

# Child Protection and Safeguarding

Seven Springs Education



**Seven Springs  
Education**

<b>Approved by:</b>	Willow Hewitt	<b>Date:</b> 7/9/23
<b>Last reviewed on:</b>	7/9/23	
<b>Next review due by:</b>	6/9/24	

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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Willow Hewitt	<a href="mailto:willow@seven-springs.co.uk">willow@seven-springs.co.uk</a> <a href="mailto:DSLteam@seven-springs.co.uk">DSLteam@seven-springs.co.uk</a>

		07392013379 (out-of-hours)
Deputy DSL	Joyce Wong	<a href="mailto:joyce@seven-springs.co.uk">joyce@seven-springs.co.uk</a>
Alternative contact when DSL and Deputy DSL are unavailable Designated mental health lead (DMHL)	Ceri Moss	<a href="mailto:ceri@seven-springs.co.uk">ceri@seven-springs.co.uk</a> <a href="mailto:DMHLteam@seven-springs.co.uk">DMHLteam@seven-springs.co.uk</a>
NSPCC helpline		0808 800 5000
Reporting Child Abuse to a Local Council		<a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>
Channel helpline		020 7340 7264 <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>
Confidential anti-terrorist hotline		0800 789 321
Forced Marriage Unit		020 7008 0151 <a href="mailto:fm@fco.gov.uk">fm@fco.gov.uk</a>

## 1. Aims

Seven Springs Education aims to ensure that:

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

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#).

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#)
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

### 3. Definitions

**Safeguarding and promoting the welfare of children means:**

- Protecting children from maltreatment
- Preventing impairment of children’s health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**Children** includes everyone under the age of 18.

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

### 4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and people working at Seven Springs Education and is consistent with the procedures set by the 3 safeguarding partners.

### 5.1 All staff

All staff will read and understand part 1 (unless specifically told to read Annex A instead) of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the online safety policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- How to contact our DSL who will liaise with the child's school. The child's school will make a further referral to the relevant local authority children's social care and may conduct statutory assessments that may follow a referral
- The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe. They should know how to maintain an appropriate level of confidentiality while also not promising a child that they won't tell anyone else about the report
- The fact that children may not always be aware that they are being abused, neglected or exploited and that this should not prevent staff from contacting the DSL about their concerns
- The fact that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

### 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Willow Hewitt. The DSL takes lead responsibility for child protection and wider safeguarding at Seven Springs Education.

The DSL will be available during working hours for staff to discuss any safeguarding concerns.

The DSL may be contacted out of working hours if necessary on 07392013379.

When the DSL is absent, the deputy – Joyce Wong – will act as cover.

If the DSL and deputy are not available, Ceri Moss will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- refer cases to the [Channel programme](#) where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the police as required.
- act as a point of contact with schools and colleges and their three safeguarding partners;
- liaise with the headteacher or principal of schools and colleges to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations (this includes being aware of the requirement for children to have an Appropriate Adult - further information can be found in the Statutory guidance - [PACE Code C 2019](#));
- confirm to schools and colleges that all processes and procedures with regard to safeguarding and safer recruitment are in place and adhered to;
- as required, liaise with the case manager and the local authority designated officer(s) (LADO) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with schools and colleges on matters of safety and safeguarding (including online and digital safety and regarding concerns linked to mental health) and when deciding whether to make a referral to relevant agencies; and
- act as a source of support, advice and expertise for all staff.
- ensure the child protection policies and procedures are known, understood and used appropriately;
- ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the company in this; and
- make sure staff are aware of any training opportunities and the latest policies on safeguarding arrangements.
- help promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children in need, including children with a social worker, are experiencing or have experienced, with teaching and the leadership staff.
- Carry out safeguarding spot checks a minimum of 1 session per quarter per tutor and, detailing any safeguarding concerns raised and actions in line with our safeguarding reporting processes.

The DSL will liaise with the child's school, who shall also liaise with their local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputy are set out in their [job description](#).

### **5.3 The designated mental health lead (DMHL)**

The DMHL is a member of the senior leadership team. Our DMHL is Ceri Moss. The DMHL takes lead responsibility for the mental health and wellbeing approach at Seven Springs Education.

Seven Springs Education has chosen to appoint a DMHL in line with the recommendations of [Transforming children and young people's mental health provision, 2018](#).

The DMHL will be available during working hours for staff to discuss any mental health or wellbeing concerns which do not present an immediate safeguarding concern. In instances when a child is suffering or likely to suffer harm, or is in immediate danger, please follow the safeguarding reporting procedure.

It is best practice for staff to contact both the DMHL and DSL to discuss any mental health or wellbeing concerns to ensure all parties hold a full picture of a student or situation.

The DMHL will be given the time, funding, training, resources and support to:

- Coordinate the setting's provision for students' mental health needs
- Provide advice and support to other staff on mental health and wellbeing matters
- Embed mental health and wellbeing considerations across the organisation

The DMHL will liaise, where appropriate, with the DSL in referring concerns to the child's parents/carers and/or school and subsequent liaison with relevant bodies (e.g. Children and Young People's Mental Health Services, local authority children's social care, and/or police).

The full responsibilities of the DMHL are set out in their [job description](#).

## 5.4 The Senior Leadership Team

The Senior Leadership Team is responsible for reviewing and approving this policy. The Senior Leadership Team is also responsible for the implementation of this policy with the support of the DSL, including:

- Ensuring that all staff are informed of our systems which support safeguarding, including this policy, as part of their induction
- Ensuring that all staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Facilitating a whole-organisation approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Communicating this policy to schools or parents/carers when a child joins Seven Springs Education and via the Seven Springs Education website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable

## 6. Confidentiality

Seven Springs Education respects confidentiality and data protection legislation. We understand the need to protect sensitive and confidential personal data and we only ever share data for child protection and safeguarding reasons. Where there is concern, we will share information with the child's school, safeguarding partners and other agencies, where relevant, in accordance with data protection legislation and safeguarding legislation and guidance.

All staff should note that:

- Timely information sharing is essential to effective safeguarding

- 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
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, you should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

Please see Appendix 1 for indicators of abuse and neglect.

All staff must follow the procedures set out below in the event of a safeguarding issue.

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

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly. The DSL will inform the relevant child's school's DSL, who will follow their local procedures as put in place by their 3 safeguarding partners.

You may find the contact details for reporting child abuse to the local council using the GOV.UK webpage: <https://www.gov.uk/report-child-abuse-to-local-council>

In an emergency or if the child is in immediate danger, call 999, otherwise call 111 to contact the police.

### 7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions. Allow the child to lead the conversation and do not 'put words in their mouths'.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret .

- Write up your conversation as soon as possible in the child's own words. You can use the same language and terms or include quote marks to record the child's account. Stick to the facts, and do not put your own judgement on it and do not include your opinions.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

If the child's school is involved in tuition provision, the DSL will immediately pass on information to the school's DSL or child protection lead. The school shall follow their school procedure for reporting to the Local Authority or other relevant authorities. Seven Springs Education shall support the school with any action that the school deems appropriate and shall undertake reasonable endeavours to provide the school with any assistance or documents.

If the students' school is not involved in tuition provision, the DSL will review all information received from tutors or staff members and make a decision on the most suitable response. Their response may include passing on information to the police, child protective services, the NSPCC and/or, if it will not put the child in danger, the child's parents, carers or guardians.

Seven Springs Education staff shall not, under any circumstances, undertake any independent investigation or questioning unless or until Seven Springs Education is given authorisation by the school or the authorities. Following authorisation, Seven Springs Education may independently follow up on allegations.

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

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

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

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

If staff suspect a child is at risk of undergoing or has undergone FGM, they should follow the mandatory FGM reporting processes (see diagrams on pages 53 and 54).

Any tutor or staff member who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. **This is a mandatory statutory duty, tutors will face disciplinary sanctions for failing to meet it.**

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL.

If in Wales, teachers/tutors who identify cases of FGM need to make a report to both the police and the relevant local authority.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL immediately. The DSL will inform the school's DSL and/or social care lead who will follow their local safeguarding procedures.

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

**Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **age 18 or over** appears to have been a victim of FGM must speak to the DSL immediately.

The DSL shall contact the police on 999 if there is an immediate risk, otherwise 101, inform the child's school's DSL and report it to the children's social care team at their local council. The school will also follow their local safeguarding procedures.

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

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to the relevant local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

### **Early help**

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Staff should report all students who may benefit from early help to the DSL.

