How to recognise unacceptable behaviour online
- › How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim
- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- › Educate parents/carers about online safety via our website, social media and communications sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras. Staff are allowed to bring their personal phones to provision for their own use, but will limit such use to non-contact time when students are not present. Staff will not take pictures or recordings of students on their personal phones or cameras
- › Make all students, parents/carers, staff and volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet in provision, use of the provision's ICT systems and use of their mobile and smart technology
- › Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- › Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the provision's IT systems.
- › Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our provision community
- › Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- › Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

10.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Crisp Vocational Provision recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose students to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Crisp Vocational Provision will treat any use of AI to access harmful content or bully students in line with this policy and our anti-bullying/behaviour/artificial intelligence policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the provision. Our provision's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

11. Notifying parents or carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

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

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

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

12. Students with special educational needs, disabilities or health issues

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

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

We offer extra pastoral support for these students. This includes (but is not limited to):

- Interventions (1:1 and small groups) with a member of the engagement team
- Referrals to external agencies (if/when appropriate)
- Individual learning plans

We offer our pastoral support on an individual basis and will assess the needs of each student to ensure we are offering the most appropriate support.

Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO.

13. Students with a social worker

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

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

14. Children in Care (Previously known as LAC) and Children Previously in Care

Supporting children in care and children who have been in care is a key priority for our provision. We recognise that the needs of this group of children can only be effectively met when all agencies work together.

To ensure we have a coordinated approach to meeting the needs of children in care who attend our provision we have a designated lead for children in care.

Our designated lead for CIC is **Natasha Wardhaugh**. Our designated lead for CIC will:

- Attend PEP reviews
- Ensure children receive the correct provision, support and intervention and review frequently
- Work closely with the Virtual Provision
- The DSL has details of children's social workers and relevant virtual provision heads

Our DSL, will:

- Ensure that any safeguarding concerns regarding children in care and children previously in care are quickly and effectively responded to
- Ensure that appropriate staff have relevant information about children's care status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

14.1 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Provisions have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although provisions have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the provision. However, it should be clear to the provision who has parental responsibility.

Provision staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

On admission to the provision, we will take steps to verify the relationship of the adults to the child who is being registered.

15. Students who are lesbian, gay, bisexual or gender questioning

We recognise that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

At Crisp Vocational Provision, we have a LGBTQ+ Pastoral Lead, **Amber Norwood**, who will champion for LGBTQ+ students.

When families/carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the student). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where students can speak out or share their concerns with members of staff.

16. Complaints and concerns about CVP's safeguarding policies

16.1 Complaints against staff

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

16.2 Other complaints

At Crisp Vocational Provision we have a [Complaints Policy](#) which sets out how to raise a complaint to the provision along with how this will be handled. This can be found on our [policies page](#) on our website.

16.3 Whistle-blowing

Our whistle-blowing policy can be found in the Staff Handbook.

17. Training

17.1 All staff

The governors recognise that all staff and volunteers who work with pupils aged up to 18 years need to have appropriate child safeguarding training that equips them to recognise and respond to pupil welfare concerns.

We will ensure staff are given mandatory safeguarding training at point of induction, which includes familiarisation with child safeguarding policy, Part 1 of Keeping Children Safe in Education, staff behaviour policy, the designated leads in the provision, their responsibilities and procedures to be followed. Staff will then undertake training each September. Additional training will be delivered by the DSL or external agencies throughout the academic year during teaching and learning sessions.

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

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

17.2 The DSL and deputies

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

In addition, the DSL will update their knowledge and skills at regular intervals and at least annually to keep up with any developments relevant to their role through inter-agency training, attending local authority network meetings or taking time to read and digest safeguarding developments as part of their continuing professional development.

The DSL will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

17.3 Proprietary body

CVP's proprietary body receives training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

Have the knowledge and information needed to perform their functions and understand their responsibilities

Can be assured that safeguarding policies and procedures are effective and support the provision to deliver a robust whole-provision approach to safeguarding

As the proprietary body may be required to act as the 'investigating officer' in the event that an allegation of abuse is made against the headteacher or proprietor, they receive training in managing allegations for this purpose and would liaise with the LADO.

17.4 Recruitment – interview panels

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

Safer recruitment training has been attended by **Catherine Hughes** and **Amber Norwood**.

See appendix 2 of this policy for more information about our safer recruitment procedures.

18. Monitoring arrangements

This policy will be reviewed and updated as guidance from the local authority or DfE is updated, and as a minimum **annually** by **Amber Norwood** – Designated Safeguarding & Attendance Lead.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safer recruitment policy

Recruitment and selection process

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

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

Advertising

All vacancies are advertised through the TES website.

When advertising roles, we will make clear:

- Our provision's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- As our application forms are a standard template from TES, our website is linked on the advert and an additional link to all policies on the website is provided.

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Confirmation of the above is asked as part of the interview process.

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

Seeking references and checking employment history

We will obtain references before interview if it is possible to do so. Any concerns raised will be explored further with referees and taken up with the candidate at interview if permission is given by the referee.

