



**Onside Education**  
**Safeguarding and Child**  
**Protection Policy**  
**Sept 2025**

# 1. Statement of Intent

## 1.1

Onside Education is dedicated to safeguarding and promoting the physical, mental, and emotional welfare of every child and young person. Our safeguarding arrangements are based on four key principles:

i) Safeguarding is everyone's responsibility

All staff, advocates and volunteers must understand and fulfil their duty to keep children safe. We prioritise safeguarding and child protection in all policies and processes, acting at all times in the best interests of the child.

ii) Children are at the heart of everything we do

We strive to understand the needs and views of children and young people, recognising the importance of enabling them to speak openly about concerns. Children should feel confident they will be listened to and know how to report worries and disclose harm.

iii) Strong relationships with parents, carers and the community

We aim to know children and families well, understand their concerns, and address barriers to learning, attendance, behaviour and participation. Our goal is for children and families to experience equity, belonging and safety.

iv) Together we are stronger

We support and challenge one another to make the best decisions for children and continuously improve. We invest in a highly trained workforce and maintain strong safeguarding leadership and oversight.

## 1.2

This policy provides a clear and consistent framework for implementing this statement of intent. It will be achieved by:

- Ensuring all staff, advocates and volunteers understand their safeguarding responsibilities in line with statutory guidance and local safeguarding arrangements, are alert to signs of abuse and know how to report concerns to the DSL (or deputy).
- Teaching children and young people how to stay safe and make informed choices, including online.
- Identifying and providing support for any child who has been harmed or is at risk of harm, abuse, neglect or exploitation.
- Creating a culture of safer recruitment through robust checks and procedures to deter, reject or identify individuals who might pose a risk to children, and

only appointing staff after appropriate checks are completed (See Safer Recruitment and Single Central Record Policy Sept 2025).

### 1.3

This policy does not duplicate statutory guidance. It must be read alongside:

- Keeping Children Safe in Education 2025 (KCSIE 2025)
- Working Together to Safeguard Children 2023

## **1.4 Governance and Safeguarding Leadership (Tamworth – Staffordshire)**

### **Governance Structure and Accountability**

Onside Education Tamworth operates under a clear and robust governance structure that ensures safeguarding responsibilities are well-defined, effectively overseen, and subject to appropriate challenge.

The proprietor and responsible body, U-Educate, holds overall accountability for safeguarding and child protection arrangements. This includes ensuring that statutory duties are met, policies and procedures are implemented effectively, and safeguarding practice is regularly reviewed and quality assured.

Strategic safeguarding oversight is provided by a senior leader with responsibility for ensuring that safeguarding systems, training, recording, and escalation arrangements are compliant with statutory guidance, including Keeping Children Safe in Education 2025 and the Independent School Standards.

Operational safeguarding responsibility sits at provision level, with a named Designated Safeguarding Lead (DSL) and Deputy DSL (DDSL) who are appropriately trained, resourced, and available to respond to concerns on the same day.

Onside Education uses Et-Aims as its central system for recording behaviour, safeguarding concerns and related pastoral information.

### **Separation of Strategic Oversight and Operational Safeguarding**

Onside Education recognises the importance of clear separation between strategic oversight and day-to-day safeguarding decision-making.

- The DSL and DDSL are responsible for the operational management of safeguarding, including triage of concerns, referrals, record-keeping, early help, and liaison with local safeguarding partners.
- Strategic leaders provide oversight, challenge, and assurance, but do not compromise the independence or integrity of safeguarding decision-making at provision level.

Where concerns or allegations involve senior leaders, or where additional challenge is required, Onside Education will seek independent safeguarding advice and will consult the Local Authority Designated Officer (LADO) in accordance with statutory guidance.

### **Allegations, Escalation and Independent Challenge**

Onside Education has clear and transparent reporting and escalation routes to ensure that no individual is required to manage concerns or allegations about themselves or a role they oversee.

- Allegations or concerns about staff, volunteers or contractors are escalated through defined leadership routes.
- Allegations involving senior leaders, including those with safeguarding oversight responsibilities, are referred directly to the LADO and managed in line with statutory procedures.
- Where appropriate, external safeguarding professionals may be engaged to provide independent scrutiny and assurance.

This approach ensures safeguarding decisions are objective, lawful and in the best interests of children, and that governance arrangements remain robust and credible.

### **Safeguarding Policy Review, Approval and Assurance**

In accordance with the Independent School Standards and Keeping Children Safe in Education (KCSIE) 2025, Onside Education ensures that safeguarding arrangements are not only documented but are implemented effectively, monitored routinely and kept under continuous review.

This Safeguarding and Child Protection Policy is approved by the Proprietor / Responsible Body (U-Educate) and is owned at governance level. The policy is reviewed at least annually, and additionally immediately following:

- any serious safeguarding incident or allegation,
- changes to statutory guidance (including updates to KCSIE),
- learning from audits, complaints or external review.

The effective implementation of this policy is assured through a defined safeguarding quality-assurance cycle, which provides clear evidence of practice in operation. This includes:

- Monthly Single Central Record (SCR) audits, with actions recorded and followed up.

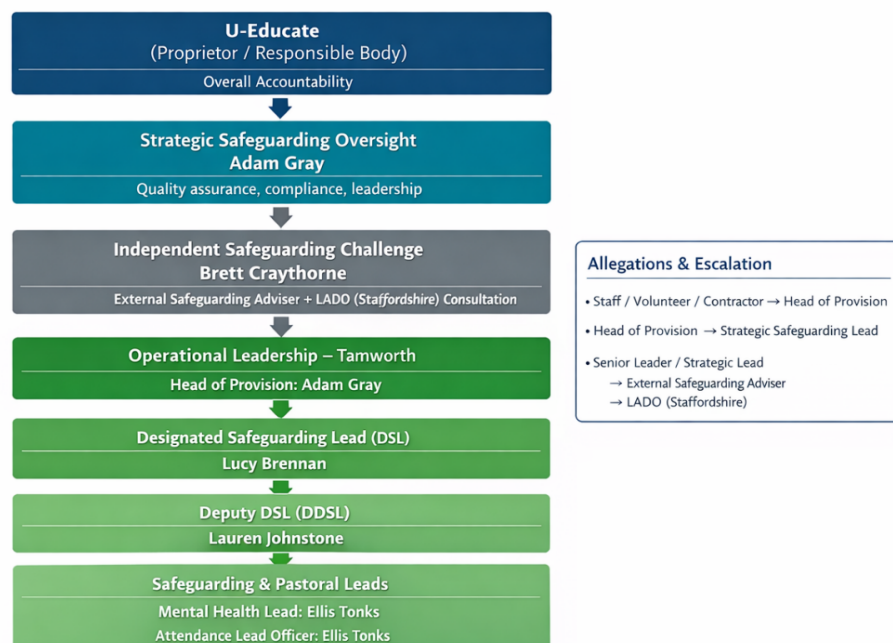
- Termly safeguarding case-file sampling and review, including evaluation of decision-making, chronologies and outcomes.
- Termly safeguarding training compliance checks, including induction completion and KCSIE reading confirmations.
- Termly review of online safety filtering and monitoring arrangements, including alerts, trends and safeguarding actions taken.
- Learner voice and pastoral intelligence, used to inform safeguarding priorities, curriculum planning and risk assessment.

Findings from assurance activity are reported to the proprietor / responsible body, used to provide challenge and scrutiny where required, and directly inform policy updates, staff training, and safeguarding improvement planning.

### Responsible Body / Proprietor / Governance Structure – Tamworth

#### Responsible Body, Safeguarding Oversight & Escalation

Onside Education – Tamworth (Staffordshire)



### Policy Assurance, Review and Quality Assurance (Tamworth – Staffordshire)

This Safeguarding and Child Protection Policy is owned by the Proprietor/ Responsible Body (U-Educate) and is approved on behalf of the proprietor by the Strategic Safeguarding Oversight Lead / Head of Provision (Tamworth). The Designated Safeguarding Lead (DSL) is responsible for ensuring the policy is implemented consistently in day-to-day practice, with oversight and challenge provided through the governance structure.

The policy is reviewed at least annually, and additionally following any significant safeguarding incident, changes to statutory guidance (including KCSIE), learning from audits/complaints, or changes to local safeguarding arrangements.

