



# SAFEGUARDING AND CHILD PROTECTION POLICY

The ELKOLET Centre, Mill Lane, Alton, GU34 1BD

T: 01420 86980 W: [www.elkolet.com](http://www.elkolet.com)

E: [info@elkolet.com](mailto:info@elkolet.com)

Reviewer	Paula Knowles
Review Date	September 2024
Next Review Date	September 2025

## Contents

1. Key Contacts.....	3
2. Purpose of Policy.....	3
3. Legislation and Guidance.....	5
4. Safeguarding Children.....	6
5. Abuse and Neglect.....	7
Physical abuse.....	7
Emotional abuse.....	8
Sexual Abuse.....	8
Neglect.....	8
6. Prevent Duty.....	8
ELKOLET’s Duty.....	9
Reducing risks of extremism.....	9
Potential signs of radicalisation and extremism.....	10
7. Specific Safeguarding Concerns.....	10
Warning signs of exploitation.....	10
Child criminal exploitation.....	10
Serious violent crime.....	11
Child sexual exploitation (CSE).....	12
Honour-based abuse: Forced Marriage (FM).....	13
Honour-based abuse: Female Genital Mutilation (FGM).....	13
Peer-on-peer abuse.....	14
Sharing nude/semi-nude images (sexting).....	16
8. Domestic Abuse.....	17
9. Children Missing from Education.....	18
10. Online Safety.....	18
Filtering and Monitoring.....	19
11. Cybercrime.....	21
12. Homelessness.....	21
13. Looked After Children.....	21
14. Pupils with Special Educational Needs, Disabilities, or Health Issues.....	22
15. Opportunities to Teach Safeguarding.....	22
16. Safeguarding and Child Protection Procedures.....	23
17. Suitability of Staff and Safer Recruitment Practices.....	25
18. Training.....	25
19. Allegations against members of staff.....	25

Allegations which meet the harms threshold .....	26
Allegations which do not meet the harm threshold.....	26
20. Whistleblowing.....	27
21. Confidentiality and record-keeping.....	27
22. Working with parents/individuals with parental responsibility.....	28
23. Equal opportunities .....	28
24. Health and safety.....	28
25. Monitoring and review of this policy.....	29
Appendix 1- Law and Guidance.....	30

## 1. Key Contacts

Designated Safeguarding Lead- Paula Knowles

Nominated Trustee for Safeguarding – Bryan Knowles

Local Authority Safeguarding Contact is through the Commissioning School/Agency

If you are concerned about extremism in school, or if you think a child might be at risk of extremism, contact the helpline on 020 7340 7264 or email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

The procedures of the Hampshire Safeguarding Children Partnership can be accessed at <http://hipsprocedures.org.uk/page/contents>

Any links to local or national advice and guidance can be accessed via the safeguarding in education webpages: [www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance](http://www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance)

## 2. Purpose of Policy

ELKOLET Charity fully recognises its responsibilities for safeguarding children. Our students' welfare and safety are at the heart of our charity's ethos and in everything we do. The main arm of the charity which directly relates to students and children on site is our Alternative Provision, The King's Way, herein after referred to as AP or TKW.

In accordance with relevant law and guidance this policy details our procedures for safeguarding and child protection. It is applicable to the whole of the ELKOLET community.

Safeguarding is defined in the Working together to safeguard children Statutory Guidance (based on the Children Act 2004) as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Definitions within this policy:

"Child" means all children and young people below 18 years of age. This policy encapsulates all students with TKW and extends to visiting children and students from other establishments.

The term "Staff" applies to all those working for or on behalf of ELKOLET Charity and Group of companies, full time or part time, in either a paid or voluntary capacity. This also includes Trustees.

"Parent" refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, step-parents and foster carers.

The term "Commissioner" refers to the school or agency who refers an individual to TKW.

We will work together with our three safeguarding partners (Commissioning Schools, Commissioning Agencies and Chief of Police for our LA area) to safeguard and promote the welfare of local children, including identifying and responding to their needs.

These are the foundations on which all of ELKOLET's safeguarding, child protection, and welfare systems are built:

- Ensuring that all staff and volunteers understand their responsibilities with regards to safeguarding and child protection.
- Ensuring that all staff are trained to understand the risk factors for all child protection, safeguarding and welfare concerns and know the indicators of abuse, neglect, and exploitation, and know the appropriate reporting mechanism.
- Creating and maintaining an environment where all children feel secure, are encouraged to communicate, and are listened to.
- Ensuring a zero-tolerance attitude towards any form of peer-on-peer harassment or sexual violence, and appropriate responses to issues we encounter
- Ensuring all staff understand that, even when it isn't formally reported, harassment and sexual violence is happening.
- Ensure all staff understand their roles and responsibilities in relation to filtering and monitoring
- Teaching students to keep themselves safe, including online, from all forms of abuse, bullying, harassment, or exploitation.
- Swiftly and effectively addressing any child protection or safeguarding concerns, ensuring the Commissioner is informed and any referrals are made in a timely manner in line with safeguarding protocols.
- Ensuring effective links with relevant agencies in all matters regarding safeguarding and child protection
- Supporting students who are subject to child protection plans and contributing to the implementation of the plan alongside the Commissioner
- Keeping meticulous, written records of concerns about students, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately.
- Ensuring the suitability of all staff through safe recruitment practice and maintaining an accurate and up-to-date Single Central Record.
- Maintaining clear procedures in line with the latest guidance for reporting allegations against staff members.
- Ensuring that parents and carers also have an understanding of the responsibility placed on the school and its staff for safeguarding and child protection.
- Maintaining awareness of those students who are persistently absent or missing from school, notifying the Commissioning School so they are able to notify the Local Authority in line with 'Children Missing in Education' protocols as this can be a sign of a range of safeguarding concerns.

