

# Safeguarding Policy 2023

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# 1. Purpose of Policy

Complete Tuition Ltd fully recognises its responsibilities for safeguarding children. Students' welfare and safety are at the heart of everything we do. In this policy, a 'child' means all children and young people below 18 years of age.

In accordance with relevant law and guidance, as set out below in the second section, this policy details our procedures for safeguarding and child protection. Complete Tuition Ltd ensures that arrangements are in place to safeguard and promote the welfare of students by:

- Creating and maintaining an environment where all students feel secure, are encouraged to communicate, and are listened to.
- Providing effective, relevant and ongoing training and development for all employees to ensure best practice.
- Reviewing and supporting students who are subject to child protection plans and contributing to the implementation of the plan.
- Keeping meticulous, written records of concerns about students, (recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately.
- Ensuring the suitability of all employees and contractors through safe recruitment practice and maintaining an accurate and up to date Single Central Register.
- Making sure that all employees and contractors understand their responsibilities with regard to safeguarding and child protection.
- Maintaining awareness of those students who are persistently absent, notifying the local authority in line with 'Children Missing in Education' protocols.
- Maintaining clear procedure in line with the latest guidance for reporting allegations against staff members.

Furthermore, we recognises that:

- Some students are at increased risk of abuse.
- Some students face additional barriers with respect to recognising or disclosing abuse.

Complete Tuition is committed to recognising diversity and ensures anti-discriminatory practices. We ensure that all students have the same protection. We give special consideration to students who:

- Have special educational needs (SEN) or disabilities
- Are young carers.
- Show signs of mental health problems.
- Are missing education.
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Have English as an additional language.
- Are known to be living in difficult situations e.g. where there are issues at home, such as: substance abuse/misuse or domestic violence or where a family member has mental health needs.
- Are at risk due to either their own or a family member's mental health needs.
- Are within the care system and are looked after or have been previously looked after or have a social worker.

## 2. Safeguarding Children

### 2.1

Complete Tuition recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health and/or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care. ● Undertaking that role so as to enable children to have optimum life chances, so they can enter adulthood successfully

### 2.2

As part of meeting a child's needs,

- Recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect. 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 (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- Recognises that, to facilitate the sharing of 'special category personal data,' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Will identify children who may benefit from the Early Help process and make timely disclosures to the Local Authority to enable that process to begin. Working with safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments.
- Recognises that mental health issues can be an indicator of abuse and neglect and will share any such concerns appropriately.
- Will identify students who may be suffering from significant harm and make child protection referrals. ● Will identify students who need extra help and make appropriate referrals, including to early help service, to prevent concerns escalating.

### 2.3

Complete Tuition also understands the importance of contextual safeguarding, i.e. that incidents or behaviours can be associated with factors outside of our services. All staff should be considering the context within which such incidents and behaviours occur. This is known as contextual safeguarding and simply means that assessments should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## 3. Legislation and guidance

This policy is derived from a variety of legislative provisions and statutory guidance.

- Keeping Children Safe in Education (2022).
- Working Together to Safeguard Children (2018).
- Company Handbook

Our safeguarding policy and procedures comply with all of this guidance and are updated regularly.

The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.

Other statutory provisions relevant to child protection and safeguarding include:

- The Education Act 2002 (section 175/157).
- The Education (pupil information) (England) Regulations 2005.
- Prevent Duty Guidance for England and Wales – September 2015.
- The Sexual Offences Act, 2003, Home Office.
- Teaching online safety in schools, DfE, 2019.

### 3.1 Related Policies

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the policies and procedures referred to below:

- The employee data spreadsheet which checks ID, DBS and rights to work for each employee.
- The recruitment policy which outlines the process for recruiting tutors.
- Company handbook
- Data Protection Policy.
- The Health and Safety Policy.