Implementation is monitored through a planned programme of assurance activity, including:

- Single Central Record (SCR) audit – monthly (recorded with actions and timescales).
- Safeguarding training compliance – termly (induction completion, Part 1 KCSIE confirmations, updates).
- Safeguarding file sampling and case review – termly (quality of records, chronologies, decision rationale, outcomes).
- Online safety filtering/monitoring oversight review – termly (alerts review arrangements, trends, actions taken).
- A safeguarding dashboard/report is provided to the proprietor/responsible body termly, summarising key themes, audit outcomes, actions, and assurance that safeguarding arrangements are effective and improving.

## **2. Legal Framework**

### **2.1 Statutory guidance**

This policy is informed by, and must be applied in accordance with, current statutory guidance and legislation, including:

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023
- Local safeguarding partner arrangements, including published thresholds and levels of need guidance relevant to each provision's location

Onside Education will comply with the expectations set out in this guidance and with the procedures of the relevant local safeguarding partners.

### **2.2 Legislation and statutory guidance (non-exhaustive)**

This policy takes account of the following legislation and statutory guidance, as applicable to the nature of Onside Education's provisions and services:

- Children Act 1989
- Children Act 2004
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010 (Public Sector Equality Duty)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Domestic Abuse Act 2021

- Marriage and Civil Partnership (Minimum Age) Act 2022
- Voyeurism (Offences) Act 2019
- Police and Criminal Evidence Act 1984 – Code C
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) (information sharing, record keeping and data security)
- Disqualification under the Childcare Act 2006 (where applicable)
- Multi-agency statutory guidance on female genital mutilation
- Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism
- Multi-agency statutory guidance for dealing with forced marriage
- Working together to improve school attendance

Where legislation or statutory guidance is not relevant to a particular provision or type of service, this will be clearly reflected in that provision's local safeguarding policy.

### **2.3 Non-statutory guidance (examples)**

In addition to statutory requirements, this policy is informed by relevant non-statutory guidance and best practice, including:

- Information sharing advice for safeguarding practitioners
- Mental health and behaviour in schools
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Guidance for safer working practice for those working with children and young people in education settings
- Prevent duty guidance and Channel guidance
- Children missing education guidance
- Child abuse concerns: guide for practitioners
- Child sexual exploitation: definition and guide for practitioners
- Criminal exploitation of children and vulnerable adults (including county lines)

## **3. Overall Aims**

### **3.1**

This policy aims to protect and safeguard all children by ensuring staff:

- understand safeguarding responsibilities
- remain vigilant to need, risk and harm
- follow the procedures in this policy consistently

### **3.2**

This policy applies to:

- all Onside Education provisions and programmes (onsite and outreach)
- any establishment commissioned to deliver education on our behalf (with assurance and oversight expectations)

## **4. Roles and Responsibilities in Recognising Needs, Harm, and Abuse**

### **4.1 All staff: Recognise, Respond, Record/Report**

#### **Recognise**

All adults working with children must be able to identify signs of abuse and neglect and maintain an attitude of “it could happen here”. Staff must exercise professional curiosity and follow up even small or “niggling” concerns.

#### **Respond**

All adults are “trusted adults” and are expected to be emotionally available, listen carefully and respond appropriately. Harmful behaviours are not ignored.

#### **Record/Report**

All concerns or disclosures must be recorded promptly, factually and securely using the Safeguarding Incident Report Form (or approved electronic system).

- Concerns must be reported to the DSL/DDSL the same day.
- Where there is immediate risk of serious harm, staff must make an immediate verbal report to the DSL/DDSL and/or contact children’s social care/police as appropriate.

#### **Access to recording systems**

- Staff will have access to secure safeguarding folders or protected electronic systems.
- Staff without access must report immediately to DSL/DDSL and submit a written report as soon as possible.
- All safeguarding concerns, disclosures and incidents must be recorded promptly, factually and securely using Et-Aims, Onside Education’s central safeguarding and behaviour recording system.
- Records must be completed on the same day and escalated to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay.

#### **Staff reading requirements and confirmations**

Onside Education requires:

- Staff who work directly with children: must read at least Part One of KCSIE 2025 and are expected to read Annex B (Further Information). [GOV.UK+1](#)

- Staff who do not work directly with children: must read Part One or Annex A (as determined by the setting), and receive appropriate safeguarding training and updates. [GOV.UK](https://www.gov.uk)
- All staff: must understand how to report concerns, including concerns about adults (Part Four expectations) and the low-level concerns process.

All staff must sign annually to confirm they have read and understood the required sections.

Staff are also expected to:

- Provide a safe environment for children to learn.
- Raise concerns with the DSL/DDSL; if immediate risk, refer to children's social care/police as required.
- Understand early help and their role in identifying emerging need.
- Understand the statutory duty to report FGM for girls under 18 (where it appears to have been carried out).
- Be aware that mental health problems can be an indicator of abuse/neglect/exploitation.
- Follow attendance/CME procedures and report children missing/absent concerns.
- Understand and follow online safety, filtering and monitoring expectations.
- Raise concerns about poor or unsafe practice via whistleblowing.
- Challenge decision-making appropriately and never assume a concern has been addressed.

#### **4.2 Responsible body / Directors / Governance oversight**

The responsible body/proprietor must ensure:

- A DSL is appointed from the senior leadership team and given time, authority, training and resources to fulfil the role. [GOV.UK](https://www.gov.uk)
- An appropriate number of Deputy DSLs are in place and trained to the same standard.
- Safeguarding policies and procedures are implemented, reviewed and quality assured.
- Safer recruitment is embedded, with appropriate checks for all staff, supply/agency and volunteers.

- Allegations and low-level concerns procedures are robust and known to all staff.
- Staff induction and ongoing safeguarding updates occur at least annually (and more often as needed).
- The proprietor/responsible body receives regular safeguarding assurance reports in line with Section 1.4. of this policy

### **4.3 Head of Provision / Programme Leads**

Heads of Provision / Programme Leads are responsible for ensuring:

- Local implementation of this policy and KCSIE 2025.
- A provision-level DSL is identified and supported with time and resources.
- Induction is completed for all new staff, including safeguarding reporting routes, online safety, behaviour policy, code of conduct and reading requirements.
- Staff understand and follow procedures for concerns, referrals and record-keeping.
- Safeguarding culture is actively promoted (visibility, supervision, updates, learning).
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### **4.4 Safeguarding Advocates**

Safeguarding advocates:

- provide support, challenge and local community/context intelligence
- liaise with the Head of Provision/Programme Lead and DSL/CDSL
- conduct monitoring visits and support continuous improvement
- complete appropriate safeguarding training and annual reading/confirmation appropriate to their role

### **4.5 Designated Safeguarding Lead (DSL)**

The DSL takes lead responsibility for safeguarding and child protection (including online safety, and understanding filtering/monitoring systems). [GOV.UK](https://www.gov.uk)

At Onside Education, the DSL will:

- lead safeguarding and child protection
- promote a culture of listening to children

- act on and triage concerns on the same day
- maintain high-quality safeguarding records, chronologies and decision rationale using Et-Aims (CRM), ensuring secure retention, appropriate access and timely transfer of information
- ensure secure retention and transfer of child protection files
- work with local safeguarding partners, understand thresholds and referral routes
- ensure staff training, updates and supervision arrangements are in place
- oversee online safety, including monitoring reports and escalation processes
- establish and maintain the early help offer and processes
- undertake refresher training at least every two years and keep knowledge up to date
- Incidents recorded on Et-Aims are reviewed by the DSL to identify patterns, escalation or safeguarding risk, and are cross-referenced within safeguarding chronologies where appropriate.

#### DSLs Approach: Respond/Refer, Review, Reflect

##### Respond/Refer

- Any member of staff can make a referral to children's social services, though it is typically done by the DSL.
- The DSL manages all responses, actions, case notes, and chronologies via the safeguarding folder.
- The DSL promptly triages all concerns against the levels of need thresholds guidance.
- Usually, the DSL decides the most appropriate action, possibly consulting with the 'front door' to children's social care.
- If no referral is made, the DSL will document the rationale for this decision.

##### Review

- The Lead DSL ensures cases are regularly reviewed through meetings with other DSLs, programme leads, and pastoral staff.
- This review process includes concerns not referred to children's services and students frequently absent.
- Safeguarding records and practice contribute to the organisation's formal assurance and audit cycle as set out in Section 1.4

## Reflect

- Lead DSLs should encourage staff to challenge them when necessary and be open to such challenges.
- They should reflect on their practices to ensure safeguarding policies, systems, and processes are continuously reviewed.
- All DSL-trained staff are encouraged and expected to access regular supervision.