If early help is appropriate, the DSL will lead on liaising with other Seven Springs Education team members, other agencies, such as the child's school, and setting up an inter-agency assessment as appropriate.

Staff may be required to support other Seven Springs Education team members, other agencies and professionals in an early help assessment. Any such cases will be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

### **Referral**

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL must follow up with the child's school, who shall follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

## **7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. The DSL will also liaise with the child's school's DSL.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek relevant advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL and the child's school DSL will consider the level of risk together 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.

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

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

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

## 7.6 If you have a mental health concern

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DMHL **and** the DSL to agree on a course of action.

For more information regarding mental health and wellbeing, refer to Appendix 6: mental health and wellbeing policy.

## 7.7 Concerns about a staff member

Concerns could include allegations that a current or former member of staff, at any level of seniority, has:

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

If you have concerns about a member of staff, or an allegation is made about a member of staff posing a risk of harm to children, speak to the DSL. If the concerns/allegations are about the DSL, speak to a member of the Senior Leadership Team or the Managing Director.

Seven Springs Education will always deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. We will deal with all allegations as quickly and effectively as possible.

A 'case manager' will lead any investigation. This will be the DSL or a member of the Senior Leadership Team where the DSL is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If you believe there is a conflict of interest in reporting a concern or allegation about a member of staff to the Senior Leadership Team, report it directly to the relevant local authority designated officer (LADO).

The member of the Senior Leadership Team will then follow the procedures set out in appendix 3, if appropriate.

## **7.8 Allegations of abuse made against other students**

We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. All staff should report any concern, and it is essential not to establish a hierarchy of concerns and dismiss harmful behaviours as low level or explain them away as "banter". All low level concerns should be reported to the DSL in line with reporting procedure, taken seriously and acted on, no matter how minor the behaviour may seem.

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

Some cases of students hurting other students will be dealt with under our Seven Springs Education behaviour policy, but this Child Protection and Safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

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

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

Seven Springs Education is committed to working with other agencies, such as schools, the police, local authorities, the NSPCC and other agencies. Children's parents, carers and guardians may also be informed if this does not post harm to the children involved.

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will assess the situation and make a judgement on the most suitable line of response.
- Where deemed appropriate, the DSL will contact the child's school and/or local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- Where deemed appropriate, the school's DSL will put a personalised safeguarding risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- Where deemed appropriate, the school's DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

- Where deemed appropriate, the DSL will support the school with any action that the school deems appropriate and shall undertake reasonable endeavours to provide the school with any assistance or documents

### **Creating a supportive environment and minimising the risk of child-on-child abuse**

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders
- Model appropriate behaviour and consent to students at all times
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a student harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns

## **7.9 Sharing of nudes and semi-nudes (‘sexting’)**

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident, and reassure the student(s) that they will receive support from Seven Springs Education's DSL and, where appropriate, from other agencies. If appropriate, the DSL will inform other agencies, such as the child's school, the police, the NSPCC, the child's local authority, who can provide assistance to the child.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with relevant staff and members, this may include the school's DSL lead and the member of staff who reported the incident. This meeting will consider the initial evidence and aim to determine:

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

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

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

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

### **Further review by the DSL**

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

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

### **Informing parents**

The DSL will inform the child's school immediately who shall inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialling 101 or contacting the local neighbourhood police of the child's school if known.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

## **7.10 Reporting systems for our students**

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

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

To achieve this, we have:

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

## **8. Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. See our [Online Safety Policy](#) for further details.

To address this, we aim to:

- Have robust processes in place to ensure the online safety of students and staff, including training tutors in up-to-date slang and other communication aspects to support their live monitoring, as well as conducting regular spot-checks on the communication taking place in our systems
- Protect and educate students on safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones and devices

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Support schools in the application of their filtering and monitoring processes, as well as oversee implementation on internal systems

### The 4 key categories of risk

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

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

### To meet our aims and address the risks above we will:

- Educate students about online safety through our [online safety policy](#) and [student guide](#). For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation, and highlight the importance of ongoing monitoring related to these issues. All staff members will receive refresher training at least once each academic year
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are not allowed to use their mobile phones during lessons except in emergencies
  - Staff will not take pictures or recordings of students on their personal phones or cameras
- Make all students, parents/carers and staff aware that they are expected to sign an agreement regarding the acceptable use of Seven Springs Education's platforms and services, and use of their mobile and smart technology
- Record all live Zoom lessons and save chat logs and Zoom participants data for safeguarding
- Limit communication between students in Zoom lessons by removing private chat features to other students
- Preventing students from communicating and interacting without the presence of a tutor by logging out all students from the Zoom lesson when the host is logged out (e.g. disconnected)
- Monitoring content posted on Seven Springs Education platforms and services via regular spot checks
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of mobile phones
- Put in place systems to limit children's exposure to the 4 key categories of risk (described above)

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our policy on online safety and the use of mobile phones, please refer to our online safety policy, which you can find on our website.

## 9. Notifying parents

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

Other staff will only talk to parents about any such concerns following consultation with the DSL and the school's DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the school's DSL, who shall contact their local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the schools' DSL, who shall inform parents of all the children involved. Where deemed necessary, we will notify the parents of all the children involved.

## 10. Students with special educational needs, disabilities or health issues

We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Students in this group are at higher risk and additional barriers can exist when recognising abuse and neglect, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Students being more prone to isolation or bullying (including prejudice-based bullying) than other students
- The potential for students with SEN, disabilities or certain health 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

We offer extra pastoral support for these students. This includes:

- providing one-on-one or one-on-two classes, where necessary
- providing additional training resources and information on SEND for tutors

We ensure that all reports of abuse involving children with SEND involve close liaison between the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND in a partner school.

## 11. Students with mental health difficulties

We recognise that safeguarding is part of our whole-organisation approach to mental health and wellbeing. We acknowledge the links present between mental health difficulties and safeguarding which mean that:

- Students with mental health difficulties may be at higher risk of safeguarding concerns
- Mental health difficulties commonly present as an indicator of a safeguarding concern

- Abuse, neglect and other traumatic and adverse childhood experiences can have a lasting impact throughout childhood, adolescence and into adulthood; so it is essential to be aware of how these experiences can impact students' mental health, behaviour and wellbeing

Furthermore, we acknowledge that some groups of students are at higher risk of mental health difficulties, such as:

- Students with SEND
- Looked-after and adopted children
- Children in need
- Children with a social worker
- Children in care or who have left care
- Children affected by socio-economic disadvantage
- Those exposed to contextual safeguarding risks e.g. child sexual exploitation (CSE), child criminal exploitation (CCE).

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the guidelines in this policy, including speaking to the designated safeguarding lead or a deputy.

Further details on supporting students with mental health difficulties can be found in Appendix 6: mental health and wellbeing policy.

## 12. Students with a social worker

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

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

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

- Responding to unauthorised absence or missing education, which can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation
- The provision of pastoral and/or academic support

## 13. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will request the following information from schools, where relevant:

- Relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- Details of children's social workers and relevant virtual school heads

Our DSL will work to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

## 14. Complaints and concerns about safeguarding policies

### 14.1 Complaints against staff

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

### 14.2 Other complaints

Other safeguarding-related complaints can be raised with our DSL.

### 14.3 Whistle-blowing

We have a separate [whistle-blowing policy](#) that covers concerns regarding the way we safeguard students as well as other concerns - including poor practice, or potential failures. You may refer to it for more information.

## 15. Record Keeping

We will hold records in line with our records retention schedule in our [Records Management, Retention and Disposal Policy](#).

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a student of Seven Springs Education changes schools, it is the responsibility of their former and new school's DSLs to promptly and securely forward their child protection file to us. The file should be forwarded separately from the main student file and should be kept up-to-date with information on the student.

Our safeguarding records are kept electronically in Seven Springs Education's servers. We keep these confidential and separate from student records. We retain and dispose of information as per our [Records Management, Retention and Disposal Policy](#). We share information on a need to know basis and only with relevant schools, other safeguarding partners and agencies.

In addition:

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

## 16. Training

## 16.1 All staff

All staff members undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the Seven Springs Education's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training is regularly updated and will always:

- Be integrated, aligned and considered as part of our whole safeguarding approach and wider staff training
- Take into account relevant advice from the 3 safeguarding partners
- Have regard to the [Teachers' Standards](#) to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all students

All staff, who work directly with or may come into contact with children, will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Other staff will receive appropriate training, if applicable.

