

Dukes Plus Consultancy

Safeguarding and Child Protection Policy

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1. Introduction

This Policy is reviewed annually by the Directors of Dukes Plus Consultancy with support and guidance from the Dukes Plus Safeguarding Advisory Board.

It has been updated with having due regard to *Keeping Children Safe in Education* KCSIE **September 2023**.

This policy covers Dukes Education Ltd of 14 Waterloo Place, London, SW1Y 4AR, trading as “Dukes Plus Consultancy”, “A-List Education”, “Oxbridge Applications”, “The Lawyer Portal”, and “The Medic Portal”.

Dukes Plus Consultancy will operate safeguarding procedures in line with our locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners.

ALL staff have a duty to maximise the welfare, health, and safety of anyone in our care and to take immediate action to protect them from harm or any risk of harm.

Dukes Plus Consultancy recognises its responsibilities for all aspects of safeguarding and child protection and the safety of child or young persons is always accorded the highest priority, whether they attend face to face or online.

All staff understand that safeguarding is “everyone’s responsibility” and must act swiftly when any concerns are disclosed, or events witnessed.

This policy applies to all children / child or young person attending any event, residential camp or online service provided by our company.

2. Relevant Statutory and Non-Statutory Advice.

This Policy is written with regards to the following guidance:

1. Keeping Children Safe in Education 2023
2. Working Together to Safeguarding Children 2023
3. Prevent Duty 2015

3. Key Personnel for Safeguarding and Child Protection

Designated Safeguarding Lead (DSL):

Name	Theo Boyce
Telephone / Extension:	0207 499 2394
Mobile (for emergency use out of hours or on our residential course only):	07990 533 091
Email:	Theo.boyce@dukeseducation.com

Designated Deputy Safeguarding Leads (DDSL):

Name	Sofia Radaelli
Telephone / Extension:	0207 499 2394
Mobile:	-
Email:	sofia.radaelli@oxbridgeapplications.com

Name	Simon Pedley
Telephone / Extension:	020 8834 4579
Mobile:	-
Email:	simon@themedicportal.com

Name	Kate Auty
Telephone / Extension:	020 3004 8101
Mobile:	-
Email:	kate.a@alisteducation.co.uk

4. Key External Agencies, Services and Professionals' Contact Details

Any referral to authorities will normally be made to the child's local Children's Safeguarding Partnership.

Any concerns regarding a member of staff working with children would be made to the LADO within the local authority in which the member of staff is operating professionally.

Advice Lines for Parents / Carers / Child or young persons

Childline	0800 1111
NSPCC	0808 800 5000
Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk

Our organisation works with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

Please remember **anyone** can make a referral directly to children's social care or the Local Authority Designated Officer if they believe that a child is at risk or may be at risk of significant harm. If a direct referral is made by a member of staff, the DSL should also be informed as soon as possible.

5. Safeguarding Reporting Summary

Concern / allegations about or from a child	Concern / allegations about any staff member including DSL
↓	↓
DSL or DDSL	Director of Dukes Plus Consultancy Alison Bissell +44 (0)7408 7273, ext. 2003 alison.bissell@dukeseducation.com
↓	↓

Local Authority Children's Services for advice / next steps	Local Authority Designated Officer (LADO) for advice / next steps
If a crime has been committed or suspected of being committed, make the referral straight to the Police first (dial 101) and then inform the DSL of actions taken.	

The DSL/Director of Dukes Plus Consultancy may take advice from Mr Paul Ludlow, Dukes Plus Safeguarding Advisor, or any member of the Safeguarding Advisory Board.

See APPENDIX 2 for safeguarding log, also available to download separately.

6. Aims

The aims of this policy are:

- a) To ensure that effective safeguarding procedures are in place and are followed by all staff in accordance with national guidance and the locally agreed inter-agency procedures.
- b) To provide a systematic means of monitoring children / young people known or thought to be at risk of harm, as well as support for those children / young people.
- c) For all staff to be fully aware and confident of their role in safeguarding and child protection and of their responsibilities to identify and report possible concerns about the welfare of children / young people, including possible harm or abuse
- d) For all staff to be fully aware of the need to report any concerns about the actions of members of staff, volunteers, visitors, or contractors.
- e) To promote effective working relationships with other agencies
- f) To ensure that all staff are recruited in accordance with the companies Recruitment Policy

Dukes Plus Consultancy will also create a positive ethos to:

- a) Establish and maintain an environment where all young people feel secure, are encouraged to talk, and are listened to.
- b) Ensure staff are confident to report any concerns and to deal with any disclosures
- c) Have methods in place which make it easy for children / young people to report concerns as well as ensuring that all children / young people know they can talk to any adult in the company if they are worried.