### **4.6 Child Protection File Transfer and Retention**

Onside Education ensures that child protection records are retained and transferred securely in line with Keeping Children Safe in Education (KCSIE) 2025, UK GDPR, and local safeguarding partner guidance. Child protection files are kept separately from academic records, stored securely, and accessed only by the Designated Safeguarding Lead (DSL), Deputy DSL (DDSL), or authorised safeguarding leaders. Records are retained for the period specified in safeguarding retention guidance and reviewed to ensure accuracy and relevance. When a child moves provision, the child protection file is transferred promptly and securely to the receiving setting's DSL, confirmation of receipt is obtained, and the transfer is recorded. Where the receiving setting is unknown, delayed, or unwilling to accept the file, the DSL will retain the record securely and seek advice from the relevant safeguarding partner as appropriate.

### **4.7 Safer Recruitment & Single Central Record (SCR)**

#### **Safer Recruitment Commitment**

Onside Education is committed to safer recruitment practices to deter, identify and reject individuals who may pose a risk to children and young people. Safer recruitment forms a core part of our safeguarding arrangements and is implemented in line with Keeping Children Safe in Education (KCSIE) 2025 and the Independent School Standards.

Safeguarding considerations are embedded throughout the recruitment and appointment process, including advertising, shortlisting, interview, appointment, induction and ongoing supervision.

#### **Single Central Record (SCR)**

Onside Education maintains a Single Central Record (SCR) for all staff, supply staff, agency workers, contractors and volunteers who work with children.

- The SCR Owner is the Head of Provision / Strategic Safeguarding Lead, or a nominated senior leader.
- The SCR is maintained and updated in real time as staff are appointed or roles change.
- A formal SCR audit is undertaken monthly, with outcomes recorded.
- Any omissions, discrepancies or concerns identified through audit are addressed immediately.

The SCR is available for inspection and forms part of the organisation's safeguarding quality assurance processes, including internal review and external safeguarding audit.

### **Pre-Employment Checks**

No individual is permitted to work with children unless the appropriate pre-employment checks have been completed and verified. These checks include, as applicable to role and legal requirements:

- Verification of identity
- Enhanced DBS check, including barred list check where required
- Right to work in the UK
- Verification of professional qualifications and/or professional status (where required)
- Two satisfactory references, including at least one from the most recent employer
- Prohibition from teaching check (where applicable)
- Section 128 direction check (where applicable)
- Overseas checks, where an individual has lived or worked abroad
- Confirmation of suitability to work with children

All completed checks are recorded on the Single Central Record.

### **Agency, Supply and Contractor Assurances**

Where staff are engaged through an agency or third-party provider, Onside Education obtains written confirmation that all required safeguarding and suitability checks have been completed in accordance with statutory requirements.

This includes confirmation of:

- Enhanced DBS status and barred list checks (where required)
- Identity and right to work checks
- Qualification and reference checks
- Ongoing suitability monitoring

Onside Education retains overall responsibility for safeguarding and does not rely solely on external assurances where concerns arise.

### **Supervision Pending Completion of Checks**

In exceptional circumstances, where it is lawful for an individual to begin work before all checks are completed, a written risk assessment must be completed and authorised by a senior leader.

In such cases:

- The individual will not be left unsupervised with children
- Clear supervision arrangements will be put in place and documented
- Outstanding checks will be completed as a priority
- Any failure to complete checks satisfactorily will result in the immediate cessation of duties

No individual is permitted to work unsupervised with children until all required checks are fully completed and recorded on the SCR.

### **Ongoing Monitoring**

Safeguarding suitability is an ongoing responsibility. Onside Education ensures that:

- Safer recruitment expectations are reinforced through induction and training
- Concerns about conduct or suitability are managed through low-level concerns and allegations procedures
- SCR compliance and safer recruitment arrangements are reviewed as part of safeguarding audits

Further detail regarding recruitment, selection and employment checks is set out in Onside Education's Safer Recruitment and Single Central Record Policy, which should be read alongside this Safeguarding and Child Protection Policy.

## 5. Our Role in Preventing Abuse

### 5.1

Safeguarding is integral to our ethos. We ensure all children:

- are treated with respect and dignity
- feel safe
- have a voice and are listened to

### 5.2

We recognise some children face additional safeguarding risks or barriers to disclosure. We make reasonable adjustments and provide equitable safeguarding. Staff must be fully aware of these risk factors. We are committed to anti-discriminatory practices and acknowledging the diverse circumstances of our children. We ensure that all children receive the same protection, regardless of any barriers they may face. We make reasonable adjustments, when necessary, in line with our safeguarding principles, particularly for children who:

- Have special educational needs or disabilities (SEND) or health conditions
- Have experienced mental health issues
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality
- Speak English as an additional language
- Are living in difficult situations, such as temporary accommodation or where there are issues like substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers or refugees
- Are recently bereaved
- Are at risk due to their own or a family member's mental health needs
- Are looked after or previously looked after
- Are frequently missing or absent from education
- Are at risk of being removed from the school's roll to be home Educated
- Do not attend full time
- Are members of the LGBTQ+ community

### 5.3

We are also aware of the contextual safeguarding risks our children face. Contextual safeguarding involves understanding and responding to young people's experiences of significant harm beyond their families. This approach seeks to identify and address harm and abuse that occurs outside the home, from either adults or other young people. As children grow older, they spend more time socialising independently, and the protection or abuse they encounter is influenced by their environment, neighbourhood, journey to school, use of social media, and relationships formed in these settings.

These extra-familial threats may arise within the provision, peer groups, the wider community or online. We recognise the different communities our provision's serve and the range of safeguarding risks in each community. Staff must fully understand these risks to minimise them through early identification.

- Each Provision will publish a detailed analysis of the risks to children in their care in its localised Safeguarding and Child Protection Policy.
- The CDSL (Central) will liaise with local police authorities and analyse and share this data with staff to ensure they understand the local context of their provision. These risks will be included in the provision's individual safeguarding policy and staff CPD, linking to the safeguarding curriculum for students.
- Onside Education have identified local risks and issues affecting student well-being and safety, including:
  - County Lines
  - SEMH (Social, Emotional, and Mental Health)
  - Emotional neglect (deprivation)
  - Online safety

This information will guide and personalise the safeguarding curriculum for children and staff training at Onside Education, as well as inform parents.

### 5.4

Online Safety: Onside Education recognises that online safety is an integral part of safeguarding and child protection. Appropriate filtering and monitoring systems are in place across all provisions to help protect children from harmful, illegal or inappropriate online content, including risks related to sexual exploitation, extremism, self-harm and online abuse.

The Designated Safeguarding Lead (DSL) has strategic oversight of online safety, including an understanding of how filtering and monitoring systems operate, the

categories of content blocked, and the escalation pathways for concerns identified. Day-to-day operational oversight may be delegated to appropriately trained staff; however, accountability for safeguarding decision-making remains with the DSL.

Alerts and monitoring reports generated by filtering and monitoring systems are reviewed regularly, proportionate to risk and usage, and acted upon without delay where concerns are identified. Where an alert indicates a safeguarding risk, the DSL will triage the concern, record actions taken, and determine appropriate next steps, which may include discussion with the child, engagement with parents or carers, early help intervention, or referral to children's social care or other agencies.

All online safety concerns, alerts and actions are recorded securely within the safeguarding recording system and contribute to the child's safeguarding chronology where appropriate. Patterns of concern are analysed to inform risk assessment, curriculum planning, staff training and safeguarding audits.

Online safety arrangements are reviewed as part of the organisation's safeguarding quality assurance processes to ensure they remain effective, proportionate and responsive to emerging risks.

## **6. What We Will Do When We Are Concerned**

### **6.1**

All staff must remain vigilant to changes in behaviour, presentation or emotional wellbeing, listen carefully to children and young people, and record and report any concerns in writing to the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) on the same day, in accordance with this policy.

### **6.2**

Safeguarding leads will adopt an assess, plan, do, and review approach, ensuring that actions and safety planning are proportionate, child-centred and responsive to the child's individual needs, with clear measures in place to reduce risk and support wellbeing.

### **6.3**

Where unmet needs are identified and the threshold for statutory intervention is not met, the DSL/DDSL will oversee the implementation of an appropriate early help response, in line with local safeguarding partner thresholds and guidance.