## 16.2 The DSL and deputy

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

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

## 16.3 The DMHL

The DMHL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will undertake initial designated mental health lead training and seek out further opportunities to update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DMHLs, or taking time to read up on mental health and wellbeing developments).

## 16.4 Senior Leadership Team

All members of the Senior Leadership Team receive training about safeguarding to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As members of the Senior Leadership Team may be required to act as the 'case manager' in the event that an allegation of abuse is made against the DSL or other staff, they receive training in managing allegations for this purpose.

## 16.5 Recruitment – interview panels

At least one person conducting any interview for a post at Seven Springs Education will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, and Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

## 16.6 Staff who have contact with families

All staff who are privy to sensitive or personal information about children's families receive support and training on how to promote the interests of children, protect confidential information and undertake discussions about sensitive issues.

## 17. Monitoring arrangements

This policy will be reviewed annually by the DSL. At every review, it will be approved by the Senior Leadership Team.

## 18. Links with other policies

This policy links to the following policies and procedures:

- [Behaviour](#)
- [Staff code of conduct](#)
- [Complaints](#)
- [Attendance](#)
- [Online safety](#)
- [Equality, diversity and inclusion](#)
- Privacy notices (these can be viewed [on our website](#))

## Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 2: safer recruitment and DBS checks – policy and procedures

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

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

## Advertising

When advertising roles, we make clear:

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

## Application forms

Our application forms for regulated roles:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a declaration form on which applicants must declare any inclusions on any list of people barred from working with children by the Disclosure and Barring Service or Teaching Regulation Agency.
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.
- Require applicants to provide:
  - personal details, current and former names, current address and national insurance number
  - details of their present (or last) employment and reason for leaving
  - full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
  - qualifications, the awarding body and date of award
  - details of referees
  - a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

## Shortlisting

Our shortlisting process for regulated roles involves at least 2 people and:

- Considers any inconsistencies and looks for gaps in employment and reasons given for them
- Explores all potential concerns including those discovered during an online (including social media) check

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

### **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised are explored further with referees and taken up with the candidate at interview.

When seeking references we:

- Do not accept open references
- Liaise directly with named, relevant referees and verify information contained within references where needed to be certain that candidates meet all requirements for the role
- Ensure references include one from the candidate's current employer and are completed by a senior person. Where the referee is school based, we ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Request three and typically require at least two be completed prior to interview
- Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we:

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

### **Pre-appointment vetting checks**

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

### **New staff**

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

- Verify their identity (ID checks are conducted by a certified IDSP)
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. (See dedicated section below for details.)

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

## Existing staff

In certain circumstances, we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

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

## Candidates Who Have Lived or Worked Overseas policy and procedures

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children, particularly when recruiting staff who have lived or worked outside the UK. This policy has been written in line with the guidance held in [Keeping Children Safe in Education 2023](#) and [DfE guidance on recruiting teachers from overseas](#).

To mitigate risk early in the recruitment process, Seven Springs Education carries out appropriate further checks on staff who have lived or worked outside the UK. These are in addition to the required pre-employment checks carried out for all candidates as stipulated in our Safer Recruitment policy, even if the individual has never been to the UK. These measures are taken to ensure Seven Springs Education has the full picture of an individual and can consider any relevant events that occurred outside the UK when making recruitment decisions.

This policy and approach applies to any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

### Steps taken to mitigate risk

Steps are taken across the recruitment process to constantly compare information from across application stages and identify any concerns or discrepancies.

### Application stage

To flag time spent overseas at the earliest possible point and mitigate risk, our application form:

- Specifies that candidates must live in the UK at the time of appointment and must provide proof of UK address prior to appointment
- Asks about time spent overseas
- Asks about gaps in employment
- Explains that Seven Springs Education may make additional recruitment checks related to time spent abroad.

### References stage

All candidates to Seven Springs Education are required to provide contact information for references covering a minimum of the last 5 years prior to interview, meaning any concerns raised can be explored further with referees and taken up with the candidate at interview. Candidates who have worked overseas are required to provide referees covering their entire period spent overseas, or from age 16 if born overseas, in addition to employers before and after they left the UK (where this is reasonably possible).

Seven Springs Education may require candidates who have worked overseas to provide referees for the last 10 years where this is considered appropriate and necessary to build a better picture of the candidate.

### Interview stage

In line with safer recruitment best practices, at least one member of staff involved in recruitment and conducting interviews is safer recruitment trained. All candidates are probed about gaps in employment, frequent changes in employment or location history to determine the candidate's suitability to work with children. When it arises that candidates have lived or worked overseas, either through self-declaration or probing, additional questions are asked to assess risks.

For example:

- What led you to travel and/or work abroad?

- What were you doing before you travelled abroad?
- Can you explain the type of work you undertook while overseas?
- Were any of the roles you held while overseas similar to the one you've applied for at Seven Springs Education?
- It looks like you changed jobs frequently while you lived overseas, can you explain why that is?

### **Risk assessment**

Seven Springs Education completes a rigorous risk assessment for all candidates who have worked or lived overseas.

In instances where Seven Springs Education has exhausted the avenues for obtaining overseas criminal records checks for staff who have lived or worked overseas and been unable to obtain such checks, the risk assessment stands to compensate for this. Information for the risk assessment is collected throughout the recruitment process to identify risk factors and inform outcomes when making recruitment decisions. In addition, this policy further details additional appropriate checks that may be made as part of, or following, the initial risk assessment to confidently ascertain whether a candidate is suitable to work with children.

This risk assessment is completed by the recruitment panel, who have completed safer recruitment training, in collaboration with the Designated Safeguarding Lead. A template risk assessment can be found at the end of this policy.

### **Determining whether to complete additional appropriate checks on candidates with overseas experience**

In addition to the steps above, the relevant senior leadership team members (including safer recruitment lead and DSL) work to identify risks in the information about a candidate and decide what 'appropriate' further checks are needed based on these risks.

These checks could include, where available:

- Criminal records checks for overseas candidates, following [Home Office guidance](#); and for teaching positions.
- Obtaining a letter (via the candidate) of professional standing from the professional regulating authority (such as the Department/Ministry of Education) in the country (or countries) in which the candidate has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. candidates can find contact details of regulatory bodies in the EU/EEA and Switzerland on the [Regulated Professions database](#). Whilst the safeguarding and qualified teacher status (QTS) processes are different it is likely that this information will be obtained from the same place, therefore candidates can also contact the [UK Centre for Professional Qualifications](#) who will signpost them to the appropriate EEA regulatory body.

### **On overseas criminal records checks**

Seven Springs Education recognises that not all countries provide criminal record information, and where they do, the nature and detail of the information provided varies from country to country. Moreover, the criteria for disclosing offences in other countries often have a different threshold than those in the UK. Where available, this evidence is considered together with information obtained through other pre-appointment checks to help assess the candidate's suitability to work with children as part of the risk assessment.

### **Additional appropriate checks**

Where the overseas criminal records or professional standing checks above are not available, Seven Springs Education seeks appropriate alternative methods of checking the suitability of candidates. These alternative methods are recorded in the risk assessment for the candidate alongside standard pre-employment checks to form as full a picture of the candidate as possible and support informed decision making on whether to proceed with the appointment.

Following the assessment of the level of risk related to a candidate, additional checks may be carried out to help close any relevant information or confidence gaps.

For example:

- Certificates of good conduct or character references. In instances where a candidate is young and/or doesn't have much employment history, references may be sought from organisations where they've, for example: studied, completed a work placement, volunteered. The same procedures for checking the appropriateness of a reference are followed as with employment referees.
- Carrying out an online search. In line with KCSIE 2022, online social media checks are now part of the shortlisting process for all candidates.

If knowledge or confidence gaps remain following additional checks, Seven Springs Education may:

- Not proceed with the appointment
- [In cases where risk has been thoroughly assessed and discussed between the DSL and the safer recruitment-trained panel] Implement robust additional control measures to manage risk, such as:
  - An enhanced induction process (evidenced in individuals' Staff Training Logs), which may include additional information about safeguarding and explicit training on the code of conduct and related policies, and testing the new staff member's knowledge and give them the opportunity to ask more questions
  - Safeguarding training tailored to the role, skills and experience of the new staff member
  - Increased supervision - making sure the new staff member is not unsupervised for a period of time
  - An extended probationary period
  - Staff vigilance

These steps are taken in line with the outcomes of the risk assessment and discussions with the relevant senior leadership team members (including safer recruitment lead and DSL). The decision to implement additional control measures and proceed with appointment is strictly taken on a case by case basis and is not the default. All additional control measures are documented.