Furthermore, ELKOLET recognises that some students are at increased risk of abuse, and some students face additional barriers with respect to recognising or disclosing abuse.

The school 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 (further information is in Section 14).
- Are young carers (further information is in Section X).
- Show signs of mental health problems (further information is in Section X).

- Are missing education (further information is in Section 9).
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation (further information is in Section 6 and 7).
- 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, domestic abuse, or where a family member is in prison or 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 (further information is in Section 13).
- Have a parent/carer who has expressed an intention to remove them from school to be home- educated.

### 3. Legislation and Guidance

This policy for ELKOLET is derived from a variety of legislative provisions and statutory guidance. In particular, it is based on good practice found in:

- Keeping Children Safe in Education (2024).
- Working Together to Safeguard Children (2018).
- Alternative Provision Statutory Guidance (2013).

The following legislation and statutory guidance 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.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory Guidance on FGM.
- 'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.
- Schools' "PREVENT" duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory Guidance on the Prevent Duty.
- The Education Act 2002 (Section 175).
- The School Staffing (England) Regulations 2009 Schedule 2, which covers information which must be entered into the Single Central Register, and Section 9, which stipulates that at least one person per interview panel must be trained in safer recruitment.
- Teaching Online Safety in Schools, 2019, DfE.
- Guidance on Sharing Information.
- Teaching Standards.

- Criminal Exploitation of children and vulnerable adults: County Lines guidance

ELKOLET has also read and incorporated Ofsted's review of sexual abuse in schools and colleges published in June 2021 into this and connected policies and procedures.

A full list of the guidance this policy has referred to, and which staff can refer to for further information, can be found in Appendix 1: 'Guidance Documents'.

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 ELKOLET's policies and procedures referred to below:

- Guidelines for Visitors
- Bring Your Own Device Policy
- Staff Code of Conduct
- Data Protection Policy
- Attendance Policy
- Online, Email, Mobile Phones and Social Media Safety Policy.
- Behaviour Policy
- Equality, Inclusion and Diversity policy
- Relationships and Sex Education Policy
- Health and Safety Policy.
- Fire Safety Policy
- Off-Site Visits Policy
- Whistleblowing policy

## 4. Safeguarding Children

ELKOLET recognises that safeguarding covers a broad range of areas and it aims to achieve all points identified Section 2: Purpose of this Policy.

The responsibility of ensuring the safeguarding and protection of students lies with two parties: the provider- TKW, and the commissioner- any referring school or agency. The statutory guidance for Alternative Provisions (2013), paragraph 38, identifies that a good alternative provision must be "good quality, registered where appropriate, and delivered by high quality staff with suitable training, experience and safeguarding checks". The guidance also states in paragraph 37 that "prior to placement, commissioners should still assess whether the provision offers high quality education and is suitable for the pupil's individual needs".

ELKOLET's policy reflects these duties and complies with our Service Level Agreement with Commissioning Schools/Agencies.

As part of meeting a child's needs, ELKOLET:

- 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.
- Knows that 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. The school recognises the government's seven golden rules of information sharing, as outlined in the statutory guidance Information Sharing, 2018. Where any doubt exists, staff will seek support from the DSL.
- Recognises the importance of confidentiality in all data ELKOLET holds and in particular in relation to safeguarding and child protection records.
- Will identify children who may benefit from the Early Help process and make timely disclosures to the Commissioner to enable that process to begin
- 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 alongside the Commissioner
- Will identify students who need extra help and make this known (if not already known) to the Commissioner, so they may make appropriate referrals

ELKOLET also understands that incidents or behaviours can be associated with factors outside home or school and can occur between children outside of school. All staff should be considering wider environmental factors that are present in a child's life which are a threat to their safety and/or welfare.

## 5. Abuse and Neglect

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children. In many cases, multiple issues of abuse will overlap.

ELKOLET is aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. All staff should report any concerns to the DSL who will discuss these with the Commissioner and an informed decision will be made on how to move forward regarding the concern.

Through training, all staff will be aware of the indicators of abuse and what to do if they have a concern about a child. Early identification of abuse and/or neglect is extremely important in helping and protecting a child and any others involved.

### Physical abuse

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



## Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate.

It may also feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may also involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

## Sexual Abuse

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

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

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by men, women, or other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) and set out separately in this policy.

## Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy - for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

Provide adequate food, clothing, and shelter (including exclusion from home or abandonment), or protect a child from physical and emotional harm or danger.

Ensure adequate supervision (including the use of inadequate caregivers).

Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## 6. Prevent Duty

## ELKOLET's Duty

ELKOLET deals with children and young people who are susceptible and at risk of radicalisation. The charity follows the Prevent Duty Statutory Guidance, 2015, which details a school's responsibility in the Counter-Terrorism and Security Act, 2015. ELKOLET are aware of the attempt at both a local and national level where extremist groups have attempted to radicalise vulnerable young people to hold extreme views.

The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism.