### **6.4**

Where a child is assessed as requiring a statutory response, the DSL/DDSL will follow the procedures of the relevant local safeguarding partners to make referrals to children's social care and/or the police, as appropriate.

## **6.5**

The DSL/DDSL will oversee and coordinate the agreed intervention, maintaining oversight of actions, outcomes, and ongoing risk, and ensuring that all decisions and rationales are clearly recorded.

## **6.6**

Any member of staff may make a referral directly to children's social care or the police if necessary. However, best practice is for concerns to be raised and managed through the DSL/DDSL, unless there is an immediate risk of serious harm or a reason the DSL/DDSL is not available.

## **6.7**

The safeguarding process is summarised in the flowchart in Appendix One, which sets out clear reporting, decision-making and escalation routes.

## **6.8**

Further guidance on making child protection referrals and understanding risk and harm is available in Keeping Children Safe in Education 2025 – Annex B, alongside relevant local safeguarding partner guidance.

## **6.9**

Where there is a concern that an adult working with children may have harmed a child, staff must follow Onside Education's "Allegations and Concerns Raised in Relation to Staff, Supply Staff, Contractors and Volunteers" policy. This policy details the procedures for managing allegations and low-level concerns, including when and how to contact the Local Authority Designated Officer (LADO). A flowchart is provided in Appendix Two, with further detail in Section 9 of this policy.

# **7. Types of Abuse and Neglect**

## **7.1**

Staff should be fully aware of the different types of abuse and neglect outlined below. All referrals to children's social care will fall under one or more of these broad categories.

## **7.2**

Child abuse is the maltreatment of a child by another person, whether an adult or another child. Abuse can involve inflicting harm or failing to prevent harm. Abuse, including neglect, and other safeguarding issues are rarely isolated events; multiple issues often overlap.

### 7.3

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm can also result from a parent or carer fabricating or inducing illness in a child.

### 7.4

Emotional abuse is the persistent emotional maltreatment of a child, causing severe and adverse effects on the child's emotional development. Emotional abuse may include:

- Conveying to a child that they are worthless, unloved, or only valuable insofar as they meet another's needs.
- Not allowing the child to express their views, deliberately silencing them, or mocking their communication.
- Imposing age-inappropriate expectations, overprotection, and limiting exploration or normal social interaction.
- Witnessing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing frequent fear or danger, or exploitation or corruption of children.

### 7.5

Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence. This can include:

- Physical contact, such as rape, oral sex, or non-penetrative acts like masturbation, kissing, or touching outside of clothing.
- Non-contact activities, such as involving children in looking at or producing sexual images, watching sexual activities, encouraging inappropriate sexual behaviour, or grooming (including via the internet). Staff should be aware that perpetrators of sexual abuse can be of any gender or age, including other children.

### 7.6

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, leading to serious impairment of health or development. Neglect can occur during pregnancy due to maternal substance abuse or after birth through failing to:

- Provide adequate food, clothing, and shelter.
- Protect from physical and emotional harm or danger.
- Ensure adequate supervision and appropriate medical care.

- Address basic emotional needs.

## 7.7

Exploitation recognises various forms of abuse where children are coerced into activities against their will, including sexual and criminal exploitation.

## 7.8

Child-on-child abuse is unacceptable and will be taken seriously. Staff should refer to Appendix 3 for detailed information on child-on-child sexual violence, sexual harassment, and harmful sexual behaviour. Staff must recognise that children can abuse other children, both in and outside of school, including online. We maintain an attitude of 'it probably is happening here,' recognising many reasons why such abuse often goes unreported. We foster a culture where students feel confident to speak up about their concerns.

Child-on-child abuse can include:

- Bullying (including cyberbullying and discriminatory bullying).
- Abuse in intimate personal relationships between children.
- Physical abuse, such as hitting, kicking, or otherwise causing harm.
- Sexual violence and harassment.
- Causing someone to engage in sexual activity without consent.
- Sharing of nude or semi-nude images (sexting).
- Upskirting.
- Initiation - violence and rituals.

Most cases will be handled under the Onside Education's behaviour policy, but this safeguarding policy will apply to allegations raising safeguarding concerns, including those that are serious, potentially criminal, or pose risks to students.

## 7.9

To create a positive school culture and minimise child-on-child abuse, staff should:

- Model positive and respectful behaviours.
- Use opportunities to teach about respectful behaviours.
- Be informed about issues affecting people with protected characteristics.
- Be vigilant to issues affecting different genders.
- Create an environment where students feel heard.
- Challenge derogatory or sexualized language and inappropriate behaviour.

- Ensure the curriculum Educates on appropriate behaviour and consent.
- Report 'hot spots' where abuse may occur.

#### 7.10

Staff training will ensure understanding of:

- Signs of child-on-child abuse.
- How to respond to reports.
- The likelihood of underreporting.
- Additional barriers for some children.
- Immediate action on any concerns.
- Potential signs of a student harming another child as an indicator of being abused themselves.

#### 7.11

Procedures for dealing with allegations of child-on-child abuse: Staff must take allegations seriously, report them to the DSL, and record them on the safeguarding incident report form, without investigating. The DSL will contact local authority children's social care and police if needed.

#### 7.12

Children frequently missing/absent from education: Children missing from school face additional risks. Staff must follow our procedures for children missing/absent from education and requirements in KCSIE 2025, outlined in the Onside Education Attendance Policy.

## **8. Our Role in Preventing Radicalisation**

### **8.1**

All staff will receive Prevent training appropriate to their role, enabling them to identify children who may be vulnerable to being drawn into terrorism or extremist ideologies and to respond appropriately. Training needs will be informed by local risk assessments and refreshed regularly through safeguarding updates.

### **8.2**

Radicalisation refers to the process by which an individual comes to support terrorism or extremist ideologies associated with terrorist groups.

### **8.3**

Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of the armed forces.

#### **8.4**

Terrorism is defined as action or the threat of action that:

- endangers life or causes serious violence to a person or people
- causes serious damage to property
- seriously interferes with or disrupts electronic systems

#### **8.5**

The use or threat of terrorism is designed to influence the government or intimidate the public and is carried out for political, religious or ideological purposes.

#### **8.6**

Onside Education recognises its statutory duty under the Prevent Duty to have due regard to the need to prevent children and young people from being drawn into terrorism.

#### **8.7**

Each provision will identify a Single Point of Contact (SPOC) for Prevent-related concerns. The SPOC will normally be a DSL-trained member of staff and will:

- act as the link with local authorities, safeguarding partners and the police where concerns arise
- complete Prevent awareness training
- support and advise staff on identifying and responding to concerns

A list of provision-level SPOCs is maintained in Appendix Six.

#### **8.8**

Risk assessments relating to radicalisation and extremism will be informed by the local context, including community risks and online influences, and will be reviewed regularly and when circumstances change, in collaboration with local safeguarding partners and the police where appropriate.

#### **8.9**

Appropriate internet filtering and monitoring systems will be in place to reduce the risk of children accessing extremist material online. These systems will support both

online safety and the Prevent duty, and concerns identified through filtering or monitoring will be acted upon promptly by the DSL/SPOC.

### **8.10**

There is no single profile of a child who may be susceptible to radicalisation. Vulnerability can occur gradually or rapidly, and may be influenced by personal, social or emotional factors.

### **8.11**

Staff will remain vigilant to changes in behaviour, attitudes or presentation that may indicate vulnerability to extremist influence and will report concerns in line with this policy. Further guidance and resources are available via [Educate Against Hate](#), which staff are encouraged to use to support their understanding and practice

## **9. Responding to an Allegation or Concern About a Staff Member, Including Supply Staff, Volunteers, and Contractors**

### **9.1**

Onside Education has a separate policy titled “Allegations and Concerns Raised in Relation to Staff, Supply Staff, Contractors and Volunteers”, which sets out the procedures for managing allegations, low-level concerns, and whistleblowing matters. All staff must be familiar with this policy and with Part Four of Keeping Children Safe in Education 2025, which outlines statutory expectations for managing concerns about adults working with children.

All concerns, discussions, decisions and outcomes are recorded on the appropriate safeguarding or low-level concerns system and retained in accordance with relevant legislation and data protection requirements.