### **Overseas candidates and the National Tutoring Programme**

Seven Springs Education is also dedicated to safer recruitment and the safeguarding of all students as part of its services carried out with the National Tutoring Programme. All avenues are exhausted to obtain the relevant checks on a candidate's time living or working overseas. In the first instance, an overseas criminal records check will be provided where available.

In instances where Seven Springs Education is unable to obtain an overseas criminal records check, evidence of why it has not been possible to carry out the checks is recorded in the form of (examples):

- correspondence with the relevant authority confirming that they are unable to carry out a check or evidence from an official UK government source such as gov.uk.
- an explanation of alternative methods that have been used to check suitability of candidates, as well as full details of the risk assessment undertaken that supports informed decision making on whether to proceed with the appointment
- evidence from (e.g. screenshot) the relevant authority's website confirming that they do not offer or are unable to carry out a criminal records check
- correspondence from the relevant authority confirming that they do not provide checks in the required circumstances.

In keeping with our Safer Recruitment Policy and procedures, no tutor is deployed prior to the relevant pre-appointment checks and processes having been completed.

## Template risk assessment for candidates who have lived or worked overseas

RISK	CONSIDERATIONS	NOTES	RISK RATING (HIGH, MEDIUM, LOW)	ACTION REQUIRED (including any additional control measures determined to proceed with appointment)
Information disclosed on the self-declaration or DBS check	<ul style="list-style-type: none"> <li>• How old is the DBS?</li> <li>• Are there any convictions, cautions or other relevant information listed? Are any of them recent?</li> <li>• Has the candidate provided the original certificate?</li> <li>• Is the check the right level of check (enhanced, or enhanced with barred list information if appropriate)?</li> <li>• Has information been revealed about convictions or cautions overseas?</li> </ul>	In instances of a disclosure , refer to guidance on how to manage a criminal records disclosure		
Employment history	<ul style="list-style-type: none"> <li>• Are there any unexplained gaps in their employment history?</li> <li>• Have they provided a satisfactory explanation for why they left their last job?</li> <li>• Have we confirmed that the job history they've provided is accurate?</li> <li>• Do gaps in employment, or frequent job changes, that relate to time spent abroad, make it harder for you to get a comprehensive picture of the candidate's suitability?</li> </ul>	<p>Example areas for questioning:</p> <ul style="list-style-type: none"> <li>• finding out what attracted the candidate to the post being applied for and their motivation for working with children;</li> <li>• exploring their skills and asking for examples of experience of working with children which are relevant to the role; and</li> <li>• probing any gaps in employment or where the candidate has changed</li> </ul>		

		employment or location frequently, asking about the reasons for this.		
Checks on overseas criminal records	<ul style="list-style-type: none"> <li>• Has it been possible to complete a check on overseas criminal records?</li> <li>• Has information been revealed about convictions or cautions?</li> </ul>	Refer to Home Office guidance on overseas checks. Not available for all countries. If no check can be completed, provide evidence of why.		
References	<ul style="list-style-type: none"> <li>• Have they provided appropriate references?</li> <li>• Have the references been received?</li> <li>• Did the references mention any causes for concern? If so, have we followed up?</li> <li>• Does overseas work experience relate to work with children, or in an educational setting?</li> <li>• Has the candidate returned references covering the full period spent abroad?</li> </ul>	<p>Candidates are required to provide referees covering their entire period spent overseas, or from age 16 if born overseas.</p> <p>If not, consider whether the candidate is suited to work with children.</p> <p>Where there are gaps in references, probe the reasons given for this to assess risk.</p>		
Roles in regulated activity, or other risky roles	<ul style="list-style-type: none"> <li>• Is there a comprehensive picture of the candidate's history?</li> <li>• Does the information (references, DBS check) provide sufficient understanding of the candidate's history and character?</li> </ul>			
Nature of time spent abroad	<ul style="list-style-type: none"> <li>• How old was the candidate when they lived or worked abroad?</li> <li>• How much time was spent abroad?</li> <li>• When did the candidate return?</li> </ul>			

Conduct at interview	<ul style="list-style-type: none"> <li>• Did their conduct or presentation during the interview stage raise any questions or concerns?</li> </ul>	<p>Areas that may be concerning and lead to further probing include:</p> <ul style="list-style-type: none"> <li>• implication that adults and children are equal;</li> <li>• lack of recognition and/or understanding of the vulnerability of children;</li> <li>• inappropriate idealisation of children;</li> <li>• inadequate understanding of appropriate boundaries between adults and children; and,</li> <li>• indicators of negative safeguarding behaviours.</li> <li>• lack of recognition and/or understanding of how safeguarding guidance and responsibilities differ in the UK to previous countries of employment or residence.</li> </ul>		
Application Process	<ul style="list-style-type: none"> <li>• Have their answers been consistent across all stages of the interview process?</li> </ul> <p><i>(If the answer is 'no', make a note of when and how you followed up on inconsistencies or anomalies)</i></p>			
Additional recruitment checks	<ul style="list-style-type: none"> <li>• Is the applicant fit to work?</li> <li>• Have we completed qualification checks and prohibition from teaching checks (where relevant)?</li> <li>• Have 'right to work' checks been completed?</li> <li>• Have additional appropriate checks been made following this risk assessment for candidates lacking overseas criminal records checks, or for whom knowledge or confidence gaps still exist?</li> </ul>	<p>For further information on appropriate additional checks, refer to Safer Recruitment of Candidates with Overseas Experience Policy.</p>		

## Assessing risk

High risk examples:

- Never lived in the UK
- Returned from being abroad within the last year, and they spent more than 3 months abroad
- Returned from being abroad within the last 5 years, and they spent over a year abroad
- Employment history, overseas criminal record check (or lack thereof), interview and references haven't given you clear or sufficient information about their time abroad
- Never worked with children or in an educational setting

Medium risk examples:

- Last overseas (for longer than 3 months) more than 5 years ago, they've lived in the UK for at least 5 years and have had a DBS check within the last year, but information about their time abroad is patchy
- Have been teaching in the UK for less than 5 years, and they've received positive references from previous UK employment in educational settings or with children
- Have lived or worked in 2 or more overseas countries (not in an educational setting or with children)

Low risk examples:

- Once lived abroad but they've now lived in the UK for more than 10 years, and the wider recruitment process has raised no other concerns
- Have worked in an educational setting or with children abroad, and you have references from these employers
- Have previously been employed by, or are transferring from, Seven Springs Education's sister organisation Nebula Group Ltd in Hong Kong with positive references

## Recruitment of Ex-offenders policy and procedure.

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), Seven Springs Education complies fully with the [code of practice](#) and undertakes to treat all applicants for positions fairly.

Seven Springs Education undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

Seven Springs Education can only ask an individual to provide details of convictions and cautions that Seven Springs Education is legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).

Seven Springs Education can only ask an individual about convictions and cautions that are not protected.

Seven Springs Education is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

Seven Springs Education has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process (**See Dealing with convictions**).

Seven Springs Education actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcomes applications from a wide range of candidates, including those with criminal records.

Seven Springs Education selects all candidates for interview based on their skills, qualifications and experience.

An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

Seven Springs Education ensures that all those in Seven Springs Education who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

Seven Springs Education also ensures that it has received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, Seven Springs Education ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

Seven Springs Education makes every subject of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and makes a copy available on request.

Seven Springs Education undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

## Dealing with convictions

Seven Springs Education operates a formal procedure if a DBS Certificate is returned with details of convictions.

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the organisation considers the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and the circumstances surrounding the offence and the explanation(s) offered by the applicant.

It is the organisation's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder
- manslaughter
- rape
- other serious sexual offences
- grievous bodily harm
- or other serious acts of violence;
- or serious class A drug related offences,
- robbery,
- burglary,
- theft,
- deception or fraud.

If the post involves access to money or budget responsibility, it is the organisation's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

## Retention and security of disclosure information

Our policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

In particular, we:

- Store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which is restricted, or in secure, password-protected online storage where physical copies are not required;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months.

- We keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken;
- Ensure that any disclosure information is destroyed by suitably secure means such as shredding; and prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

If a DBS Certificate reveals any convictions, the person concerned is invited to attend an interview with a member of our recruitment panel to discuss the conviction(s) and circumstances. Following this meeting a risk assessment is carried out and a decision made and communicated back to the person concerned. For safer recruitment purposes, until this decision has been made the applicant should not commence employment.