7. The Designated Safeguarding Lead

Dukes Plus Consultancy has appointed a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) and have the necessary status, training and authority to be responsible for matters relating to the welfare of child or young persons, including child protection.

Responsibilities of the DSL

Dukes Plus Consultancy isn't a school but aims to follow the guidance set out in Keeping Children Safe in Education.

- a) To promote a culture of safeguarding so the welfare and best interests of young people is embedded within all the company's processes and procedures.
- b) To co-ordinate and monitor safeguarding, being the first point of contact for parents, child or young persons, staff, and external agencies.
- c) To liaise with any Safeguarding Children's Partnership and other Children's Services departments and the police.
- d) To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- e) To ensure the Directors of the company are fully informed about safeguarding concerns including any referrals.
- f) To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- g) To be responsible for procedures in Dukes Plus Consultancy and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.
- h) To provide a systematic means of monitoring and supporting young people known or thought to be at risk of harm or where there are ongoing concerns.
- i) To maintain a regular training programme for all members of staff.
- j) To ensure all new staff receive induction training in safeguarding and understand their responsibilities as well as have received a copy of KCSIE Part 1 and / or **Annex A**.
- k) To ensure that all staff have confirmed that they have been provided with, read and understood a copy of the Safeguarding Policy (i.e., this document), KCSIE Part 1, **Annex A** as well as **Annex B** if they lead or manage or work directly with children have read and understood them.
- l) To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- m) To ensure the Safeguarding Policy is reviewed annually in conjunction with the Director of Dukes Plus Consultancy with the support of the Dukes Plus Safeguarding Advisor.

8. The Deputy DSLs

The Deputy DSLs are trained to the same level as the DSL and in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children / young people, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

9. Responsibilities of the STAFF in relation to safeguarding

- to read and understand, Part 1 of Keeping Children Safe in Education and **Annex A**, as well as **Annex B** if the lead or manage or work directly with children.
- to read and understand the Company's Safeguarding Policy and Procedures i.e. this document.
- to adhere to the Company's Staff Code of Conduct.
- to undertake regular safeguarding training.

- to be alert to the signs of abuse, and to report any concerns to the DSL immediately, and to know what to do if a child tells a member of staff, he/she is being abused, exploited, or neglected.
- to report to the Director of Dukes Plus Consultancy and the DSL if there are any concerns about the conduct of adults, including low level concerns.

10. The Dukes Plus Safeguarding Advisory Board

The board is in place to offer support and guidance to the Company. This support and guidance may take the form of support of live safeguarding issues or support the Director of Dukes Plus Consultancy/The DSL in monitoring the quality of practices and policy.

The Dukes Plus Safeguarding Advisory Board has appointed Mr Paul Ludlow from Dukes Education to act as Safeguarding Advisor.

The Dukes Plus Safeguarding Advisory Board consists of the following staff:

- Managing Director, Dukes Plus
- Director, Dukes Plus
- Dukes Plus Safeguarding Advisor
- Director of People, Dukes Education

11. What to do when there are concerns or if a child makes a disclosure

It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer any concerns about a child
- keep clear written records
- listen to the views of the child
- reassess concerns if the child's situation does not improve
- share information quickly and challenge inaction

Staff see children regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive.

It is more common with primary aged children for concerns to arise about a child through staff observations and casual conversation rather than a child making a direct disclosure. There may also be a change a child or young person's or art or written work which may show signs of confusion or distress.

Staff should be aware that younger child or young persons may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns.

Concerns may also be raised about a parent/carer's interaction with a child or young person or issues such as parental alcohol misuse, domestic abuse, or mental health. If there is any concern at all the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.

Appendix 1 of this policy give details of some of the types of abuse and safeguarding issues with which staff should be familiar.

12. Procedures if staff have a concern about a child or young person

If a member of staff is concerned about a child or young person the matter should be referred **immediately** to the DSL, or the Deputy in the DSL's absence.

Reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day (also see later section on recording concerns)

In all instances, a written record must be made by the member of staff.

- Do not promise confidentiality. Explain that you must make sure that the young person is safe, and you will need to ask other adults to help you to do this.
- Do not cross question the child or young person. You must not ask leading questions, that is, a question which suggests its own answer. Let the young person tell you what he or she wants to and no more. The young person may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- Be prepared to follow up with the young person, but only in conjunction with advice from the DSL.
- Be aware that younger children may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL.

If a concern or disclosure involves technology or online images staff must follow the specific advice in this policy.

13. DSL Action on receipt of a concern about a child

On receipt of the safeguarding report, the DSL must record the decisions made and action taken.

Action will depend on the nature of the concern. It may include one or more of the following:

- a) monitoring the child
- b) a discussion with parents **if this does not place the child at greater risk of harm after they have disclosed**
- c) early help intervention from the child's own school and/or another agency
- d) referral to Children's Services
- e) referral to the LADO
- f) report to the police

The member(s) of staff making the report will be informed by the DSL of the action taken.

If the child or young person's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

14. Preserving evidence

- a) All evidence (which could include a child or young person's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.
- b) If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- c) Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.
- d) If the imagery has already been viewed by accident (e.g. if a child or young person has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- e) Do not delete the imagery or ask the child or young person to delete it.
- f) Do not ask the child or young person(s) involved in the incident to disclose information regarding the imagery.
- g) Do not share information about the incident with other members of staff, the child or young person(s) it involves or their, or other, parents and/or carers.
- h) Do not say or do anything to blame or shame any child or young person(s) involved.
- i) Do explain that you need to report it and reassure them that they will receive support and help.
- j) Report the matter to the DSL immediately

15. Information sharing

Information will be shared according to the HM Government guidance Information Sharing (July 2018.)

The guidance states that practitioners should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a child or young person. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard child or young persons.

The guidance states that the information shared should be:

- a) Necessary and proportionate - Any information shared must be proportionate to the need and level of risk.
- b) Relevant - Only information that is relevant to the purposes should be shared with those who need it.
- c) Adequate - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- d) Accurate - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- e) Timely - Information should be shared in a timely fashion to reduce the risk of harm.
- f) Secure - Wherever possible, information should be shared in an appropriate, secure way.
- g) Record - Information sharing decisions should be recorded whether or not the decision is taken to share.

Practitioners may share information, without consent when there is a good reason to do so, and the sharing of that information will enhance the safeguarding of that child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent and if to gain consent would place a child at risk.

16. Referrals to Children's Services and/or other agencies

Referrals about an individual child or young person must be made to the borough in which the child or young person resides. However, advice may always be obtained from the Children's Services department of the school's local authority, regardless of the where the child or young person resides.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is **made immediately**. Referrals should follow the local referral process.

17. Staff Induction

The DSL is responsible for ensuring that all new members of staff, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to the new member of staff starting work with the children.

All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:

- Made aware of the Designated Safeguarding Lead and Deputy DSLs and their roles.
- Keeping Children Safe in Education, Part 1, and **Annex A** (and **Annex B** if they work directly with children).
- Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy/Handbook

18. Staff Training

- a) All staff are required to read, at least annually, the Safeguarding Policy (i.e. this policy) and the Staff Code of Conduct and must confirm that they have done so.
- b) All staff are required to read and understood the guidance for staff in Part 1 and **Annex A** of KCSIE and confirm that they have done so.
- c) Every member of staff receives training in safeguarding (including on-line safety)

19. DSL and DDSL (s) Training

The DSL and Deputy DSL undergo training at a minimum every two years, which includes training in inter-agency working in line with **Annex C** of KCSIE. They have updates, at least annually, on specific issues as required.

20. Acceptable Use of technology

- a) Staff must not take video footage or photographs of child or young persons except for company purposes.
- b) Any such images must not be placed in the public domain without the permission of the Directors.
- c) Company devices should be used wherever possible
- d) If a personal device is used, photographs or videos of child or young persons must not be stored or retained on personal cameras, mobile phones, or other devices. Any images must be uploaded to the internal server as soon as possible and permanently deleted from the personal device.
- e) Permitted images are stored securely on a password-protected section of the school intranet. They are deleted when no longer required.
- f) Cameras, mobile phones, or other photographic devices are not allowed in any areas where child or young persons may be washing or changing, nor should photography be used in a manner that may offend or cause upset.
- g) Parents / carers are asked to restrict photography whether on cameras, mobile phones, or other devices to major events that may be published.
- h) Parents / carers should be aware that other parents of young people attending the event or using the service may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and should not be shared on social media.
- i) Other visitors and contractors in are not permitted to take photographs in any area of the event without specific permission from the senior member of staff for the event.