### **9.2**

An allegation or concern may relate to any adult working with children within Onside Education, including (but not limited to):

- teachers and tutors
- supply and agency staff
- support staff
- volunteers
- contractors and external professionals

### **9.3 Reporting concerns**

All staff must report any allegation or concern about an adult's conduct immediately and without discussing it with the individual concerned, using the following reporting routes:

- Concerns about a member of staff, volunteer, contractor or supply worker:  
Report to the Head of Provision / Programme Lead without delay.
- Concerns about the Head of Provision / Programme Lead:  
Report directly to the Director of Alternative Provision.
- Concerns about a Director of Alternative Provision or senior leader at director level:  
Report directly to the Chief Executive Officer (CEO).

These reporting routes are summarised in Appendix Two.

### **9.4 Escalation and LADO consultation**

The Head of Provision / Programme Lead (or senior leader receiving the concern) will:

- assess whether the concern meets the threshold for an allegation or constitutes a low-level concern
- consult with the Local Authority Designated Officer (LADO) where an allegation threshold may be met
- ensure that appropriate action is taken in line with statutory guidance and local safeguarding partner procedures

Where necessary, senior leaders will seek advice from the LADO before taking any further action.

### **9.5**

All staff must adhere to Onside Education's expectations for professional conduct and safe working practice and must act in accordance with the latest edition of "Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings."

### **9.6**

All staff should be aware that they are vulnerable to allegations and that maintaining professional boundaries, appropriate relationships, and clear conduct is essential to safeguarding both children and staff.

### **9.7 Whistleblowing**

Children cannot be expected to raise concerns in an environment where adults do not do so themselves. All staff have a duty to raise concerns about unsafe practice, misconduct, or safeguarding failures. Staff should use Onside Education's whistleblowing policy or may seek external advice via the NSPCC Whistleblowing Helpline.

## **10. Local Arrangements and Useful Contacts**

### **10.1 Onside Education Safeguarding Arrangements**

Onside Education has specific local arrangements for safeguarding, including key staff members with safeguarding responsibilities. These staff members are clearly identified within the each provision's individual policies. The key contacts are as follows:

- CEO: Christian Brown
- Director of Alternative Provision: Adam Gray
- Central Strategic Safeguarding Lead: Adam Gray
- Head of Provision: Adam Gray
- Provision Safeguarding Lead (DSL): Lucy Brennan
- Deputy DSL: Lauren Johnstone
- Mental Health Lead: Charlotte Dempsey
- Attendance Lead Officer: Ellis Tonks
- Designated Teacher for Looked After Children: Adam Gray

### **10.2 Individual School Policy**

Each Provision's policy will include specific contact details and referral processes for safeguarding procedures in alignment with the local safeguarding board.

## 11. Useful Contacts for Onside Education:

### Child protection / safeguarding referrals (Staffordshire)

- Staffordshire Children's Advice and Support (SCAS): 0300 111 8007 (Option 1) [staffsscp.org.uk](http://staffsscp.org.uk)+2 [Staffordshire Connects+2](#)
- Out of hours (Emergency Duty Service): 0345 604 2886  
[Staffordshire Connects+1](#)
- Staffordshire Safeguarding Children Partnership "Concerned about a child" pages confirm SCAS as the route.  
[staffsscp.org.uk](http://staffsscp.org.uk)+1

### LADO (Staffordshire)

- Staffordshire LADO email: [staffordshire.lado@staffordshire.gov.uk](mailto:staffordshire.lado@staffordshire.gov.uk)  
[Staffordshire County Council+1](#)

### Prevent (Staffordshire)

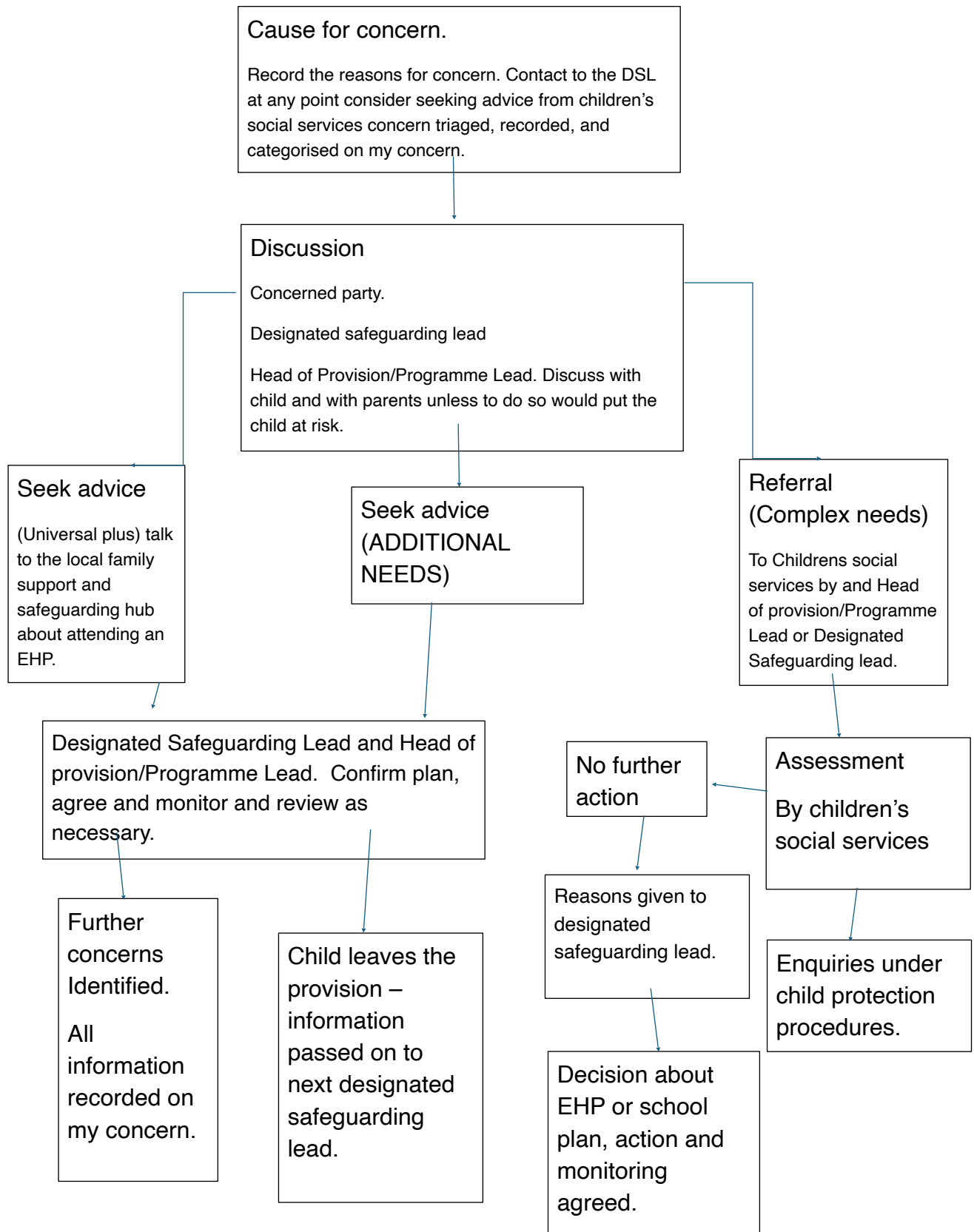
- Staffordshire Prevent page: Police 101 / emergency 999 / National Police Prevent advice line 0800 011 3764 [Staffordshire County Council+1](#)