## **Senior Management Team**

All members of the Senior Management Team have an enhanced DBS check without barred list information. They have an enhanced DBS check with barred list information if working in regulated activity.

## Appendix 3: allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff has:

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

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

A 'case manager' will lead any investigation. This will be the DSL or a member of the Senior Leadership Team where the DSL is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

### Suspension of the accused until the case is resolved

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

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

- Redeployment within Seven Springs Education so that the individual does not have contact with the child or children concerned
- Providing an assistant to be present when the individual has classes with children
- Redeploying the individual to alternative work in Seven Springs Education so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment

### Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

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

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

If we are made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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

## **Timescales**

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 5 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

## **Specific actions**

### **Action following a criminal investigation or prosecution**

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

### **Conclusion of a case where the allegation is substantiated**

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

### **Individuals returning to work after suspension**

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

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending Seven Springs Education.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

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

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

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

### **Record-keeping**

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

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

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## Non-recent allegations

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

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

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

## Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion

- Complaint
- Disclosure made by a child, parent or other adult
- Pre-employment vetting checks

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

## Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the relevant designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

## Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in our safeguarding system

## Responding to low-level concerns

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

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

The DSL will use the information collected to categorise the type of behaviour and determine any further action, in line with our staff behaviour policy and code of conduct.

## Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at Seven Springs Education

## References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the relevant local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Appendix 4: specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education (KCSIE). For further details on specific safeguarding issues, please refer to the latest version of KCSIE.

### Children absent and missing from education

A child being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

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

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

We will follow our procedures for absences and for dealing with children who go missing from education. We will report to the school of any absences as stated in the Attendance Policy.

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

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

### Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol

- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

## Domestic abuse

The Domestic Abuse Act 2021 recognises children as victims of domestic abuse in their own right if they see, hear or experience the effects of abuse.

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the child's school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The school's DSL will provide support according to the child's needs and update records about their circumstances. They may choose to inform Seven Springs Education where deemed necessary.

## Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends

- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

## Homelessness

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

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

Our staff are trained to recognise signs that a child is homeless or at risk of becoming homeless. The DSL will raise concerns with the school where concerns are raised by a member of staff.

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

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

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

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

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

## FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems

- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher/tutor or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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. Threats can be physical or emotional and psychological.

Please note that as of February 2023 it is illegal in England and Wales for young people aged 16 and 17yrs to marry, as the minimum age is raised to 18yrs. In addition, under the Marriage and Civil Partnership (Minimum Age) Act, it is now a crime to exploit vulnerable children by arranging for them to marry or enter into a civil partnership under any circumstances, whether force is used or not. This includes "traditional" ceremonies that are legally non-binding, but which are still viewed as marriages by the parties and their families.

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

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

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

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

We believe we have a duty to prevent children from being drawn into terrorism. The DSL has undertaken Prevent awareness training and makes sure that staff have access to appropriate training to equip them to identify children at risk.

We continually assess the risk of children at Seven Springs Education being drawn into terrorism. This risk assessment is a live document and updated based on discussion with partner schools who have an understanding of the potential risk in their local area, in collaboration with their local safeguarding partners and local police force.

We ensure that students are familiar with the online safety policy, and equip our students to stay safe online at school and at home.

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

Staff are alert to changes in students' behaviour.

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

- Refusal to engage with, or becoming abusive to, children who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech

- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on our measures to prevent radicalisation are set out in other policies and procedures, including [online safety policy](#).

## Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

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

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our approach to this type of abuse.

## **Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

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

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our approach to this type of abuse.

## **Harmful sexual behaviour**

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB).

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

## **Serious violence**

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups

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

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

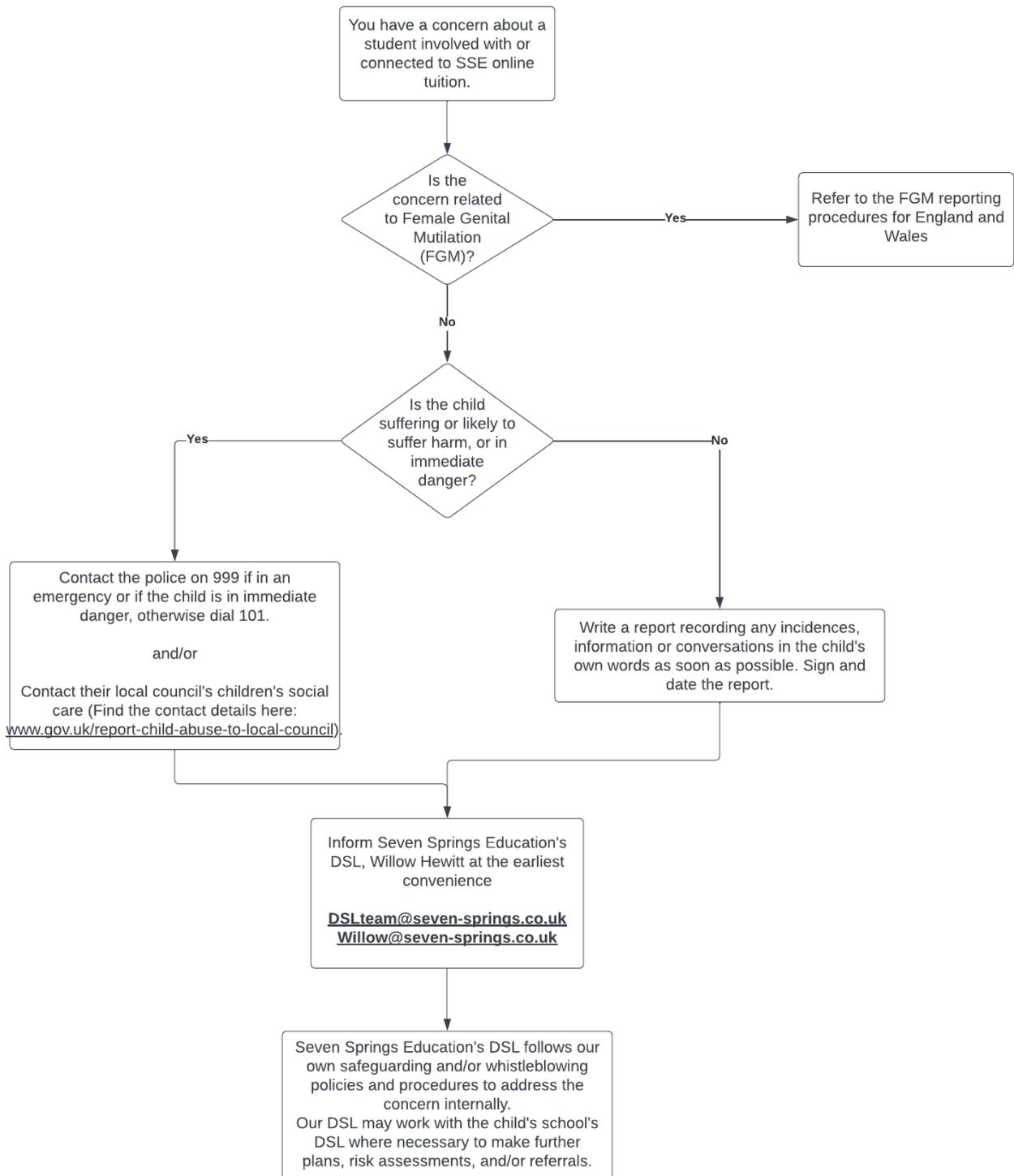
- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