21. Staff Code of Conduct

The Staff Code of Conduct gives comprehensive, clear guidance on the expected behaviour of **all adults**. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by child or young persons or others and report any conduct by an adult which raises concern. Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken.

Those staff who are involved in the provision of residential care, must ensure that they are not under the influence of *alcohol or drugs* when on duty. The DSL will ensure appropriate action is taken and inform the Directors immediately if there is a suspicion or staff have reported to them that they know someone to be under the influence of either substance. Any concerns by staff must be raised with the Directors or DSL.

22. Whistleblowing

It is recognised that child or young person cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, which may include the attitude or actions of colleagues. All members of staff have a duty to protect children and should they have concerns must make these concerns known to the DSL.

23. Allegations against staff

As part of its overall safeguarding ethos, the company ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the company (including self-employed staff, supply teachers, volunteers, and contractors).

All members of staff must follow the Staff Code of Conduct and always conduct themselves in a professional manner, both to ensure the safety of the child or young persons, and to reduce the risk of any allegation of improper behaviour.

Allegations that might indicate that a person is unsuitable to work with children are where a person 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 he or she 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.

The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors).

24. Procedures & Informing the Local Authority Designated Officer (LADO)

- a) If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a child or young person is in immediate danger, a referral to Children's Services and/or the police **MUST** be made immediately.
- b) An allegation of abuse by an adult will always result in a senior person from the Company (as detailed above) contacting the LADO of the Local Safeguarding Children's Partnership, who will advise on the next steps to be taken.
- c) Under no circumstances will Dukes Plus Consultancy conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken.
- d) Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.
- e) There are two aspects to consider when an allegation is made:
 - Look after the **welfare of the child** - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
 - Investigate and support the person subject to the allegation - the case manager (usually the Head of Safeguarding, unless the Head of Safeguarding is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- f) The companies aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.
- g) The DSL will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a child or young person has made an allegation, a written note of what the child or

young person has said will be made by the member of staff to whom the child or young person made the allegation.

- h) The DSL will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.
- i) Any allegation against employed staff, including those considered borderline, must be reported, and discussed with the LADO without delay, and **within one working day**.
- j) The Directors in consultation with the LADO and the DSL, will make the decision whether to suspend the teacher / member of staff involved.
- k) If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated.
- l) The company will take advice from the LADO, the Director, and other agencies to agree:
 - Who needs to know and exactly what information can/cannot be shared
 - How to manage speculation and gossip
 - What, if any, information can be given to the wider community to reduce speculation
 - If necessary, how to manage the press.
- m) Dukes Plus Consultancy has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.
- n) The following definitions will be used when determining the outcome 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.
 - False: there is sufficient evidence to disprove the allegation.
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- o) Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.
- p) Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

Both the DSL and the Director of Dukes Plus Consultancy will ensure that all staff should expect to support social workers and other agencies following any referral.

25. Allegations relating to contractors/employees of third party

Dukes Plus Consultancy procedures for managing allegations against staff above also apply to staff not directly employed by the company, for example, tutors or consultants employed on a contractor basis. Dukes Plus Consultancy will usually take the lead, but agencies/third party employers will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will Dukes Plus Consultancy decide to cease to use a contractor due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

26. Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If Dukes Plus Consultancy ceases to use the services of any person (whether employed or contracted) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

This will also include anyone who would have been dismissed if they had not resigned first.