### Police

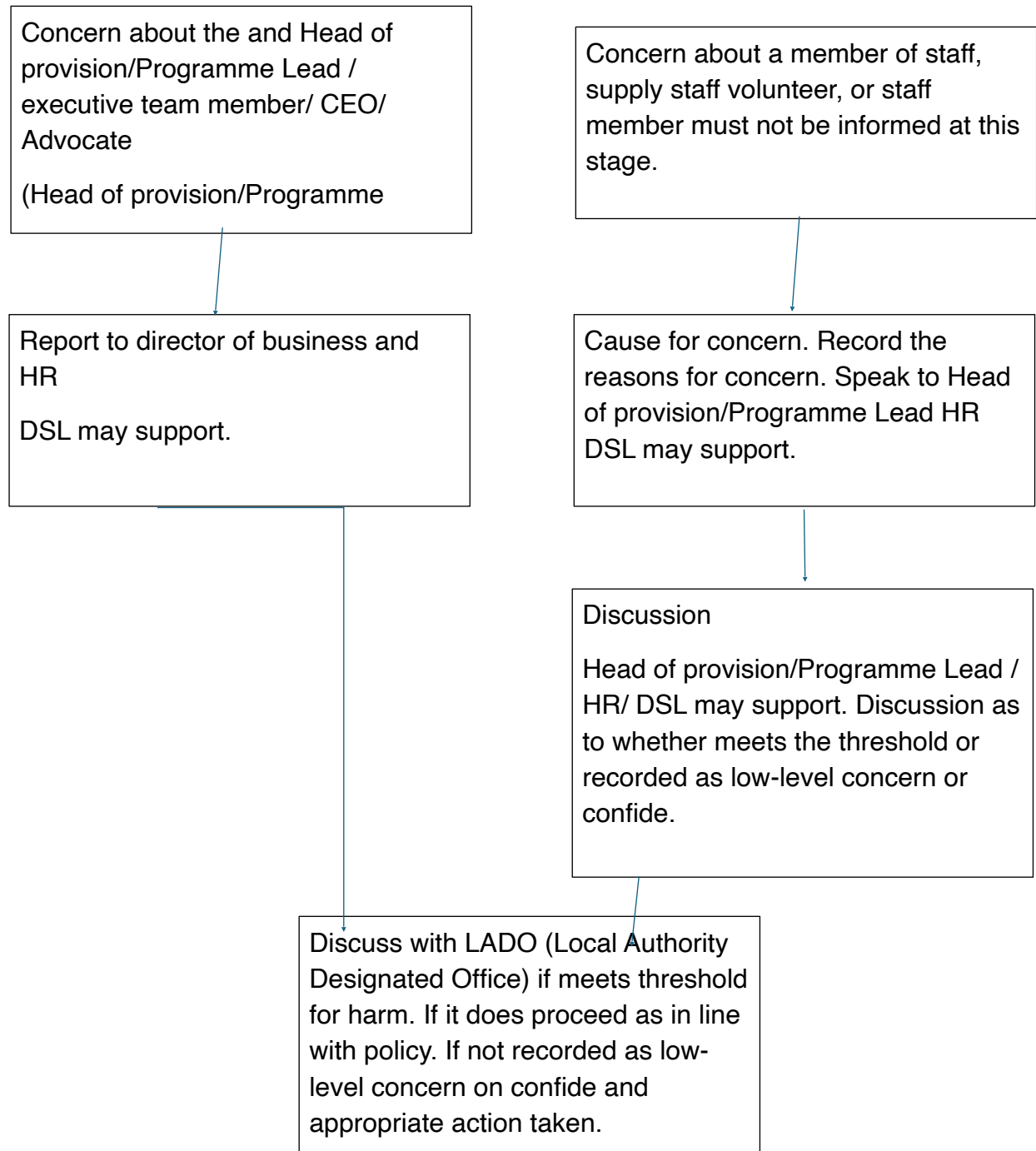
- Non-emergency: **101**
- Emergency: **999**

## Appendix One: Key Procedures – Responding to concerns about a child.

### If the child is in immediate danger phone 999



**Appendix Two: Responding to concerns about a staff member, volunteer or supply teacher flowchart. The use of this flowchart includes low-level concerns.**



Appendix Three:

## **Child-on-Child Sexual Violence and Sexual Harassment**

Guiding Principles

### **1.1**

These procedures must be read and applied alongside Onside Education's Behaviour Policy and Anti-Bullying Policy, and in accordance with Keeping Children Safe in Education (KCSIE) 2025.

### **1.2**

All staff are expected to adopt an attitude of "it could happen here" and to recognise that sexual abuse, sexual harassment and harmful sexual behaviour (HSB) may already be occurring but not yet disclosed. Staff must never assume that such behaviour does not happen within their provision.

### **1.3**

Sexual violence, sexual harassment and harmful sexual behaviour can occur between children of any age and sex, including as part of group behaviours, peer pressure or coercion.

### **1.4**

Onside Education recognises that sexual violence and sexual harassment exist on a continuum of behaviour and may overlap. All incidents, regardless of perceived severity, will be taken seriously and responded to appropriately.

### **1.5**

Child-on-child sexual violence and harassment can occur within the provision, in the wider community or online. Such behaviour can have a significant and lasting impact on a child's emotional health, wellbeing, safety and ability to engage in education.

### **1.6**

All reports, disclosures or suspected incidents of sexual violence or sexual harassment must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL, in line with Part One of KCSIE 2025. Staff must not investigate concerns themselves.

### **1.7**

Onside Education maintains a zero-tolerance approach to sexual violence and sexual harassment. This behaviour is never acceptable and will not be normalised, tolerated or dismissed as “banter”. Staff must challenge and address sexualised, sexist, misogynistic or homophobic language and behaviours consistently and appropriately.

### **1.8**

Onside Education acknowledges the prevalence of sexual harassment and abuse in society and is committed to early identification, robust response and ongoing support. We are dedicated to promoting equality, dignity and respect and to fostering a safe and inclusive culture for all children.

### **1.9**

The gendered nature of sexual harassment and sexual violence is recognised, with evidence indicating that girls are more likely to be victims and boys more likely to be perpetrators. However, boys, transgender students, children with SEND and other vulnerable groups may also be at increased risk and less likely to disclose concerns. All children will be safeguarded equally.

### **1.10**

Onside Education will respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including incidents that occur outside of the provision or online. Victims will be reassured that they are being taken seriously, supported appropriately and kept safe.

## Definitions

Sexual abuse encompasses a range of behaviours as defined below:

### **2.1 Sexual Violence – Defined by the Sexual Offences Act 2003:**

- Rape: A person (A) commits rape if they intentionally penetrate the vagina, anus, or mouth of another person (B) with their penis, B does not consent, and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offense if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent, and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offense if they intentionally touch another person (B), the touching is sexual, B does not consent, and A does not reasonably believe that B consents.
- Causing someone to engage in sexual activity without consent: A person (A) commits an offense if they intentionally cause another person (B) to engage in a sexual activity, B does not consent, and A does not reasonably believe that B consents.

We note that:

- A child under 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.

Onside Education emphasises teaching all children about consent through our PSHE programme.

### **2.2 Sexual Harassment – 'Unwanted conduct of a sexual nature' that can occur online and offline, likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated, creating a hostile environment. It can include:**

- Sexual comments, such as lewd remarks about clothes and appearance, and calling someone sexualised names.
- Sexual “jokes” or taunting
- Physical behaviour, such as deliberate brushing against someone, interfering with someone’s clothes, and displaying sexual pictures or drawings
- Online sexual harassment, including non-consensual sharing of sexual images and videos (often referred to as sexting), sharing unwanted explicit content, sexualised online bullying, inappropriate sexual comments on social

media, exploitation, coercion, and threats. Online sexual harassment may be part of a wider pattern of sexual harassment and/or violence.

Onside Education acknowledges the prevalence of sexual harassment as identified in Ofsted's Sexual Abuse Review (2021) and is committed to ensuring students know the importance of speaking up against it.

2.3 Harmful Sexual Behaviour (HSB) – Encompasses a spectrum from developmentally normal to problematic behaviours, which can range from inappropriate to violent. The school is committed to staying informed about behaviours classified as HSB and ensuring staff have the necessary training and resources to respond appropriately. HSB from young people may not always be intentional or aimed to harm others and can include:

- Inappropriate sexual language
- Inappropriate role play
- Sexual touching
- Sexual assault/abuse
- Sexting

Onside Education recognises that HSB can be distressing for both the instigator and the victim and is committed to addressing it effectively.

### **3. Responding to reports and concerns of sexual violence and/or sexual harassment between children**

3.1 We have covered above what we do when responding to child-on-child abuse concerns/disclosures. These processes all apply to cases of sexual violence and sexual harassment. However, we recognise the complexity and challenges that we face with cases of sexual violence and sexual harassment.

3.2 The statutory guidance does not attempt to provide (nor would it be possible to provide) detailed advice on what we should do in any or every case; it provides effective safeguarding practice and principles for us to consider in our decision-making process and on a case-by-case basis.

3.3 We understand that our initial response to a report can encourage or undermine the confidence of the victim. The culture in our setting is key to ensuring that we get

the initial response right. We are also committed to reflecting on and learning from issues we deal with.

3.4 In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed. A child's own behaviour might indicate that something is wrong. As per the guidance above, staff should act immediately if they have any concerns about a child's welfare, rather than wait to be told.

3.5 On occasions the victim may not wish for their identity to be known. There are no easy or definitive answers when this is requested. If the victim does not give consent to share information, we may still lawfully share it, if it can be justified to be in the public interest; for example, to protect children from harm and promote the welfare of children.