The following key principles underpin ELKOLET charity and are created from the fundamental British Values:

- Respect.
- Tolerance.
- Freedom of speech.
- Expression beliefs and ideology.
- Democracy

Freedom of expression is a right for every individual and allows them the freedom to hold opinions and receive and impart information and ideas. However, this freedom carries responsibilities and may therefore be subject to conditions and formalities in the interest of national security, public safety, prevention of disorder and crime and for the protection of health and morals.

The Prevent Duty statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are suitable, appropriately supervised, and undergo the same checks as other visitors.

ELKOLET is committed to training all staff in connection with the issues arising from our Prevent Duty. We are also committed to working local agencies and commissioning schools/agencies to assess the potential risk of individuals being drawn into terrorism, as communities and families play a key role in ensuring young people are safe from the threat of terrorism.

The DSL will keep up-to-date with local threats, policies, and procedures relating to Prevent.

## Reducing risks of extremism

The DSL will work with local agencies and the Local Authority's risk assessment to determine the potential risk of individuals being drawn into terrorism.

Actions to reduce these risks will include:

- Promoting spiritual, moral, social, and cultural development for students and within this fundamental British values.
- Providing a safe environment for students to discuss controversial and sensitive topics and how they can participate in decision making.
- Ensuring there are appropriate filters for online use in TKW as to protect students from accessing extremist content.

As with any other safeguarding risk, staff must take action when they observe behaviour of concern by reporting it to the DSL

## Potential signs of radicalisation and extremism

There is no single way of identifying an individual who is likely to be susceptible to a terrorist/radical ideology. Staff should be vigilant with identifying changes in behaviour which may indicate a need for help or protection.

There is no finite list of signs for radicalisation, though some indicators may be:

- Becoming increasingly argumentative and angry
- Refusing to listen to different points of view.
- Being unwilling to engage with or being abusive towards children who are different.
- Embracing conspiracy theories.
- Changing friends and appearance.
- Converting to a new religion.
- Being secretive and reluctant to discuss their whereabouts.
- Being sympathetic to extremist ideologies and groups.
- Speaking as if from a script
- Becoming increasingly secretive with what they are accessing online

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism. Most children and young people do not become victims of radicalisation. For that reason, all indicators and changes in behaviour should be dealt with on a sensitive case-by-case basis to address the root issue affecting the young person; this may be mental health, a form of abuse or drug/alcohol misuse. All staff should raise their concerns with the DSL.

## 7. Specific Safeguarding Concerns

All staff at ELKOLET are aware of safeguarding issues that can put children at increased risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, being absent as well as missing in education, and sharing nudes or semi-nudes (also known as sexting) can put children at an increased risk of danger.

### Warning signs of exploitation

One of the main signs of abuse or exploitation is when a child is persistently absent or goes missing from education. This can be a vital warning sign of a range of safeguarding concerns, but in particular, exploitation - including criminal exploitation and county lines and/or sexual exploitation. All staff should be aware of Children Missing Education procedures, which are set out in Section 9.

### 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. Children can be moved from area to area – this is known as trafficking. Involvement in this type of abuse can be as a direct result of threats of serious violence to the young person or their family.

The victim can be exploited even when the activity appears to be consensual. Further, it does not always involve physical contact but can happen exclusively online.

Examples of CCE include: young people being forced to work in cannabis factories, coerced into moving drugs, money, or weapons including across the country (county lines), forced to shoplift, pickpocket, or steal vehicles, or forced into violent crime or making threats to other young people.

Indicators of CCE and being exploited through county lines can include a child:

- Persistently going missing from school or home and/or being found out-of-area.
- Appearing with unexplained gifts, new possessions, or money.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Not taking part in education.
- Being involved in serious violence, carrying weapons, or vehicle crime.
- Gang association or isolation from peers or social networks.
- Excessive receipt of texts/calls and/or having multiple mobile phones

### Serious violent crime

Some students may be drawn into serious violent crime. Staff need to be aware of the indicators that this may be happening to a student. These may include:

- Increased absence from school.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs, and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as:

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

As with any other safeguarding concern, staff should speak immediately to the DSL so the correct procedures can take place alongside the Commissioner; this could be through the Early Help process or even the police.

## Child sexual exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse (see section 5 for supplementary information). It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator, and/or
- by threats of serious violence to the victims and their family.

It can be a one-off or part of a series of acts over time, and can happen without the child's immediate knowledge (e.g. through other sharing images of them). It can be perpetrated by men or women, and peers can be involved. Victims of this type of abuse can be male or female. The victim may be subject to criminal exploitation and may be trafficked for the purpose of exploitation.

The victim may have been sexually exploited even if the activity appears consensual. Children or young people can be coerced and sometimes do not know they are being abused, for example, they believe they're in a genuine romantic relationship and they trust their abuser.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity.
- Inappropriate or risky sexual or sexualised behaviour.
- Repeated sexually transmitted infections.
- In girls, repeated pregnancy, abortions, and miscarriage.
- Receiving unexplained or unaffordable gifts or gifts from unknown sources.
- Going to hotels or other unusual locations to meet friends.
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends, or hanging out with groups of older people.
- Being involved in abusive relationships, intimidated, and fearful of certain people or situations.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with school, opting out of education altogether.
- Unexplained changes in appearance, behaviour, or personality (chaotic, aggressive, sexual, etc.).
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Being involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

## Honour-based abuse: Forced Marriage (FM)

This is an entirely separate issue from an arranged marriage. Forced Marriage is a criminal offence in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Young men and women can be at risk in affected ethnic groups. The Forced Marriage Unit's statistics for 2022 show that 29% of all cases involved victims below the age 17. Their evidence also shows that the risk of forced marriage is linked to focus countries such as Pakistan, India, the UK and Bangladesh. Forced Marriage can also affect victims with mental capacity concerns, accounting for 19% of cases.