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

## Appendix 5: safeguarding reporting procedure - National Tutoring Programme

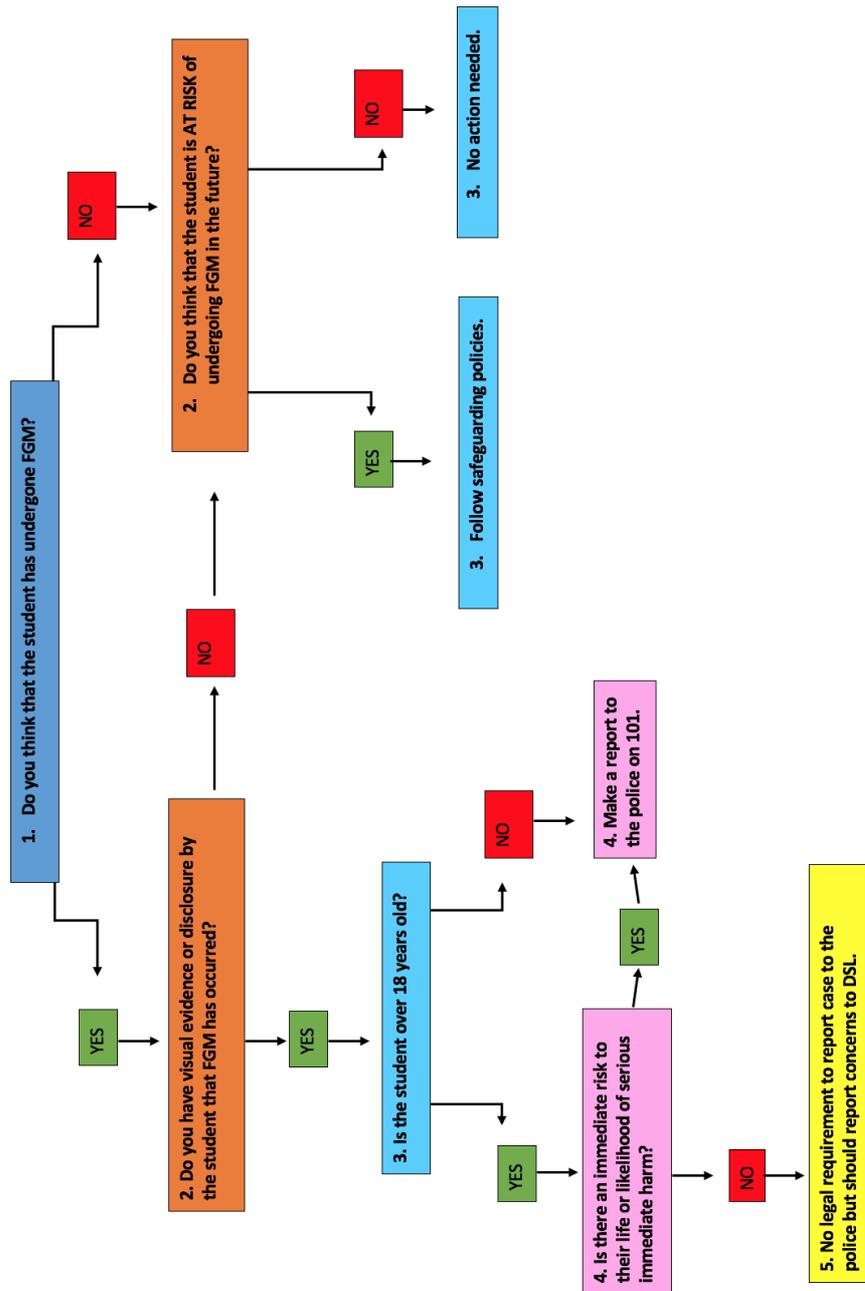
When working as a part of the National Tutoring Programme (NTP), the relevant school will be notified of any safeguarding concerns as part of our reporting procedure. We will work with the relevant school to follow their safeguarding procedures.

### Safeguarding Reporting Procedure

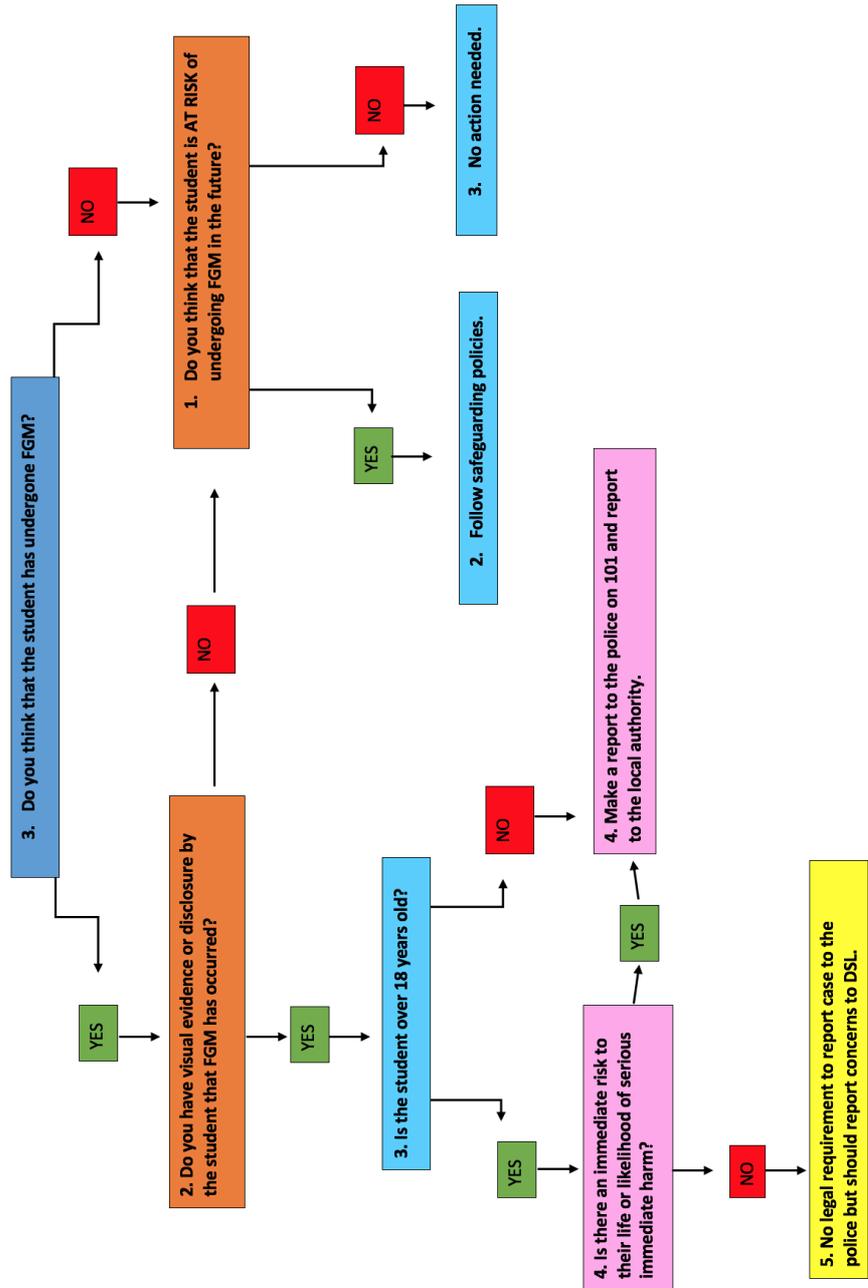


# FGM Reporting Diagram

For England:



**For Wales:**



## Appendix 6: mental health and wellbeing policy

### Statement on mental health and wellbeing

Seven Springs Education is committed to supporting the emotional and mental health and wellbeing of our students and staff. We have a positive and nurturing approach embedded across our organisation intended to promote empathy and resilience. We understand that stressful and worrying situations are a part of all our lives and that stressors can affect us in different ways. We are committed to focusing on the individual and being vigilant to individuals coping with stressors, responding where appropriate to support mental health and wellbeing.

### Our core principles for mental health and wellbeing

It is our belief that promoting wellbeing and positive mental health is a key part of our work to educate and develop children and young people.

Seven Springs Education's core principles for promoting wellbeing and positive mental health are:

- Nurturing positive qualities, such as empathy, optimism, forgiveness and compassion and providing opportunities for students to use them within tuition sessions.
- Recognising and reinforcing qualities that are key to resilience (emotional resilience, mental resilience and academic resilience).
- Avoiding focus on failure and negative behaviours, instead taking a positive first response (including positive reinforcement, praise and reward) to misbehaviour.
- Teaching by example and consistently supporting our staff members.
- Promoting feelings of competency and self-esteem so that students believe in their ability to achieve their goals in sessions and across courses.
- Setting and communicating realistic and achievable expectations and goals for students.
- Ensuring that students know and feel able to reach out for help when needed.

To support these core principles, Seven Springs Education has implemented:

- A Designated Mental Health Lead (DMHL) to oversee our approach to mental health and wellbeing in collaboration with the Designated Safeguarding Lead (DSL).
- Staff training in promoting wellbeing and positive mental health in tuition sessions, and in identifying and responding to mental health concerns and specific conditions.
- Collaboration with parents regarding any concerns and actions (except in certain safeguarding circumstances where we adhere to our procedures to keep students safe).
- A hub of wellbeing resources on *Spring* to highlight sources of information and support about mental health and wellbeing.
- Liaison with external agencies, such as students' schools, Children and Young People's Mental Health Services (CYPMHS), and other services to report our concerns and seek additional support for students where appropriate.