3.6 A student is likely to disclose to someone they trust: this could be anyone on the school or college staff or even a visitor to school. Therefore, all staff will be trained to manage reports of sexual violence and sexual harassment. We will ensure that visitors to school know how to report any concerns.

3.7 When dealing with disclosures of sexual violence and sexual harassment, staff at Onside Education will:

- take any disclosure seriously
  - listen carefully and use the child's language in reflecting back what has been shared
  - reassure and be non-judgemental
  - devote their full attention to the child
  - handle the situation with sensitivity
  - ask open and non-leading questions
  - only prompt when necessary with open questions: where, what, when etc.
  - be clear about boundaries and next steps
  - use proper names for body parts but record exactly any language or vocabulary used by the child
  - ascertain where the abuse occurred as this may highlight 'hot spots' or vulnerable locations in our schools or the community, which may need to be revisited by either ourselves (in school) or by alerting police/partners 32
  - ascertain whether other children witnessed this abuse
  - wait until the end of the report and immediately write up a thorough summary
  - record the facts only as the child has reported them
  - inform the DSL as soon as practically possible
  - only share the report with those people necessary in order to progress it
- Staff at Onside Education will not:

- make children feel ashamed or that they are creating a problem by reporting a concern or making a disclosure
- promise confidentiality. It is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or a deputy) or local authority children's social care) to decide next steps.
- ask leading questions
- insert their own opinion or any form of supposition into the report
- view or forward illegal images of a child. Staff should always seek the advice of the DSL and/or trust safeguarding lead and/or police when necessary.

3.8 Our DSL (onsite) will take the lead role when dealing with this type of abuse, using their professional judgement and knowledge of working together practices. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. It is important to maintain a calm, considered and appropriate response to any reports. No one should feel alone when faced with cases of sexual violence and sexual harassment. DSLs have the further support of hub safeguarding lead, and specific expertise in harmful sexual behaviour in our trust safeguarding leads to call upon if need be.

3.9 The DSL will consider the following:

- the wishes of the victim in terms of how they want to proceed
- how to ensure that the victim is given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered - we will balance this aspect and the need to balance our duty and responsibility to protect other children
- the nature of the alleged incident(s) including whether a crime may have been committed and consideration of any display of harmful sexual behaviour
- the ages of the students involved
- the developmental stages of the students involved
- whether there is a power imbalance between the students (e.g., Is the perpetrator older? Does the victim have a disability or learning difficulty?)
- whether the alleged incident is a one off or a sustained pattern of abuse
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- whether there are ongoing risks to the victim, other children, adult students, or staff
- other related issues and wider context, including links to any forms of child exploitation.

3.9 Parents or carers of the victim will be informed (unless this would put the victim at greater risk). Rape, assault by penetration and sexual assaults are crimes and the DSL will have to balance the wishes of the victim against their duty to protect the

child who has harmed and other children within the school setting. If we decide to make a referral to children's social care and/or a report to the police against the wishes of victim, this will be handled extremely carefully.

The reasons will in most cases be explained to the victim and appropriate specialist support offered. If a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.

3.10 Onside Education will give all the necessary support for the victim to remain in school; however, if the trauma results in the child who has been harmed being unable to remain in school, alternative provision or a move to another school or college will be considered to enable them to continue to receive suitable education. This will only be at the request of the victim (and following discussion with their parents or carers).

3.11 When we speak to the alleged perpetrator we will:

- listen to what they say and not dismiss their account
- handle the situation with sensitivity
- offer ongoing support
- record all conversations and all action taken
- consider any referrals for external support.

Onside Education will carefully consider when to inform the alleged perpetrator of the allegation. When a report is going to be made to children's social care and/or the police, then, as a rule, we will seek advice as to the next steps.

#### **4. Scenario considerations**

There are four likely scenarios we will need to consider when managing any reports of sexual violence and/or sexual harassment:

- a) Manage internally - In some cases of sexual harassment (for example, one-off incidents), we may take the view that the students concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally using our own sanctions in line with the school's behaviour policy and by providing pastoral intervention and support.
- b) Early help. We may decide that the children involved do not require statutory interventions but may benefit from early help where we are the lead professional.
- c) Reporting to the police - see below.

d) Referral to children's social care - see below.

## **5. Reporting to the Police**

5.1 At Onside Education we understand our responsibility to report certain forms of child-on-child abuse (see below) to the police. We must record the rationale behind any decision to inform or not inform the police.

5.2 If we suspect that an offence has been committed, a report may be made to the police. When a report is made to the police, we will consult with the police and agree what information is appropriate to disclose to staff and others, in particular the alleged perpetrator and their parents or carers. We will also discuss the best way to protect the victim and their anonymity.

5.3 This may also include the development of a clear and robust safety and support plan as part of this early help process. Risk assessing, and safety planning is a key aspect in managing cases child-on-child abuse (see Post Incident Management section 10).

5.4 When there is a report of a rape, assault by penetration or sexual assault, the starting point is that this should be passed to the police who will advise and log according to their own guidelines.

5.5 Additional guidance can be found in 'When to call the police (guidance for schools and colleges)' 2 and Outcome 21 Sexting guidance3 .

5.6 We will ask the police if we have any questions about the progress of the matter for example, are there any bail conditions in place or has there been a charging decision. It is key to have a central point of contact with the police for updates and progress. When required, advice from the police will be sought to help us to manage our safeguarding responsibilities. When bail is deemed proportionate and necessary, as above, we will work with children's social care and the police to manage any implications and safeguard our children.

## **6. Referring to children's social care**

6.1 In all cases of child-on-child abuse that include sexual violence and sexual harassment, we will consider whether the incident should be reported to 2 <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publicationslog/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf> 3

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/578979/GD8\\_-\\_Sexting\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/578979/GD8_-_Sexting_Guidance.pdf) 35 children's social care.

We must consider whether a child is at risk of harm or is in immediate danger. Again, the rationale behind any decision to refer or not refer must be recorded on the incident form.

6.2 In some cases, children's social care will review the evidence and decide that a statutory intervention is not appropriate, and, in these circumstances, we will consider other support mechanisms, such as early help, specialist support/referrals and pastoral support as part of a formalised plan. We will consider starting an early help process where we are the lead professional.

6.3 However, if the DSL/DDSL feels that the child remains in immediate danger or at risk of harm, they may refer again.

6.4 At this referral stage, we will inform parents or carers, unless there are compelling reasons not to (e.g., when informing a parent or carer is going to put the child at additional risk). Any such decision will be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved need protection or other services.

6.5 When statutory assessments are appropriate, we will work alongside, and cooperate with, the relevant lead social worker.

6.6 We will not wait for the outcome or even the start of a children's social care investigation before protecting the victim and other children in the school. It will be important for us to work closely with children's social care (and other agencies as required) to ensure that any actions we take do not jeopardise a statutory investigation.

## **7 Working with our parents and carers**

7.1 At Onside Education we will, in most instances, engage with both the parents of both the victim and the alleged perpetrator when there has been a report of child-on-child abuse including sexual or sexual harassment. The exception to this rule is if there is a reason to believe that informing a parent or carer will put a child at additional risk.

7.2 We will carefully consider what information is provided to the respective parents or carers about other children involved, and when to do so.

7.3 In some cases, children's social care and/or the police will have a very clear view on this aspect, and it will be important for us to work with relevant agencies to ensure a consistent approach is taken to information sharing.

7.4 It should be the case that we will meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

7.5 It is also likely that we will meet with the alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact the alleged perpetrator, such as, for example, moving them out of classes they share with the victim and what this means for their education.

7.6 We will be clear and transparent and explain the reason behind any decisions. Support for the alleged perpetrator will be discussed including any referrals, if appropriate.

7.7 We realise that parents and carers may well struggle to cope with a report that their child has been the victim of sexual abuse, or has abused another child. Details of organisations that support parents are provided on the school website and at the end of this policy.

## **8. Sanctions**

8.1 Sanctions will be determined on a case-by-case basis in line with the school's behaviour policy. When appropriate, and taking into account the victim's wishes, we will use restorative approaches to resolve conflict. However, this may not always be suitable.

8.2 If there is police involvement, we will collaborate closely to ensure that disciplinary actions do not interfere with the police investigation.

8.3 Imposing a sanction does not preclude us from supporting the alleged perpetrator, as they may also be victims of abuse.