Signals of FM in education include but are not limited to:

- Lengthy and/or persistent absence from school
- Fear about forthcoming school holidays
- Surveillance by siblings or cousins at school
- Decline in behaviour, engagement, and performance
- Sudden announcement of engagement to a stranger
- Prevented from going to further/higher education

Any member of staff at ELKOLET with any concerns should report this immediately to the DSL, who will raise the concern with the Commissioner. Together, the two parties should raise the concern with the Local Police Safeguarding Unit.

TKW will never attempt to intervene directly as this can pose a risk to the child. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

## Honour-based abuse: Female Genital Mutilation (FGM)

There is a specific legal duty from Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed upon teachers regarding FGM. If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff at ELKOLET will recognise this responsibility.

What is FGM?

Female genital mutilation involves partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.

Why is it carried out?

FGM is often based on a belief that the process:

- Brings status/respect to the girl – social acceptance for marriage.

- Is part of being a woman/rite of passage.
- Upholds family honour.
- Fulfils a religious requirement.
- Helps girls be clean/hygienic.
- Is cosmetically desirable.
- Makes childbirth easier – this is a mistaken belief.

FGM is a criminal offence.

All staff at ELKOLET will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM. Circumstances and occurrences that may point to FGM happening include:

- The child talking about getting ready for a special ceremony.
- The child and their family taking a long trip abroad.
- The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia, and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- The child talking about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities.
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infections.
- Disclosure of abuse.

### Peer-on-peer abuse

All staff at ELKOLET must be aware that children can abuse other children (referred to as peer-on-peer abuse). This is most likely to include, but is not limited to:

- Bullying, including cyberbullying, prejudiced-based, and discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse, such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment and online sexual harassment, such as that which takes place on social media or chat rooms, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which is a form of abuse that has been high on school and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Upskirting occurs when someone takes a picture under a person's clothing, with or without underwear, without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. It is a common aspect of peer-on-peer abuse and can happen to any gender.
- 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. It may also include an online element.

Every student will react differently, but some recognised indicators of peer-on-peer abuse are:

- Bleeding, bruising, sexually transmitted infections (STIs), or pregnancy.
- Becoming withdrawn or displaying other behaviour changes.
- Being fearful of being in school or online.
- Missing education.
- Self-harming.
- Displaying behaviours beyond their stage of development.

Most issues of peer-on-peer abuse can be dealt with through the school's behaviour policy, but where the behaviour raises a safeguarding concern, it falls within the scope of this Safeguarding and Child Protection Policy. Procedures for dealing with these sorts of concerns, including violent sexual assault by peers, is set out in section 16 of this policy.

TKW recognises that it is important to educate students to understand (see section 15 for more information):

- What constitutes appropriate behaviour – including online.
- Issues around consent.
- Issues around discrimination and misogamy.
- Where the criminal law fits into this type of behaviour.

ELKOLET recognises that though there may be no issues reported directly to staff, that does not mean these actions are not going on. Consequently, the procedures and expectations outlined in section 16 are based on the following:

- This type of abuse takes place in school, outside of school, and online and can affect any age of child.
- Staff must maintain an attitude of "it could happen here".
- Downplaying inappropriate behaviour can lead to a culture of unacceptable behaviour and can lead ultimately to normalisation of abuse. It will not be tolerated – we have a zero-tolerance approach to this issue.
- Staff must intervene in "inappropriate" behaviour, which can prevent it from escalating to abusive or violent behaviour.
- It is crucial to have a zero-tolerance approach to sexual violence and sexual harassment, and an important part in this is not tolerating or laughing off sexual banter or jokes.
- The abuse can be perpetrated by an individual or a group.
- Sexual violence can happen in intimate relationships between peers.



- There can be links between this type of abuse and sexual and criminal exploitation.
- Some children may face additional barriers in reporting because of vulnerabilities, disabilities, sex, ethnicity, and sexual orientation.
- Procedures that we put in place to deal with issues of sexual violence or harassment must be clear, easily accessible, and well-promoted, so that children feel confident in reporting abuse.
- Staff must be aware of behaviour in children that might indicate there is an issue with sexual harassment or violence and act immediately.
- Responding to each incident well will build a trust in the systems so that victims will feel able to come forward in future.
- It is extremely important to listen and react to the child's report (listening well and not asking leading questions).
- Whilst victims' wishes and feelings are of paramount importance, a school should not forget to balance this with its duty to protect other children.
- Where a report is found to be malicious or unfounded, TKW and the Commissioner would consider what the most appropriate step should be – it might be that the person has been abused by someone else or the allegation might be a cry for help. If the report was deliberately made up, TKW and the Commissioner will consider using disciplinary processes.
- It is important to look for patterns in all reports and identify any broader issues that need to be addressed.

### Sharing nude/semi-nude images (sexting)

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

If you are made aware of an incident involving the sharing of nude or semi-nude images, you must report it to the DSL immediately.

You must not:

- View, download, copy, print, or share the imagery yourself, or ask a pupil to share or download it. This is illegal. If you have already viewed the imagery by accident, you must report this to the DSL and seek support.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves, or their, or other, parents and/or carers.
- Say or do anything to blame or shame any student involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Further information can be found here:

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

Students should be made aware of this information so that they are aware of the processes ELKOLET will follow in the event of an incident.