## 4. Responsibilities

Complete Tuition recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

All employees and contractors are required to:

- Read and understand the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

- Attend all relevant training and development provided and be aware of all their responsibilities in line with Keeping Children Safe in Education 2022.
- Know how to deal with a disclosure. If a student discloses that they are being abused, there is a requirement to follow the guidance set out in Appendix 1.
- Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead.
- Understand the policy and procedure and know what to do in the event of an allegation made against someone working with children.
- Know the Designated Safeguarding Lead's name and contact details including telephone numbers and email.
- Be aware of the early help process. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

The Designated Safeguarding Lead is responsible for:

- Being available for all staff to discuss any safeguarding issues or concerns.
- Ensuring all staff are aware of the DSL contact details.
- Ensuring that all cases of suspected or actual problems associated with child protection or safeguarding concerns (including cases where the early help process may be appropriate) are referred to the appropriate agencies in line with procedures set out in this policy.
- Ensuring that appropriate training for staff (including periodic updates via email, or as part of staff meetings) is organised and renewed through ongoing professional development.
- Dealing with allegations of abuse, including assessments for early help, in accordance with local and statutory procedures.
- Ensuring that adequate reporting and recording systems are in place.
- Ensuring relevant records (and further information not contained in the child's child protection file) are passed on appropriately when students are being educated at alternative provision.
- Referring 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.
- Contributing and helping other staff to contribute to early help assessments.

## 5. Child Protection Procedures

### 5.1

Employees, contractors and tutors will follow the necessary child protection procedures if an incident occurs. They will be made aware that:

- Where a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately.
- Anyone can make a referral.
- They should not assume that somebody else will take action/share information that might be critical in keeping children safe.
- Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.

- The reporting of concerns relating to Female Genital Mutilation (FGM) is mandatory.
- The DSL will always be available to discuss safeguarding concerns.

When they suspect that any student may have been subject to abuse, or a student has suggested that abuse has taken place either to themselves or another student, the allegation must be reported immediately to the Designated Safeguarding Lead (DSL)

The DSL will:

- Deal with the allegation in accordance with the agreed procedures. In the case of a violent sexual assault or sexual harassment matter, the DSL will follow the latest procedures as set out in Keeping Children Safe in Education 2022.
- Be best placed to carry out a risk assessment of the issue and determine the escalation and timescales for dealing with the allegation.

It is best practice to ensure that all colleagues who are involved in the allegation are informed of the outcome, so there is closure or continual monitoring as necessary.

## **5.2 Allegations Made Against Employees/Contractors/Tutors**

All allegations of abuse in relation to a student must be brought to the attention of the Designated Safeguarding Lead immediately. In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children's social care services.

If the allegation against a teacher, tutor, employee or contractor meets any of the following criteria, the lead person must report it the same day:

- They have behaved in a way that has harmed a child, or may have harmed a child.
- They possibly committed a criminal offence against or related to a child.
- They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- They've behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.

## **5.3 Whistleblowing**

Where an individual feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

The NSPCC's "what you can do to report abuse" dedicated helpline is available as an alternative route for those who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled. In such instances they can call 0800 028 0285, which is available from 8:00am to 8:00pm, Monday to Friday, and email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **5.4 Training for staff**

Complete Tuition ensures all employees/tutors/contractors complete safeguarding and child protection training as part of their induction and is committed to updating training for all each year.

To achieve this:

- Time will be given to enable this commitment to be met.
- The Designated Safeguarding Lead (DSL) will receive relevant training every year.
- All new hires will be given appropriate safeguarding training as part of their induction
- All employees/tutors/contractors will undertake CPD

## **5.5 Suitability of staff and safe recruitment practices**

Complete Tuition recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that employees/tutors/contractors are suitable and therefore do not pose any kind of risk to our students.

- Provide proof of identity.
- Wear a name badge if they are delivering onsite tuition in schools.
- Receive suitable supervision by school staff when on site.
- Be made aware of the arrangements for safeguarding and health and safety.
- Comply with the relevant vetting checks
- At least 2 professional referees
- All relevant employees, contractors, subcontractors and tutors will have a valid up to date DBS check
- Have to demonstrate/evidence required qualification level.

## **6. Safeguarding students who are vulnerable**

All employees, contractors, sub contractors and tutors will be provided with an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) put children in danger.

### **6.1 Children Missing From Education**

All employees, contractors, sub contractors and tutors should be aware that children who go missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation, and can also be a sign of child criminal exploitation including involvement in county lines.

It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to prevent the risks of a child going missing in future.

### **6.2 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, in 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. All employees, contractors, sub contractors and tutors should be aware of the associated risks and understand the measures in place to manage these and will be made aware of the indicators that may signal children are at risk from, or are involved with, serious violent crime.