Please refer to our Behaviour Policy for further information on how we take account of mental health in relation to misbehaviour and classroom management.

### Risk factors

In supporting the mental health and wellbeing of students, we recognise the complex interplay between risk factors and key protective factors which promote resilience. There are a number of risk factors that may increase the prevalence of mental health difficulties and conditions and which our staff are aware of.

This includes some groups of students, such as:

- Students with SEND
- Looked-after and adopted children
- Children in Need
- Children with a social worker
- Children in care or who have left care
- Children affected by socio-economic disadvantage
- Those exposed to contextual safeguarding risks e.g. adverse childhood experiences (ACEs), child sexual exploitation (CSE), child criminal exploitation (CCE).

Additional risk factors and characteristics include:

- Academic failure
- Low self-esteem
- Communication difficulties
- Bullying
- Discrimination
- Peer pressure
- Poor student/teacher relationships

## Identifying needs and warning signs

As our Behaviour Policy states, Seven Springs Education recognises that changes in a student's behaviour or emotional state may be an indication of an underlying mental health difficulty. This may present as:

- Changes in their emotional state e.g. becoming withdrawn, fearful and having low self-esteem
- Changes in behaviour e.g. becoming challenging and oppositional, displaying aggression or physical symptoms, which may present as distractions to classmates
- Changes in interpersonal behaviours e.g. excessive clinginess, being coercive and controlling, failing to understand and recognise emotions

All staff are trained in identifying and responding to mental health concerns and specific conditions. We will always take a students' mental health and wellbeing into consideration when responding to misbehaviour. Careful examination will be made to determine if mental health difficulties are contributing to behaviour difficulties and withdrawing students permanently from tuition remains a last resort.

All staff receive training on recognising mental health difficulties and identifying warning signs and concerns. These warning signs should always be taken seriously, and staff observing any of these warning signs should communicate their concerns with the Designated Mental Health Lead **and** the Designated Safeguarding Lead.

Possible warning signs include:

- Changes in emotional state
- Changes in behaviour
- Changes in interpersonal behaviours
- Reporting changes in eating / sleeping habits
- Becoming socially withdrawn
- Changes in activity and mood
- Talking or joking about self-harm or suicide
- Expressing feelings of failure, uselessness or loss of hope
- Repeated physical pain or nausea with no evident cause

- An increase in lateness or absenteeism
- Poor concentration
- A change in character
- Excessive/increased irritability or emotional responses
- Lack of emotional responses
- Anxiety including nervousness, excessive worry, low mood

**Contact**

Seven Springs Education welcomes communication from parents/carers in relation to students’ mental health and wellbeing. If parents/carers wish to speak to Senior Leadership about a change in their child’s behaviour, mental health or wellbeing then they should contact the DMHL **and** the DSL.

Designated mental health lead (DMHL)	Ceri Moss	<a href="mailto:DMHLteam@seven-springs.co.uk">DMHLteam@seven-springs.co.uk</a> <a href="mailto:ceri@seven-springs.co.uk">ceri@seven-springs.co.uk</a>
Designated safeguarding lead (DSL)	Willow Hewitt	<a href="mailto:DSLteam@seven-springs.co.uk">DSLteam@seven-springs.co.uk</a> <a href="mailto:willow@seven-springs.co.uk">willow@seven-springs.co.uk</a> 07392013379 (out-of-hours)

## Appendix 7: Personalised safeguarding risk assessment

Date of Assessment	Date of Next Review (recommended at least annually)

### Student's Details

Full Name	Date of Birth	School Name

### Parent's / Teacher's / Guardian's Details

Full Name	Relationship to the Student	Email Address	Telephone Number

## Risk Assessment

<b>Safeguarding incident/concern</b>	<b>Outline of the situation</b>	<b>Risk level (High, Medium or Low)</b>	<b>Precautions taken to reduce the risk</b>	<b>Further actions required to reduce risk</b>	<b>People responsible for managing concerns</b>

In assessing risk, consider the impact of this upon all individuals involved. To assess whether the risk is high, medium or low consider:

- Is this the first concerning incident for this individual?
- How many people have been affected?
- What is the impact on the child?
- What is the account of the individual potentially causing harm?
- What is this person's attitude to the incident?

- What other background factors (such as location or others involved as victims, participants, colluders, supporters) have a bearing on the situation?
- What do others (witnesses, the child concerned) say about what took place?
- What is the likelihood of this recurring?

Risk = impact x severity of the breach of procedures. For example:

- High – severe impact caused by the behaviour plus serious breach of the codes of conduct
- Medium – moderate impact caused by the behaviour plus moderate breach of the codes of conduct
- Low – minor impact plus a minor breach of the codes of conduct

Decisions and actions in response to the risk (including reason)

These require a two-pronged approach:

1. Actions to prevent further risk – these could include, for example, suspension of the child from lessons, adding supervision or increasing the ratio of adults to children, a period of mentoring or monitoring
2. Actions in response to the incident – informed by the risk assessment, decisions or recommendations should be made by the DSL. These could include some of the prevention measures above to reduce the risk level, but in some cases further temporary or permanent action may be required to achieve long-term levels of low risk (for example, through disciplinary action)

## Appendix 8: Template Form for Recording General Safeguarding Issues

Use this form to record general safeguarding issues that might affect all or several students with Seven Springs Education. Please note that it is not suitable for individual student concerns, in these instances you can use Appendix 9: Template Child Protection Concern Form to support your report to the DSL.

GENERAL SAFEGUARDING CONCERN		
Name:	Date:	Time:
Nature of concern:		
Signed:		

RESPONSE TO GENERAL SAFEGUARDING CONCERN	
Name:	Role:
Does this require a child protection concern form? Yes / No	

Action to be taken:

Individual responsible:

Deadline:

Signed:

Individual responsible for following up:

Signed:

Once the issue has been resolved, the DSL should store this record should be stored in the Child Protection folder.

## Appendix 9: Template Child Protection Concern Forms

### Logging a concern about a child’s safety and welfare

#### Part 1 (for use by any staff)

Staff may use this form as a template to support safeguarding reports to the DSL. It is not compulsory for staff to use this form in the first instance, however the DSL may request its completion to maintain clear and consistent records and to facilitate accurate information gathering. Complete as much of this form as you are able to, the DSL may be able to assist you in filling in any gaps.

For concerns relating to FGM, please ensure you have first consulted the reporting procedures.

<b>Child’s Name:</b>	<b>Date of Birth (if known):</b>		
<b>Class:</b>			
<b>Date and Time of Incident:</b>	<b>Date and Time (of writing):</b>		
<b>Your Name:</b> ..... <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><b>Print</b></td> <td style="width: 50%; border: none;"><b>Signature</b></td> </tr> </table>		<b>Print</b>	<b>Signature</b>
<b>Print</b>	<b>Signature</b>		
<b>Job Title:</b>			
<b>Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?</b>  			
<b>What is the child’ account/perspective?</b>			
<b>Any other relevant information (distinguish between fact and opinion). Previous concerns etc.</b>			

**What needs to happen? Note actions, including names of anyone to whom your information was passed and when.**

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

**Please pass this form to the Designated Safeguarding Lead.**

**Part 2 (for use by DSL)**

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

**Logging concerns/information shared by others external to Seven Springs Education (Pass to DSL)**

<b>Child's Name:</b>	<b>Date of Birth (if known):</b>
<b>Class:</b>	
<b>Date and Time of Incident:</b>	<b>Date and Time of receipt of information:</b> Via letter / telephone etc.
<b>Name of caller/provider of information:</b>	<b>Organisation/agency/role:</b>
<b>Contact details (telephone number/address/e-mail):</b>	<b>Relationship to the child/family:</b>
<b>Information received:</b>	
<b>Actions/Recommendations for Seven Springs Education:</b>	
<b>Outcome:</b>	
<b>Your Name:</b>	
..... <b>Print</b>	..... <b>Signature</b>
<b>Date and time completed:</b>	

## Body Map Guidance

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

**\*At no time should an individual member of staff take photographic evidence of any injuries or marks to a child's person, the body map below should be used. Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. Social Care direct or child's social worker if already an open case to social care.**

**When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:**

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

### **Ensure First Aid is provided where required and record**

A copy of the body map should be kept on the child's concern/confidential file.