When seeking references we will:

- Not accept open references
- Only accept references received from a work/company email address

- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is education based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed
- Ring the referee to confirm the information provided in the written reference whenever there is any doubt, inconsistency, or risk-related concern.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate but will visually check the certificate and record the DBS number on our SCR – if we have not received their DBS prior to their start date, the member of staff will not be left alone in regulated activity with children
- Obtain a separate barred list check if they will work in regulated activity
- Verify their right to work in the UK
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, proprietor and senior leadership team.

Regulated activity means a person who will be:

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

- Carrying out paid, or unsupervised unpaid, work regularly in a provision or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

- In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:
- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the provision un has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will visually check the DBS for self-employed contractors.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the provision.

Proprietary body

CVP's proprietary body will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise students on work experience

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

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

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of provision

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our LADO.

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

An 'investigating officer' will lead any investigation. This will be a member of SLT or the proprietary body where the headteacher or proprietor is the subject of the allegation. The investigating officer will be identified at the earliest opportunity.

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

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

Suspension of the accused until the case is resolved

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

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

- Adjusting the child or children's timetable so they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Implementing additional staffing so as not to leave the individual alone with students

If in doubt, the investigating officer will seek views from HR and the LADO, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

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

False: there is sufficient evidence to disprove the allegation

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

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The investigating officer may, on occasion, consider it necessary to involve the police *before* consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the investigating officer will notify the LADO as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the investigating officer will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the provision is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate
- Where the investigating officer is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the provision and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in provision and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Should the individual want someone to turn to for support or advice, they can contact ACAS or speak with a trusted colleague or individual outside of the organisation. Further information relating to external support services can be found on the Staff Wellbeing Board, located in the meeting room.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The investigating officer will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a member of staff will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- If the provision is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from being on provision site, pending the findings of the investigation by the Teaching Regulation Agency.

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

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The headteacher or proprietor will discuss with the agency whether it is appropriate to suspend the individual while the provision carries out the investigation
- We will involve the agency fully, but the provision will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

If the individual concerned is a qualified teacher, the provision will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the provision will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and investigating officer will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the provision will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The investigating officer will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

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

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

For further information on data retention, please see our Data Retention Policy.

References

When providing employer references, we will:

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

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

Learning lessons

After any cases where the allegations are *substantiated*, the investigating officer will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the provision's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the investigating officer will consider the facts and determine whether any improvements can be made. If appropriate, depending on the nature of the allegation, SLT may evaluate collectively.

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the provision
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 9.7 of this policy
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the provision's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

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

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the LADO.
- Retained at least until the individual leaves employment at the provision
- Where a low-level concern relates to a supply staff member or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

For further information on data retention, please see our Data Retention Policy.

References

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

The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or

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

Appendix 4: specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

Contacted by an online account that they do not know but appears to be another child or young person
Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images

Moved from a public to a private/E2EE platform

Coerced/pressured into doing sexual things, including creating nudes and semi-nudes

Offered something of value such as money or gaming credits

Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

Use images that have been stolen from the child or young person taken through hacking their account

Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the commissioner who will inform the local authority if a child leaves the provision without a new provision or setting being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

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

County Lines

Criminal exploitation of children (CEC) is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

When children are not attending education, the risk that they could be exploited either criminally and/or sexually is heightened. In line with the Local Authority procedures, we will liaise with the commissioner for a CME (child missing in education) referral to be made. When the child returns to provision, all staff must be aware of the signs and symptoms of trauma and refer any concerns swiftly.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of education. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 9.8 and 9.9 set out more detail about our provision's approach to this type of abuse.

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in provision (usually the DSL) before the child or children arrive at provision the following day. This is the procedure where police forces are part of Operation Encompass.

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

Homelessness

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

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

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

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

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

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

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

FGM

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

Section 9.4 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

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

- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from provision or education
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

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

The DSL will:

- › Speak to the student about the concerns in a secure and private place
- › Activate the local safeguarding procedures and refer the case to the LADO
- › Inform the commissioner or local authority who have placed the student at our provision
- › Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmfu@fco.gov.uk
- › Refer the student to receive appropriate support as required

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism 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 outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Provisions have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and

terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves
- › Becoming susceptible to conspiracy theories and feelings of persecution
- › Changes in friendship groups and appearance
- › Rejecting activities they used to enjoy
- › Converting to a new religion
- › Isolating themselves from family and friends
- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on Facebook or Twitter
- › Possessing extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a student, they will follow our procedures set out in section 9.2 of this policy, including discussing their concerns with the DSL.

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

Incels Community

The definition of Incels is:

A member of a sprawling online community. Incels are men who describe themselves and “involuntary celibates”.

Possible indicators of Incels involvement could include:

- › Derogatory comments/writings/drawings about women
- › Social isolation/exclusion and general signs of radicalisation

If staff have any concerns about a student being involved with the incel community or sharing incel ideology, they must report this immediately to the DSL or deputies.

Sexual violence and sexual harassment between children in education

Sexual violence and sexual harassment can occur:

Between 2 children of any age and sex

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

Online and face to face (both physically and verbally)

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

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the provision that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 9.8 and 9.9 set out more detail about our provision's approach to this type of abuse.

Serious violence

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

- Increased absence from education
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

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

Checking the identity and suitability of visitors

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

Visitors are expected to sign in using our electronic signing in system and wear a visitor's badge.

Visitors to the provision who are visiting for a professional purpose, such as educational psychologists, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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