ALMA EDUCATION

Child Protection & Safeguarding Policy 2026/2027

Wirral

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Approved by:	Cathryn Williams Advisory Board

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National Police Prevent Advice Line		0800 011 3764
Police (Safer Schools Police Officer)		101 (non-emergency) 999 (emergency)

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Statement of Intent

Alma Education is committed to safeguarding and promoting the welfare of every young person in its care. This policy sets out the basis for good practice within Alma Education for safeguarding and protecting children and young people, and applies to all adults working in or on behalf of Alma Education.

Alma Education's learning mentors work in community settings, learners' homes and Alma hubs, often in 1:1 or small-group arrangements. Safeguarding is everyone's responsibility, and every member of staff is expected to act promptly and appropriately whenever a concern arises.

This policy has been developed in line with statutory guidance and the arrangements agreed and published by the Wirral Safeguarding Children Partnership, and is reviewed regularly to ensure it reflects current legislation and best practice.

Legislation and Statutory Guidance
Keeping Children Safe in Education 2026
Working Together to Safeguard Children 2026
School Staffing (England) Regulations 2009
Children Act 1989 (and 2004 amendment)
Children's Wellbeing and Schools Act 2026
Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
Statutory guidance on FGM
Rehabilitation of Offenders Act 1974 (2020)
Safeguarding Vulnerable Groups Act 2006
Prevent Duty Guidance: England and Wales 2023
Counter-Terrorism and Security Act 2015
Crime and Policing Act 2026
Education Act 2002
Human Rights Act 1998
Equality Act 2010

Aims

> *"Safeguarding is everyone's responsibility. For services to be effective each professional and organisation should play their full part."*
>
> *Working Together to Safeguard Children, HM Government*

This policy document provides the basis for good practice within Alma Education for safeguarding and protecting children and young people. Alma Education aims to ensure that:

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

Alma Education's Safeguarding and Child Protection Policy applies to all adults working in or on behalf of Alma Education and is an overarching document which demonstrates how everyone working with Alma Education shares an objective to help keep young people safe from harm and abuse. We are committed to safeguarding and promoting the welfare of all of our learners and will always take a considered and sensitive approach in order to support all learners and we recognise that the safety and welfare of each learners is of paramount importance.

We aim to ensure that:

- learners within Alma Education feel safe at all times.
- our ethos promotes high levels of self-confidence and self-esteem in all of our learners.
- all members of the Alma community are safe and are able to put the welfare of learners first without concern that there will be any negative consequences attached to their actions.
- we promote and nurture positive relationships between all members of Alma Education community.
- all adults who have contact with young people at Alma Education have been properly vetted and cleared as suitable to work and support young people in our care.
- all adults who have contact with young people at Alma Education have been trained to undertake their safeguarding responsibilities effectively.

The policy is available publicly for Alma Education community via Alma Education website. Parents and carers are informed that safeguarding concerns may result in referrals to external agencies, in line with statutory duties and Alma Education's commitment to promoting the welfare of every child.

2. Legislation and Statutory Guidance

> *"All staff members should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges."*
>
> *Keeping Children Safe in Education*

The policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026) and Children's Wellbeing and Schools Act 2026 to comply with current guidance and the arrangements agreed and published by the three statutory safeguarding partners and one strategic partner, who together form the Wirral Safeguarding Children Partnership.

This policy is also based on the following legislation:

- 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), and the Children's Well-being and Schools Act (2026) which provides a framework for the care and protection of young people.
- 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, (2020) which outlines when people with criminal convictions can work with young people.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to young people.
- Statutory guidance on the Prevent duty 2023, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

- Crime and Policing Act 2026 to recruit safely and tackle the epidemic of serious violence and violence against women and girls.

Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make the necessary arrangements for ensuring that their functions relating to the conduct of Alma Education are exercised with a view to safeguarding and promoting the welfare of children who are learners at Alma Education. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.

Under Section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to co-operate with the local authority to improve the wellbeing of children in the local authority area.