For those contractors also employed elsewhere as teaching staff, the company also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in misconduct: the prohibition of teachers (October 2015). Further guidance is published on the TRA website - <https://teacherservices.education.gov.uk/>

27. Low-Level Concerns

- a) A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of Dukes Plus Consultancy may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- b) A member of staff may have doubts about the behaviour of another adult towards a young person, or another child, or concerns about how their own behaviour might be interpreted.
- c) Examples of such behaviour could include, but are not limited to:
 - being over friendly with young people.
 - having favourites
 - taking photographs of young people on their mobile phone/other device
 - engaging with a young person on a 1:1 basis in a secluded area or behind a closed door
 - using inappropriate sexualised, intimidating, or offensive language,
 - Email, messaging, use of social media sites or other communication between adults and young people outside agreed protocols
 - Any incident where he/she feels that his/her actions or behaviour towards a young person or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

- d) Staff must report any low-level concerns whatsoever to the Director and/or the DSL of Dukes Plus Consultancy.
- e) The Director of Dukes Plus Consultancy will be the ultimate decision maker in respect of all low-level concerns. The Director may wish to consult with the Dukes Plus Safeguarding Advisor or another member of the Safeguarding Advisory Board.
- f) Staff are also encouraged, and to feel confident if the need arises, for them to **self-refer**, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- g) When a low-level concern has been raised by a third party, the DSL or Director will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.
- h) Dukes Plus Consultancy will also consider if any wider issues within its company which has enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
- i) All low-level concerns will be recorded in writing. The record will include:
 - details of the concern.
 - the context in which it arose.
 - evidence collected by the DSL/Director where the concern has been raised via a third party.
 - the decision categorising the type of behaviour.
 - action taken.
 - the rationale for decisions and action taken.
 - the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
- j) Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- k) Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Director will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.
- l) The purpose of low-level reporting is to protect both young people and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- m) Low-level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
- n) A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the Whistleblowing Policy.
- o) If there is any doubt as to whether a low-level concern meets the harms threshold, then the DSL/Director will consult with the LADO.

28. Non-recent / Historical allegations

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

Where an adult makes an allegation to Dukes Plus Consultancy that they were abused as a child, the individual will be advised to report the allegation to the police.

Non-recent / historical allegations made by a child, will be reported to the LADO in line with the child's local Safeguarding Children's Partnership board procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

29. APPENDIX 1

Categories of abuse and Specific Safeguarding Issues

(i) Definitions of Abuse

The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked.

Any concerns, whether they are listed below or not, should be brought to the attention of the DSL immediately. The following signs are not conclusive evidence but may be a warning, particularly if a child or young person exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a child or young person showing such signs.

Categories of Abuse

The main categories of abuse outlined in KCSIE, are

- a) Physical abuse
- b) Emotional abuse (including domestic abuse)
- c) Sexual abuse
- d) Neglect

(ii) Risk factors

In an abusive relationship, the child may

- (a) appear frightened or wary of the parent/s or other adult
- (b) act in a way that is inappropriate to her/his age and development, although full account needs to be taken of different patterns of development and different ethnic groups.

The parent or carer may

- (c) persistently avoid child health promotion services and treatment of the child's episodic illnesses
- (d) have unrealistic expectations of the child
- (e) frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- (f) be absent or misusing substances
- (g) persistently refuse to allow access on home visits
- (h) be involved in domestic violence.

Staff should be alert to changes in a child or young person's behaviour if there is a new carer (e.g., nanny or au pair) in the child or young person's home.

(iii) Recognising signs of physical abuse

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.

The following are often regarded as indicators of concern:

- a. an explanation which is inconsistent with an injury
- b. several different explanations provided for an injury
- c. unexplained delay in seeking treatment
- d. the parents/carers are uninterested or undisturbed by an accident or injury
- e. parents are absent without good reason when their child is presented for treatment
- f. repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- g. family use of different doctors and A&E departments
- h. reluctance to give information or mention previous injuries
- i. two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- j. repeated or multiple bruising on the Head or on parts of the body unlikely to be injured accidentally
- k. variation in colour, possibly indicating injuries caused at different times
- l. the outline of an object used, e.g., marks from a belt or a hairbrush, or of a handprint
- m. bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- n. bruising around the face
- o. grasp marks on small children
- p. bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
- q. bite marks
- r. circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- s. scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
- t. scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath
- u. medical attention is sought after a period of delay when a fracture has caused symptoms such as swelling, pain or loss of movement.

(iv) Recognising signs of emotional abuse

Another form of abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child or young person that he or she is worthless or unloved, inadequate, or valued only insofar as meeting the needs of another person. It may include

not giving the child opportunities to express his or her views, deliberately silencing the child or 'making fun' of what he or she says or how the child communicates. It may feature age or developmentally inappropriate expectations being imposed on the children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, including domestic violence.