Signs may include:

- Increased absence.
- Change in friendships.
- New relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm.
- Significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

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 school or education.
- Not taking part in education.

If an individual 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.

### **6.3 'Honour' - based abuse (HBA)**

This encompasses incidents or crimes which have been committed to promote honour of the family or community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. FGM involves partial or total removal of the external female genitalia, and is a form of child abuse that must be reported directly to the police. HBA is a complex issue and can involve many perpetrators, so the actions taken to raise the alarm have to be considered carefully to protect the wellbeing of the child. Any concern of HBA, tutors should go to our safeguarding lead who will raise it directly with the schools safeguarding lead.

## 6.4 Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- a) in exchange for something the victim needs or wants, and/or
- b) for the financial advantage or increased status of the perpetrator or facilitator.

## 7. Procedure for students identified as being 'at risk' or vulnerable

Where risk factors are present but there is no evidence of a particular risk, the DSL will advise employees, contractors, sub contractors and tutors on preventative work that can be done to engage the student into mainstream activities and social groups.

In this situation, depending on the level of concern:

- The DSL can decide to notify the school directly.
- will review the situation after taking appropriate action to address the concerns.

### 7.1 Prevent, Extremism and Radicalisation

Identifying and preventing extremism is an important part of being a teacher or tutor. Children are vulnerable to extremist ideology and radicalisation. The following are some indicators and signs to be considered when tutoring children, not all will necessarily be relevant but it is important to understand the different types of indicators that children sometimes present:

#### Outward appearance

- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Becoming abusive to students who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts

- Sympathetic to extremist ideologies and groups

### **Online behaviour**

- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

If radicalisation is suspected then it must be reported to the DSL.

## **7.2 Child-on-child abuse**

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (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,<sup>9</sup> 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,<sup>10</sup> 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<sup>11</sup> (also known as sexting or youth produced sexual imagery)
- upskirting,<sup>12</sup> which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (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).

If any of these indicators are seen or suspected, it should be reported to the DSL

## **7.2 Mental Health**

All tutors should be aware of mental health issues as in some instances this is a sign of previous or ongoing abuse. You should not attempt to offer any intervention yourself but instead report it to the DSL so that they can arrange the appropriate response and ultimately ensure the child gets the support they need from a training professional.

## **8. Domestic Abuse**

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

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. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.

## **9. Online Safety**

Complete Tuition's Online, E-Safety Policy can be accessed upon request. All employees, contractors, sub contractors and tutors will be made aware of the contents.

The E-safety Policy must be read alongside this document and in conjunction with the DfE guidance: Teaching on-line safety in schools. Children must be safeguarded from potentially harmful and inappropriate online material.

## **10. Confidentiality and Record Keeping**

All employees, contractors, sub contractors and tutors have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL.

If a student confides in an individual and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that he/she has a responsibility to refer the matter to the DSL.

Accurate, signed, and dated written notes must be kept of all incidents or Child Protection concerns relating to individual students. If any employees, contractors, sub contractors and tutors have a child protection concern, they should inform the DSL as soon as possible. These will be kept on the student's Child Protection file.

Child Protection records must be retained securely. Arrangement for Child Protection documentations must comply with the Data Protection Policy together with data protection law and regulation applicable at the time. The DSL will ensure that all Child Protection records are held separately from other student records. Child Protection files and documents will be stored securely, by encryption and/or password protecting electronic files or ensuring that paper records are in a locked cabinet with restricted access. Information from child protection files will only be shared when it is necessary to do so and in a manner that is consistent with data protection law.

## **11. Equal Opportunities and Bullying**

Complete Tuition must take into account the Equality, Diversity, and Values Policy when discharging their duties under this policy. We do not tolerate prejudice, discrimination or bullying in any form. Our procedure is if you suspect bullying or discriminatory bullying, this should be reported to the DSL who will take the appropriate action. If cyber bullying occurs the same protocols apply.

In the unusual event that bullying appears to be actively taking place during a group lesson, the inappropriate behavior should be addressed immediately and depending on the severity of this the lesson should be stopped and the incident reported immediately. If there is a single occurrence of an inappropriate comment that may not constitute bullying that doesn't occur again, then the lesson should proceed and the incident reported. In all cases, if you are unsure, report the incident and take advice.