## 8. Domestic Abuse

Domestic abuse (also referred to as domestic violence) refers 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. It can occur in intimate relationships between older children.

Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children. Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.

Indicators that a child is living within a relationship with domestic abuse include but are not limited to:

- withdrawn
- suddenly behaves differently
- anxious
- clingy
- depressed
- aggressive
- problems sleeping
- eating disorders
- wets the bed
- soils clothes
- takes risks
- misses school
- changes in eating habits
- obsessive behaviour
- nightmares
- drugs
- alcohol
- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse, but should be considered as indicators that this may be the case.

If staff believe that a child is living with domestic abuse, this will be reported to the DSL who will report it the Commissioner to be considered for referral to Children's Social Care.

## 9. Children Missing from Education

All children, regardless of their circumstances or background, are entitled to full-time education that is suitable to their age, ability, aptitude, and any special educational needs and disabilities. Not every student can access full-time education whilst in mainstream education, hence why The King's Way was started.

TKW operates a strong attendance tracking system. The Commissioner retains the responsibility to contact TKW daily to check the attendance of their students. This tracking enables TKW and the Commissioner to ensure that every child is accounted for.

TKW will follow up on absences of students when they are meant to be with the provision and inform the Commissioner of information obtained and any actions taken.

TKW takes a range of actions to tackle Persistent Absentees alongside the Commissioner including;

- Regular review meetings
- Constant, consistent communication with the parent/guardian
- Option for online learning
- A bespoke timetable

TKW will not authorise a leave of absence without the relevant discussions and approval from the Commissioner. This will only be in exceptional circumstances.

Please see our Attendance Policy for more detailed information and procedures.

## 10. Online Safety

ELKOLET's Bring Your Own Device Policy, Online, Email and Social Media Safety Policy and other connected policies and agreements can be found at [www.elkolet.com/policy-center](http://www.elkolet.com/policy-center) or are available upon request. These are reviewed and updated annually.

The everchanging and evolving threats that the internet and technology poses are to be understood by staff and are covered in the annual safeguarding training.

TKW's approach to online safety is based on the four key categories of risk as identified by KCSIE 2024:

- Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes.
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g. consensual and non-consensual

sharing of nudes and semi-nudes and/or pornography), sharing other explicit images, and online bullying.

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

Being safe in the online environment is essential for students. Today most of their lives revolve around their devices and with data, it is near impossible to escape technology penetrating all parts of their lives. As a result, TKW ensures that online safety is taught throughout the curriculum and a safe space for all students is created to ensure they know they can talk to all staff regarding any issues or concerns they have online.

Topics include:

- Recognising threats.
- Recognising inappropriate content
- How to keep personal data safe
- How to report issues of concern

ELKOLET ensures that all online devices that are provided to students have the appropriate level of security to protect the user's data and that filters and monitoring systems are in place to reduce students' exposure to risks.

## Filtering and Monitoring

ELKOLET is committed to ensuring the safety and well-being of all its students, staff and volunteers. In pursuit of this commitment, the procedures and tools outlined below are employed to maintain a secure online environment within our premises, network, and devices. These measures are implemented to protect students from accessing harmful or inappropriate content, prevent cyberbullying, and maintain a secure digital learning environment. For more information and in-depth policies and procedures please see our Online, Email and Social Media Policy.

### Internet Filtering-

ELKOLET employs an internet content filtering system to restrict access to inappropriate, harmful, or malicious websites and content. This system is continuously updated to adapt to evolving online threats. The system is provided by BT Business.

The content filtering system operates at both the ELKOLET network level and on individual devices issued by us. It is configured to block access to websites, web applications, and online platforms that are not deemed suitable for educational purposes.

Requests for unblocking specific websites for educational purposes should be directed to the designated IT administrator, who will review and, if appropriate, unblock the requested content.

### Email Filtering-

ELKOLET utilises Microsoft 365 for Education. This service's email system incorporates filtering mechanisms to minimize the risk of phishing attacks, spam, and malicious email content.

Students and staff are encouraged to report any suspicious emails to the IT department for investigation and potential action.

### Network Monitoring-

ELKOLET's network is continuously monitored for unusual or suspicious activity that may pose a threat to the security and well-being of students and staff.

Network logs are regularly reviewed by the appointed IT person to detect any unauthorised access or breaches of security.

Any unusual or suspicious activity discovered during network monitoring will be promptly brought to the attention of the DSL, subsequently investigated, and appropriate action will be taken, which may include reporting the incident to the relevant authorities.

### Device Monitoring-

All ELKOLET-issued devices, including laptops and tablets, are subject to monitoring to ensure they are used for educational purposes and in accordance with ELKOLET's policies.

Monitoring of devices may include tracking software, which helps in locating lost or stolen devices.

Monitoring is not intended to infringe upon individuals' privacy but to ensure a safe and secure learning environment.

No application downloads on ELKOLET devices are allowed in configuration to ensure no malicious or inappropriate applications are being used by students. Should this be required, the request to the IT persons and DSL shall be submitted and an administrator account can see to the necessary changes.

Within the monitoring process, all devices are regularly check by the appointed IT persons to ensure all applications and operating systems and software is up-to-date to reduce the vulnerability of applications and devices. All software and applications are enabled for automatic updates to reduce the likelihood of a missed update due to human error.