It may involve serious bullying (including cyberbullying), causing the child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

- a. developmental delay
- b. abnormal attachment between a child and parent/carer, e.g., excessive anxiety on the part of either
- c. indiscriminate attachment or failure to attach
- d. aggressive behaviour towards others
- e. scape-goated within the family
- f. frozen watchfulness, particularly in pre-school children
- g. low self-esteem and lack of confidence
- h. withdrawn or seen as a "loner" – difficulty relating to others
- i. reverting to younger behaviour
- j. depression, withdrawal
- k. fear of academic failure or 'getting things wrong'.

(v) Recognising signs of sexual abuse

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

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching the outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are

- (a) inappropriate sexualised conduct
- (b) sexually explicit behaviour, play or conversation, inappropriate to the child or young person's age
- (c) continual and inappropriate or excessive masturbation
- (d) self-harm (including eating disorders), self-mutilation and suicide attempts
- (e) involvement in prostitution or indiscriminate choice of sexual partners
- (f) an anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- (a) pain or itching of genital area
- (b) blood on underclothes
- (c) pregnancy in a younger girl where the identity of the father is not disclosed
- (d) physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation.

(vi) Signs of neglect

Neglect may be defined as 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.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to

- a) provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- b) protect a child from physical and emotional harm or danger
- c) ensure adequate supervision (including the use of inadequate caregivers)
- d) ensure access to appropriate medical care or treatment.
- e) be responsive to a child's basic emotional needs.

The following may be indicative of neglect of a child:

- a) the child is dirty, smelly, poorly clothed or appears underfed
- b) the child has lingering illnesses which are not attended to
- c) there is a marked deterioration in schoolwork
- d) the child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums
- e) an air of 'detachment' or a 'don't care' attitude
- f) overly compliant behaviour
- g) a child who is reluctant to go home or is kept away from school for no apparent reason
- h) 'Tummy pains' with no medical reason
- i) running away from home, suicide attempts

- j) extreme anger, sadness, or depression
- k) child left with adults who are intoxicated or violent
- l) child left alone for excessive periods
- m) child thrives away from home environment.

(vii) Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents.

Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing.

This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

(viii) Specific safeguarding issues

Further safeguarding issues of which staff should be aware are detailed below.

Extensive guidance on a wide variety of specific issues can be found in **Annex B of KCSIE** and in other guidance listed at the end of this policy.

- Child abduction and community safety incidents
- Children missing from education
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)domestic abuse
- Fabricated or induced illness
- Homelessness
- So-called 'honour based' abuse, female genital mutilation (FGM) and forced marriage
- Mental health
- Child-on-child abuse including Nudes/semi-nudes, youth produced sexual imagery
- Sexual violence and sexual harassment
- Up-skirting
- Online behaviour and cybercrime (Cybercrime is any criminal activity that involves a computer, networked device or a network. While most cybercrimes are carried out to generate profit for the cybercriminals, some cybercrimes are carried out against computers or devices directly to damage or disable them).
- Private fostering
- Preventing radicalisation (including Channel)

Guidance and practical support on specific safeguarding issues or concerns will be sought where necessary by the DSL.

(ix) Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child / young person into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- **Inappropriate relationships:**

Usually involves just one abuser who has inappropriate power –physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

- **Boyfriend:**

Abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

- **Organised exploitation and trafficking:**

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

(x) Child Criminal Exploitation (CCE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late,
- regularly missing school or education or not taking part in education,

- appearing with unexplained gifts or new possessions,
- associating with other young people involved in exploitation,
- having older boyfriends or girlfriends,
- suffering from sexually transmitted infections,
- mood swings or changes in emotional wellbeing,
- drug and alcohol misuse,
- displaying inappropriate sexualised behaviour.

(xi) Domestic abuse

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidences. The abuse can be but not limited to, psychological, physical, sexual, financial, and emotional.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (**teenage relationship abuse**). All of which can have a detrimental long-term impact on their health, well-being, development, and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

(xii) So called 'honour based' abuse (HBA)

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour.

Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

There is a statutory duty on teachers or educational professionals to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher or instructor / coach has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher / tutor is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where the staff member suspects that a child or young person is at risk (i.e. where the staff member does not discover that an act

of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a child or young person over 18, our staff should follow our company's head office local safeguarding procedures, as well as contact the DSL of the school / college that the child or young person is attending.

(xiii) Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A child or young person may have difficulty walking, sitting or standing and may even look uncomfortable. A child or young person may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating. There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the child or young person's return.

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

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHCE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

(xiv) Mandatory Reporting of FGM

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101.

The report should be made immediately.

The duty to report should not be transferred to the DSL, however the DSL **must be informed**. Where there is a risk to life or likelihood of serious immediate harm the staff member should report the case immediately to the police, including by dialling 999 if appropriate.

(xv) Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it.

A forced marriage is not the same as an arranged marriage which is common in many cultures. Forcing a person into a marriage is a crime in England and Wales.

(xvi) Child-on-child Abuse - sexual violence and sexual harassment

All staff working in our organisation have been advised to maintain an attitude of **“it could or is happening here”**.

Staff must report all concerns relating to sexual violence and / or sexual harassment both online and offline, including those which might be happening outside the Company while children or young person is one of our courses or services being provided. Our DSL will take charge of procedures following a report on sexual violence / sexual harassment

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers. .

A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

However, it should be made clear to any alleged victim that their information stated may have to be passed onto relevant people to help support them with their disclosure.

Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

(xvii) **Risk assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at Dukes Plus Consultancy especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded (paper or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all our children and young people and put adequate measures in place to protect and keep the child safe.

(xviii) **E-safety and online behaviour.**

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

- (a) content: being exposed to illegal, inappropriate, or harmful material
- (b) contact: being subjected to harmful online interaction with other users
- (c) conduct: personal online behaviour that increases the likelihood of, or causes, harm.

(d) commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams

The Company's Staff Code of Conduct explain the responsibilities of staff in relation to keeping young persons safe online.

Dukes Plus Consultancy does all it reasonably can to limit the child or young person's exposure to the above risks whilst accessing the organisation.

Cyber-bullying by child or young persons, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through the Company's Anti-Bullying policy and procedures.

Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. If staff suspect that a child or young person may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

(xix) Youth produced sexual imagery, nudes/semi-nudes, sexting, up-skirting

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Up-skirting is also a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Anyone of any gender can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material, they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images, or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

Parents / carers will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the child or young person at risk of harm.

If there is concern a child or young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

(xx) Preventing Radicalisation

As part of the Counter Terrorism and Security Act 2015, any educational business has a duty to 'prevent people being drawn into terrorism'. This is known as the '**Prevent Duty**'. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of Dukes Plus Consultancy's safeguarding approach. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. 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.

(xxi) Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages akin to those from illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes, and networks that young people can come across online so involvement with certain groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

(xxii) Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

30. APPENDIX 2

Logging a concern about a child's safety and welfare

Part 1 (for use by any staff)

Pupil's Name:	Date of Birth:
	Class:
Date and Time of Incident:	Date and Time (of writing):
Name (Print and Signature) and Job Title:	
Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?	
What is the pupil's account/perspective?	
Professional opinion where relevant.	
Any other relevant information (distinguish between fact and opinion). Previous concerns etc.	
What needs to happen? Note actions, including names of anyone to whom your information was passed and when.	

Check to make sure your report is clear to someone else reading it.

Please pass this form to your Designated Safeguarding Lead.

Part 2 (for use by DSL)

<p>Time and date information received, and from whom.</p>	
<p>Any advice sought – if required (date, time, name, role, organisation and advice given).</p>	
<p>Action taken (referral to children’s social care/monitoring advice given to appropriate staff/CAF etc.) with reasons.</p> <p>Note time, date, names, who information shared with and when etc.</p>	
<p>Parents informed? Y/N and reasons.</p>	
<p>Outcome</p> <p>Record names of individuals/agencies who have given information regarding outcome of any referral (if made).</p>	
<p>Where can additional information regarding child/incident be found (e.g. pupil file, serious incident book)?</p>	
<p>Should a concern/ confidential file be commenced if there is not already one? Why?</p>	
<p>Signed</p>	
<p>Printed Name</p>	



I have read and understood the Dukes Plus Consultancy Safeguarding Policy 2024.

Name _____

Signature _____

Date _____