## **9. Post-Incident Management**

9.1 It is crucial to provide appropriate and ongoing support for all children involved in child-on-child abuse for as long as needed. This may include referrals to external agencies/professionals, decided in consultation with the children, their parents/carers, and other professionals.

9.2 We will coordinate with other professionals involved to ensure cohesive support and mutual understanding of each other's roles.

9.3 Delays may occur in cases progressing through the criminal justice system. Nonetheless, we will not wait for the police investigation's outcome to protect the victim, alleged perpetrator, and other students, moving forward with our post-incident management.

9.4 Post-incident, it is imperative to continue supporting the involved children, even if they appear to be coping. We will ensure they do not engage in harmful behaviour towards others or themselves, such as self-harm. Regular reviews with the young people involved will be part of the plan.

9.5 While referrals may have already been made, it is important to establish which professionals continue to work with all involved children, supported by robust planning.

## **10. Safety Planning/Risk Assessment**

10.1 Robust safety planning and risk assessment are integral to post-incident management. For reports of sexual violence, the DSL or DDSL will conduct an immediate risk and needs assessment. For reports of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

10.2 When creating a risk assessment, we will consider:

- Ensuring the victim can continue their normal routine, including education.
- Ensuring the alleged perpetrator can access education and support.
- Whether the victim and alleged perpetrator share classes.
- Measures needed during transitions between lessons/classes.
- Measures needed for unstructured times (breaks and lunchtimes).
- Measures needed for arrival and departure from school.
- Whether the victim and alleged perpetrator use the same transport to and from school.
- Appropriate information sharing with staff to ensure the plan is manageable and successful.
- Informing the new educational institution of any ongoing support needs if the alleged perpetrator is moved.

10.3 We will document our decision-making and rationale on the incident report forms.

10.4 All risk assessments will be regularly reviewed. We will assess and mitigate any risks posed to other students.

10.5 The DSL or DDSL will liaise with children's social care and specialist services as needed. Professional risk assessments by social workers or sexual violence specialists may be required and will inform our approach.

10.6 Safety and support planning/risk assessments should be considered in all cases of child-on-child abuse, not just sexual violence and harassment. A proportionate risk assessment must be in place for sexual violence and harassment, in line with Keeping Children Safe in Education 2025.

## **11. Unsubstantiated, Unfounded, False, or Malicious Reports**

11.1 All concerns, discussions, decisions made, and their reasons should be recorded in writing. Records should be reviewed to identify and address patterns of concerning behaviour.

11.2 If a report is found to be unsubstantiated, unfounded, false, or malicious, the DSL should consider whether the child or person making the allegation needs help or may have been abused by someone else. A referral to local authority children's social care may be appropriate.

11.3 If a report is determined to be deliberately invented or malicious, the school will consider appropriate disciplinary action against the individual who made it, as per the behaviour policy.

## **12. Supporting All Students**

12.1 Onside Education will support all students affected by reports of sexual harassment or violence. We will ensure that victims, alleged perpetrators, and any witnesses are not bullied or harassed, including online. Students will be Educated about the dangers of social media in these contexts and directed to specialist support when necessary.

12.2 Onside Education maintains a zero-tolerance approach to sexual violence and harassment. Such behaviour is never acceptable and will not be tolerated. We aim to create an environment where all children support and respect their peers when reports of sexual violence or harassment are made.

12.3 This guidance will be kept under review to reflect on its effectiveness in responding to reports of sexual harassment or violence and to address emerging issues or trends. Relevant information will be shared with safeguarding partners as appropriate.

#### **Appendix Four: Acronyms used within the policy.**

CASS- Child Advice and Support Service

CCE-Child Criminal Exploitation

CME-Children Missing Education

CSE-Child Sexual Exploitation

CTU-Counter Terrorism Unit

DBS- Disclosure Barring Service

DDSL -Deputy Designated Safeguarding Lead DfE- Department for Education

DSL-Designated Safeguarding Lead EHP- Early Help Plan EYFS – Early Years Foundation Stage

FGM- Female Genital Mutilation

GDPR –General Data Protection Regulations

IT - Information Technology

LAC-Looked After Child

LADO- Local Authority Designated Officer

NSPCC-National Society for the Protection Cruelty to Children RHRT-Right Help Right Time

RSE- Relationship and Sex Education

SCR- Single Central Record

SEND -Special Educational Needs and Disability

SPOC- Single Point of Contact

SSCB-Staffordshire Safeguarding Children Board

UKCIS UK Council for Internet Safety

Definitions of key terms used in this policy can be found in the relevant section of Keeping Children Safe in Education 2025

#### **Appendix Five: The Police and Criminal Evidence Act (1984) – Code C 1.**

The head of provision/programme lead, designated safeguarding lead (DSL) and deputy (DDSL) are aware of the requirement for children to have an appropriate adult when in contact with Police officers.

2. PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for these purposes.

3. PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

4. If a police officer arrives at the school wishing to speak with a student, the receptionist will inform the head of provision/programme lead and the DSL and follow the school's visitor procedures. The DSL will ensure that arrangements are made to inform parents that this is the case and seek their presence at the school as the appropriate adult. If for any reason the parent cannot attend to be an appropriate adult the DSL or head of provision/programme lead will ensure that an appropriate adult is provided from the school team.

5. The DSL (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a student about an offence they may suspect. This communication will be recorded on our online safeguarding system.

6. If having been informed of the vulnerabilities, the DSL (or deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns immediately.

7. A person whom there are grounds to suspect of an offence must be cautioned\* before questioned about an offence\*, or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

8. A Police Officer must not caution a child or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

9. The 'appropriate adult' means, in the case of a child:

- the parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.

- a social worker of a local authority or, failing these, some other responsible adult aged 18 or over who is not:
  - a police officer • employed by the police.
  - under the direction or control of the chief officer of a police force;
  - a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance - PACE Code C 2019.

1 The police caution is: "You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."

2 A person need not be cautioned if questions are for other necessary purposes, e.g. (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

## **Appendix Six: Lead contacts for safeguarding within Onside Education**

(to be updated periodically to reflect changes)

### **Central safeguarding Team:**

Strategic Safeguarding Lead (organisation-wide oversight): Adam Gray

Central DSL (support, quality assurance and escalation): Adam Gray

Deputy Central DSL: Lauren Johnstone

Mental Health Lead: Charlotte Dempsey

Designated Teacher for Looked After Children (central oversight): Adam Gray

Prevent Lead (Strategic / Escalation): Christian Brown

### **Safeguarding Contacts – Onside Education Tamworth (Staffordshire)**

- Proprietor / Responsible Body: U-Educate
- Strategic Safeguarding Oversight: Adam Gray
- On-site Designated Safeguarding Lead (DSL): Lucy Brennan
- Deputy DSL: Lauren Johnstone
- Prevent SPOC (normally DSL): Lucy Brennan
- Mental Health Lead: Ellis Tonks
- Attendance Lead Officer: Ellis Tonks

## **Appendix Seven: Additional support and guidance**

### **Statutory / core safeguarding guidance**

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023

### **Safeguarding practice and response**

- Information sharing: advice for practitioners providing safeguarding services
- Children missing education (statutory guidance) [GOV.UK](#)
- Mental health and behaviour in schools (DfE guidance) [GOV.UK](#)
- Searching, screening and confiscation (DfE guidance) [GOV.UK](#)
- Behaviour in schools (DfE guidance) [GOV.UK](#)

### **Peer-on-peer / sexual violence & harassment / RSHE**

- Ofsted: Review of sexual abuse in schools and colleges (April 2021)
- Relationships education, relationships and sex education (RSE) and health education (DfE guidance)
- Sharing nudes and semi-nudes: advice for education settings [UK Safer Internet Centre](#)
- Marie Collins Foundation (support and resources on online harm and child sexual abuse)

### **Bullying and online safety**

- Preventing and tackling bullying (DfE guidance) [GOV.UK](#)
- UK Safer Internet Centre (including Professionals Online Safety Helpline)
- Internet Watch Foundation (report harmful/illegal online content)
- Thinkuknow (NCA/CEOP online safety education)

### **Exploitation / contextual safeguarding**

- County Lines Toolkit for Professionals (The Children's Society)

- Harmful Sexual Behaviour Support Service (SWGfL)
- CSA Centre (practice improvement resources)

**Whistleblowing / advice lines**

- NSPCC Helpline (general safeguarding advice)
- NSPCC Whistleblowing Helpline (concerns about how safeguarding is handled)