### Digital Communication Monitoring-

ELKOLET may monitor digital communications conducted on ELKOLET-owned platforms, such as email and messaging systems, to ensure compliance with our policies and to prevent cyberbullying, harassment, grooming or other inappropriate conduct.

Monitoring of digital communication will be conducted discreetly and with respect for privacy, only as necessary to address specific concerns or incidents.

### Training

All ELKOLET staff undergo annual training in the basics of cyber security as the most common forms of cyber-attacks rely on human error. The best way to minimise the risks of a cyber-attack or inappropriate usage is training staff member on the best practices, key signs, and reporting processes in the case of threats, attacks, or inappropriate usage.

### Reporting and Accountability

Students and staff are encouraged to report any concerns regarding ELKOLET's filtering and monitoring practices to the DSL or appointed IT persons.

Reports will be treated confidentially, and appropriate action will be taken in response to concerns or incidents as outlined in our Online, Email and Social Media Policy.

ELKOLET will regularly review and update its filtering and monitoring practices to ensure they remain effective and in compliance with applicable laws and regulations. By using the Filtering and Monitoring Review Checklist, ELKOLET can ensure we are meeting the required standards of cyber security and filtering and monitoring.

## 11. Cybercrime

ELKOLET recognises that with constant access to technology, students are at risk of being drawn into this type of cyber-enabled criminal activity; especially those with a particular aptitude, skill or interest in computing and technologies. There are three main types of activity:

- Unauthorised access (hacking) - for example, where students access areas of an IT system to change their grades or look at test answers
- Denial of service (booting) - where a network is overrun, or an attempt is made to achieve this.
- Malicious software (malware) - activity which introduces, or attempts to introduce viruses into IT systems

Staff who have concerns about this should report it to the DSL, who can, alongside the Commissioner, refer the individual to the Cyber Choices programme. This programme aims to intervene when young people are at risk in this way.

## 12. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and can pose serious safeguarding and child protection risks.

There is also now a Homelessness Duty imposed through the Homelessness Reduction Act 2017, which places a duty on local authorities to focus on early intervention to prevent homelessness in their areas. Earlier intervention can help prevent children and young people becoming homeless. Through the Commissioner, TKW will help to promote links into the Local Housing Authority to allow the parent/caregiver to raise or promote risk at the earliest opportunity.

## 13. Looked After Children

All staff at ELKOLET will have an awareness of issues around safeguarding looked after children through the regular training provided. ELKOLET is aware that looked after children (and those previously looked after) may have extra needs and may need extra support to achieve desired education outcomes.

All staff will be made aware of the legal status of a looked after child's care arrangements, their looked after legal status (whether they are looked after under voluntary arrangements with consent

of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. The DSL will have details of the student's social worker and any other contacts of authorities involved in the looked after child's life.

As TKW is a small AP and deals with many at risk young people, the DSL ensures that all teachers and volunteers are able to promote educational and personal achievement of the child and respond quickly and effectively to any safeguarding concerns.

## 14. Pupils with Special Educational Needs, Disabilities, or Health Issues

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the child's condition without further exploration.
- The fact that these children can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The fact that these children are at increased risk of abuse and exploitation whether from peers, those who seek to harm children, or criminal gangs.
- The potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

TKW therefore looks to address this issue through raising awareness amongst staff, offering tailored support, bespoke timetables and one-to-one tuition, and ensuring communication with children in these groups is effective. It may also involve referral to CAMHS or supporting any such referral through the Commissioner.

## 15. Opportunities to Teach Safeguarding

ELKOLET will ensure that children are taught about safeguarding, including online safety. We as an AP, recognise that a 'one size fits all' approach is not appropriate for all children, and therefore a more personalised and bespoke approach is used. As nearly all of our cohort is made up of vulnerable children, safeguarding is handled in a very sensitive yet open manner to ensure that everyone feels comfortable discussing topics and is able to speak about their experiences with staff

TKW's Relationship and Sex Education Policy details how the organisation follows the Statutory Guidance: Relationships Education and Relationships and sex education (RSE). This can be found at [www.elkolet.com/policy-center](http://www.elkolet.com/policy-center) or upon request.

TKW is aware that its responsibilities extend to the safety of students outside of school both online and in person. Consequently, TKW works with all relevant community agencies, such as CAMHS, STOP Domestic Abuse and Children's Services, to create a holistic support network for the young person.

## 16. Safeguarding and Child Protection Procedures

Where there is a child protection or safeguarding concern about a student, all staff at ELKOLET will follow the necessary child protection procedures if an incident occurs.

In all instances regarding the safeguarding of a child, the Commissioner will be informed and/or involved in the course of action taken.

Where the concern is immediate and of significant risk to the child, the police/children's services will be contacted immediately; the commissioner will be contacted soon after this procedure has been followed. If the DSL is not immediately available, any member of staff or volunteer can make a referral to the police in an emergency, or to children's services if there is a child protection or safeguarding concern.

Where the risk is considered to be less serious, the commissioner will be directly involved in the decisions and process taken, unless otherwise expressly stated and agreed upon by all parties involved.

A member of staff at ELKOLET who suspects that any student may have been subject to abuse, neglect, or exploitation, or a student has suggested that abuse has taken place must bring this information to the Designated Safeguarding Lead (DSL) immediately.

The DSL and Commissioner will:

- Ensure the allegation is acted on immediately, no later than within the same school day.
- Determine the most appropriate course of action, for instance the DSL and Commissioner may start the referral for Early Help.