## BODYMAP

(This must be completed at time of observation)

Name of  
Child:

Date of  
Birth:

.....

.....

Name of  
Staff:

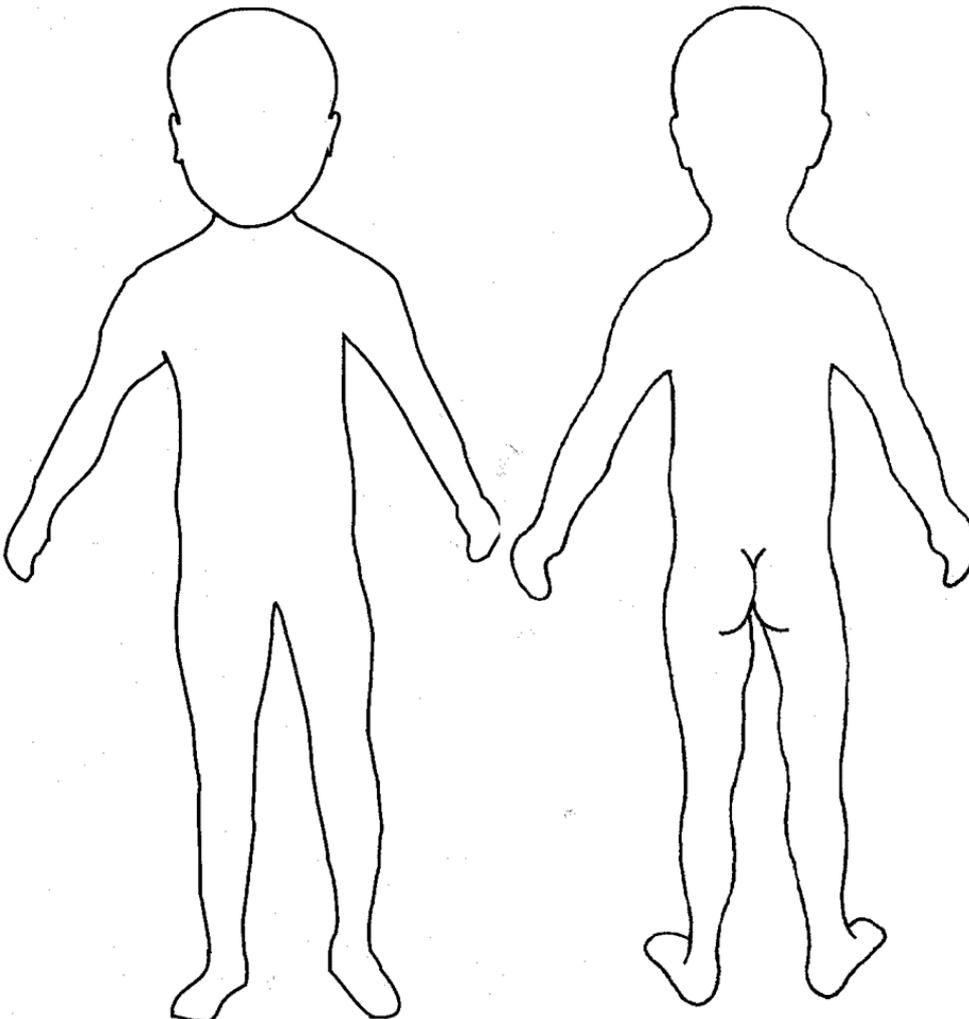
Job title:

.....

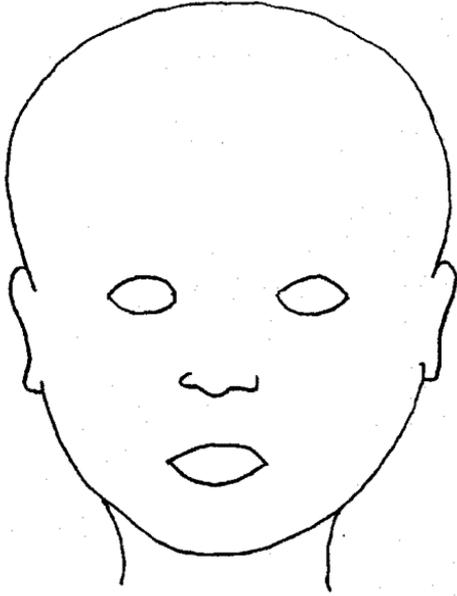
.....

Date and time of  
observation:

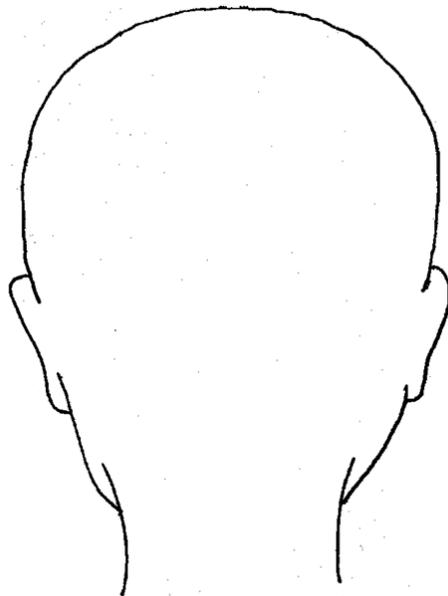
.....



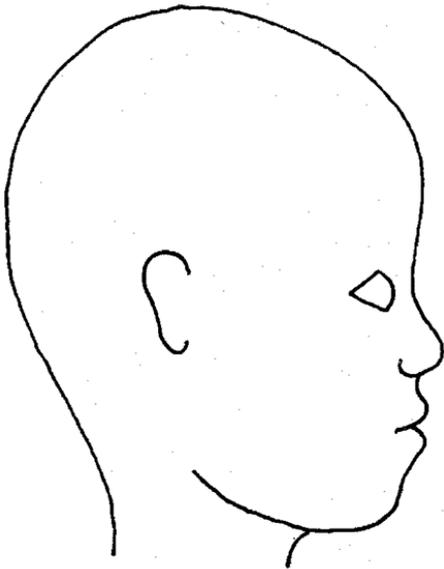
**FRONT**



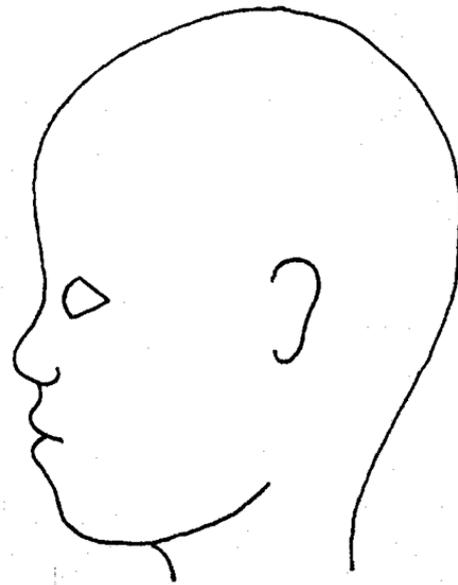
**BACK**



**RIGHT**



**LEFT**

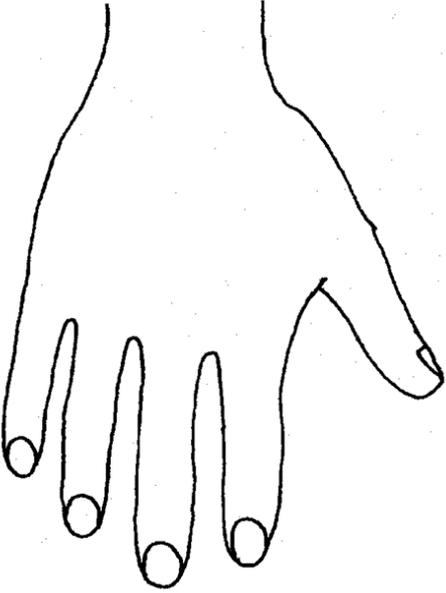


**Your Name:**

.....  
**Print**

.....  
**Signature**

**Date and time completed:**

<p>R</p> 	<p>L</p> 
<p>R</p> 	<p>L</p> 
<p><b>Your Name:</b></p> <p>.....</p> <p><b>Print</b> <span style="margin-left: 200px;"><b>Signature</b></span></p>	
<p><b>Date and time completed:</b></p>	