## **12. Monitoring, Reporting and Review**

Safeguarding processes are reviewed twice a week in two separate meetings, first with management and secondly with senior management. Any concerns are raised and discussed and corrective action taken where needed. Any incidents are captured on our safeguarding register. Risk assessments are carried out when undertaking new contracts for education providers or any instance where we are working directly with children or vulnerable adults.

All safeguarding incidents should be reported in the ways set out in this policy document. The Designated Safeguarding Lead (DSL) will monitor the working of this policy and will report as required to senior management. It will be reviewed annually.

# Appendix 1 - Staff Guidance

## A. Procedures in respect of Child Abuse

Child abuse exists where children have been physically or emotionally abused or severely neglected. Abuse of children is likely to be noticeable in a number of different ways. It is essential, therefore, that all those whose work brings them into contact with children and their families know the signs of child abuse and are aware of the procedures that they must follow to safeguard the child.

Keeping Children Safe in Education 2022 should be referred to for a list of those children who may be in need of safeguarding support.

Complete Tuition has the role of recognising and responding to potential indicators of abuse and neglect. All other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential.

In the event of an actual or suspected case of child abuse by adults, parents, teachers, or any other adult, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as soon as possible. The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified and the appropriate agency is involved.

## B. Guidance for all staff on dealing with disclosure / suspected abuse / neglect / sexual harassment, sexual assault, violence, honour based abuse (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and peer-on-peer abuse

### I. Dealing with disclosures of abuse

- Always listen carefully and quietly. Do not press for any evidence at all.
- Remain calm and reassuring. Do not dismiss the disclosure and do not show distress or concern.
- Do not refute the allegation.
- Show that you care through open and reassuring facial expressions and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- Ensure you take a written verbatim account of the child's disclosure.
- Staff should be aware that written accounts could become part of a statutory assessment or criminal investigation.
- Where there is an online element, the key consideration is for staff not to view or forward illegal images of a child. Where viewing images is unavoidable, the following link provides advice on how to respond: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759007/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759007/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

### II. At this point, staff should take the following steps:

- Explain to the student that the disclosure must be reported – emphasise your trust in them.

- Do not promise to keep the allegation secret or that ‘everything will be alright.’
- Reassure the student by telling them that they have done the right thing in telling you. Do not offer physical reassurance.
- Do not admonish in any way e.g. ‘I wish you had told me sooner.’
- Inform the DSL initially verbally.
- Under no circumstances discuss the matter with any other person. If the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a ‘need to know’ basis at the discretion of the DSL. ● If the child agrees, and it is appropriate, take them with you to the DSL.
- With the DSL, prepare a detailed report itemising:
  - The information revealed by the student. It should not contain any opinion whatsoever.
  - Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken
  - Date and sign any written record of events and action taken and keep confidential and secure.
- You must keep, in absolute confidence, a copy of the report, as will the DSL.
- The DSL keeps Child Protection records centrally and securely and are not kept in the child’s file.
- All staff are under a duty to report all suspicions of abuse to the DSL.
- The DSL is responsible for passing on these concerns to Children’s Services.
- Accurate records are essential in the event of further investigations.

III. If you see or hear something that is concerning:

- Don’t ignore it or assume that it is someone else’s responsibility to report it.
- Upload all information to our safeguarding systems and seek advice immediately from your DSL.
- Don’t feel silly – if it worries you, someone else needs to know.
- If it is related to a child being at risk, see the DSL
- All staff may raise concerns directly with Children’s Services if they feel an incident is not being dealt with appropriately or they are unable to locate relevant staff.

Child Protection Procedures – Points of action

1. If anyone discovers or suspects child abuse/peer on peer sexual violence or sexual harassment, they must inform the DSL. The DSL will, in the appropriate manner and according to procedures, assess the situation.

2. The DSL will, if appropriate, take the following steps:

- Where there is a report of peer on peer sexual violence, the DSL will make an immediate risk and needs assessment in accordance with part five of Keeping Children Safe in Education 2022
- Where it is clear that a Child Protection Referral (significant harm) is needed, they will contact Social Services without delay.
- Where the DSL is not sure whether it is a Child Protection issue, or where the DSL needs to check the Child Protection register, they may seek advice from the MASH (Multi Agency Safeguarding Board).