Teaching staff and other designated professionals are responsible for reporting concerns relating to:

1. Female Genital Mutilation (FGM) and reporting is mandatory where either the individual:
  - a. Is informed by a girl under 18 that an act of FGM has been carried out on her; or they
  - b. Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.
2. Allegations or concerns about serious peer-on-peer abuse which require a safeguarding or child protection response (rather than being dealt with under the AP's behaviour policy)
  - a. In the case of a violent sexual assault or sexual harassment, ELKOLET will follow the latest procedures as set out in Part 5 of KCSIE, 2024.
  - b. Staff must record the allegation and report it to the DSL immediately, but not investigate it themselves.



- c. The DSL will inform the Commissioner, and together relevant children’s social care team.
  - d. The DSL and Commissioner will put a risk assessment and support plan into place for all children involved, with a named person they can talk to if needed. This person may be at ELKOLET of the Commissioning School/Agency, or both; this will be decided on a case-by-case basis. Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
  - e. Where a child’s behaviour causes significant harm to other students, the continuation of their placement with TKW will be reviewed with the commissioner in line with the safeguarding and behaviour protocols of the local area, TKW and commissioner.
3. Where the issue involves ‘sharing nude or semi nudes’ (also known as sexting) by using online communications, text, or image messaging
- a. Refer to the Online, Email and Social Media Policy.
  - b. The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at <https://www.ceop.police.uk/Safety-Centre/>
  - c. Other guidance is available: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
4. Where there is an issue relating to radicalisation or extremism
- a. The DSL will be the first point of contact for any issues of concern in relation to extremism.
  - b. If the DSL is not available, staff should speak with the designated contact from the Commissioner.
  - c. If it is an emergency situation, the member of staff should call 999 or the confidential anti-terror hotline: 0800 789 321.
  - d. There is also a dedicated phone line at the Department of Education which offers help and guidance to staff and governors: call 0207 340 7264 or email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). However, unless in exceptional circumstances staff should always contact the Commissioner first.
  - e. The DSL and Commissioner will assess the level of risk and decide which agency to make a referral to. This could include Channel - the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism - or the local authority children’s social care team.

Where risk factors (such as a child with a mental health need, a parent in prison, persistent absences from school, or a risk of FGM) are present but there is no evidence of abuse or a particular risk, the DSL at ELKOLET will advise staff on preventative work that can be done either within the learning timetable or together with partners. All work in TKW or with partner agencies will directly involve the designated professional from the Commissioner.

Any referral to outside agencies, for example the Multi- Agency Safeguarding Hub (MASH) or Local Safeguarding Children's Partnership, will be done by the Commissioner with the support of the DLS at TKW.

It may be appropriate to speak with the student's family. The DSL and Commissioner will make this decision and decide who is the best individual to carry out the contact.

## 17. Suitability of Staff and Safer Recruitment Practices

TKW recognises that safer recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff and volunteers are suitable to do so and therefore do not pose any kind of risk to our students. Please see our Safer Recruitment Policy for more detailed information.

At least one member of the recruitment panel is 'Safer Recruitment' trained. The process checks identity, criminal record (Enhanced DBS), physical and mental capacity to work, right to work in the UK, professional qualifications and history of experience through references.

TKW will also obtain written notification from any agency or third party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform.

## 18. Training

ELKOLET ensures all staff, volunteers and trustees complete safeguarding and child protection training as part of their induction. This includes online safety and whistleblowing procedures and is designed to ensure all parties:

- Understand the school's safeguarding systems,
- Their responsibilities,
- Can identify signs of possible abuse or neglect or exploitation,
- Know how to act upon any concerns they have.

Training is considered as part of wider staff training. ELKOLET updates all safeguarding training with staff annually and adequate time is allocated for all parties to complete this. Any updates to training throughout the year will be communicated with staff, volunteers and trustees accordingly.

The DSL will regularly attend other training courses and appropriate inter-agency training annually. The DSL will also attend Prevent training and subsequently deliver this to all staff and volunteers.

Contractors will receive safeguarding training where required or when otherwise considered necessary.

## 19. Allegations against members of staff

Where an allegation of abuse is made against a member of staff, volunteer or those working in or on behalf of ELKOLET in relation to a student, it must be brought to the attention of the Director of Education and Family Support immediately. In line with KCSIE 2024, TKW has two levels of allegation management. The first is allegations which meet the harms threshold, and the second is in relation to low-level concerns which do not meet the harms threshold.

### Allegations which meet the harms threshold

Where the allegation meets the threshold, the Director will act as the “case manager”. They will conduct basic enquiries to ascertain whether there is any foundation to the allegation and will liaise with the Commissioner, LADO and other authorities as appropriate. The case manager will follow the procedure detailed at Part 4 of KCSIE 2024.

In the event the Director is the subject of the allegation, the Trustee who manages safeguarding will assume the role of “case manager”.

The threshold may be met in the following circumstances:

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

This includes behaviour outside of school that might make the person unsuitable to work with children (known as a transferable risk).

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 this is the case, the Director will ensure that the appropriate action is taken.

### Allegations which do not meet the harm threshold

Low-level concerns are those which do not meet the harms threshold or are otherwise not serious enough to consider a referral to the LADO. Everyone is encouraged to report low level concerns, even by way of a self-referral, so that inappropriate or concerning behaviours are dealt with early and professional boundaries are maintained.

Low-level concerns include: a staff member being over-friendly with children, using inappropriate language, favouring a child, or picking on a child, making inappropriate social media posts, taking photographs of children on their mobile phone, contrary to policy, humiliating a child and engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

Low-level concerns will be dealt with efficiently and appropriately in line with the relevant policies.

In the event of a low-level concern being raised with the Director, they will:

- Collect evidence from witnesses and from the person concerned.
- Collate the information and advise what actions should be taken
- Keep a record of the concerns.

All information will be held in confidence and securely, in line with data protection laws (the Data Protection Act 2018 and UK GDPR).

Records will be reviewed regularly to identify any patterns or systematic issues within the ELKOLET. Patterns of staff behaviour could result in a more serious concern that meets the threshold test or results in disciplinary action for an individual.

## 20. Whistleblowing

Where a staff member at ELKOLET feels unable to raise an issue with the organisation or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

ELKOLET's Whistleblowing Policy can be found here at [www.elkolet.com](http://www.elkolet.com) and within the Staff Handbook.

General guidance on whistleblowing can be found on the government website here; <https://www.gov.uk/government/publications/whistleblowing-guidance-and-code-of-practice-for-employers>

## 21. Confidentiality and record-keeping

ELKOLET staff have a professional responsibility to share relevant information about the protection of children with the DSL. Staff and the DSL also have a responsibility to share information regarding child protection with the Commissioner and potentially external investigating agencies (under the guidance of the DSL and Commissioner together).

Staff must ensure they handle any concern that a student brings to them sensitively and makes no promise to keep the information a secret at that stage; the concern must be raised with the DSL and it may need to be escalated and other agencies involved to safeguard the child.

Accurate, signed, and dated written notes must be kept of all safeguarding and related incidents and child protection concerns relating to individual students. Should a member of staff or volunteer 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.

All child protection documents will comply with the schools Data Protection Policy and relevant data protection regulation. Child protection documents will be held separately from other students records and will be stored securely, by password protecting electronic files. All paper records are stored in a locked cabinet with restricted access.

Information from child protection files will only be shared with relevant staff when it is necessary to do so (following the government's seven golden rules for data sharing) and in a manner that is consistent with data protection law.

As ELKOLET works directly with Commissioners to provide education for the students, all information must be shared between the parties to provide the best support for the individual. Consequently, TKW provides incident reports, child protection and safeguarding reports and daily and/or weekly

updates to the Commissioner. This is alongside the daily attendance and regular termly meetings. The information is shared via email with S/MIME encryption.

If ELKOLET receives a request for direct access to, or copies of, AP documentation held on a child protection file, the DSL will be informed, and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.

Any external individual or organisation contracted ELKOLET to work with the students (for example, a child psychologist) must report any child protection incidents or disclosures from students to the DSL at the earliest opportunity. As part of their contracts with ELKOLET, all individuals, bodies or organisation will be required to work in line with our Safeguarding and Child Protection Policy.

## 22. Working with parents/individuals with parental responsibility

It is important, where appropriate, to work with parents/guardians to ensure the welfare and safety of the child.

TKW does this by:

- Making parents aware of the AP's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students, where necessary, by making all policies available on the website and upon request.
- Working with parents to support the needs of their child including raising awareness through parental workshops and signposting to relevant agencies or support networks.
- Only notifying the parents where there is no increased the risk to the child or others by doing so. If there is a risk posed, the action will be discussed with the Commissioner.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved if the proviso above is satisfied.
- Ensuring a robust complaints system is in place to deal with issues raised by parents.

## 23. Equal opportunities

ELKOLET must consider the Equality, Inclusion, and Diversity Policy when discharging their duties under this policy.

## 24. Health and safety

The relevant Trustee will work alongside the Director of Education and Family Support to ensure a robust, up-to-date Health and Safety Policy is in place for the safety of all students, staff, volunteers, contractors, and visitors.

ELKOLET ensures there are relevant risk assessments and procedures from the findings to manage risks to the specific parties.

The full Health and Safety Policy and all related policies can be found on our website [www.elkolet.com](http://www.elkolet.com) or are available on request.

## 25. Monitoring and review of this policy

The Designated Safeguarding Lead (DSL) will monitor the working of this policy and will report as required to the Director of Education and Family Support and the designated Trustee. It will be reviewed as required and annually.

## Appendix 1- Law and Guidance

This policy has been developed in accordance with the law and guidance found at <https://www.gov.uk/> that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:

- [Alternative Provision Statutory Guidance](#)
- [Keeping Children Safe in Education 2024](#)
- [Working Together to Safeguard Children.](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [The Education Act 2002](#)
- [Guidance on Information Sharing](#)
- [School Staffing Regulations- Schedule 2](#)
- [School Staffing Regulations- Section 9](#)
- [Teacher's Standards](#)
- [Teaching Online Safety in Schools.](#)
- [Meeting digital and technology standards in schools and colleges](#)
- [Multi-agency Statutory Guidance on Female Genital Mutilation.](#)
- [Information About Mandatory Reporting of Female Genital Mutilation.](#)
- [Forced Marriage Unit Statistics 2022](#)
- [Statutory Guidance on Forced Marriage](#)
- [Protecting Children from Radicalisation: The Prevent Duty.](#)
- [The Prevent Strategy: A Guide for Local Partners in England.](#)
- [Preventing Youth Violence and Gang Involvement.](#)
- [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)
- [Mental Health and Behaviour in Schools: Departmental Advice.](#)
- [Sharing Nudes and Semi-Nudes Advice for Education Settings](#)