Under Section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a school or further education institution to supply information in order to perform its functions. This must be complied with.

All procedures can be found on the Wirral Safeguarding Children Partnership website.

Human Rights Act 1998, Equality Act 2010 and the Public Sector Equality Duty

Alma Education recognises that safeguarding is intrinsically linked to upholding the rights and freedoms of all children. We acknowledge our legal obligations under:

Human Rights Act 1998 (HRA)

We understand that it is unlawful for any public authority, including a school, to act in a way that is incompatible with the rights set out in the European Convention on Human Rights. Children have, for example:

- The right to education (Protocol 1, Article 2)
- The right to be free from degrading treatment (Article 3)
- The right to respect for private and family life (Article 8)
- Our safeguarding and child protection procedures aim to ensure that no child in our care is subject to inhuman or degrading treatment, and that their right to be heard and respected is fully upheld.

Equality Act 2010

We are committed to protecting children from unlawful discrimination, harassment and victimisation on the basis of any protected characteristic (including age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

We will monitor and address any behaviour, whether staff-to-child or child-on-child, that could amount to discrimination, bullying or harassment (including prejudice-based and discriminatory bullying).

Where there is evidence that certain groups (e.g. girls, learners from a particular ethnic group, or LGBTQ+ learners) may be disproportionately subject to harassment or abuse, we will take proportionate measures (so-called "positive action") to mitigate potential harm and meet learners' specific needs.

Public Sector Equality Duty (PSED)

We acknowledge our legal obligation to have due regard to:

- Eliminating discrimination, harassment, and victimisation.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.
- Recognise that safeguarding issues such as sexual violence, racist incidents or homophobic and transphobic bullying can be closely linked to discriminatory attitudes. To protect learners effectively, staff will proactively track patterns of behaviour and will intervene early to challenge any form of discrimination or abuse.

Implementing These Duties

- Alma-Wide Culture: We integrate human rights and equality principles throughout our safeguarding training, policies and day-to-day practice, ensuring staff are aware of their duties and consistently model inclusive and respectful conduct.
- Policy Monitoring: routinely review policy and related procedures (e.g., Anti-Bullying, Behaviour, Code of Conduct) to ensure they promote and uphold the rights of all children, irrespective of their background or characteristics.
- Record-Keeping and Data: monitor and evaluate safeguarding incidents and patterns in a relevant and proportionate way (e.g. bullying or harassment cases). Considering protected characteristic in order to identify emerging concerns and evidence-based solutions.
- Listening to Children: value the voice of the child and ensure mechanisms for learners to report concerns are robust, visible, readily accessible and well publicised. Take any report seriously and respond in a timely, child-centred way.

By embedding statutory obligations into Alma Education's safeguarding framework, we can demonstrate a strong commitment to ensuring that no child is disadvantaged, harassed or denied the ability to thrive and learn in a secure, respectful environment.

3. Definitions

Safeguarding and promoting the welfare of young people means:

- Protecting young people from maltreatment
- Preventing impairment of young people's mental and physical health or development
- Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge

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

Abuse is a form of maltreatment of a young person and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse in more detail.

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

In line with the law, this policy defines a child as anyone under the age of 18 years but in the case of SEN it is up to 25 years of age.

The following three statutory 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). They make arrangements to work together to safeguard and promote the welfare of local young people, including identifying and responding to their needs. The fourth strategic partner is Education.

- The Local Authority (LA)

- Wirral Clinical Commissioning Group
- Merseyside Police

4. Equality Statement

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

Giving special consideration to young people who:

- Have special educational needs (SEN) or disabilities (see section 9)
- 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
- Are currently or previously have been allocated a social worker

5. Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and Advisory Board members in Alma Education and is consistent with the procedures of the Wirral Safeguarding Children Partnership.

The policy and procedures also apply to sessions delivered in learners' homes, community settings and any Alma hub.

The curriculum is designed so that safety issues within each subject are discussed and safe practices explained, such as using equipment properly in PE, Science and Design and Technology. Appropriate and agreed learner-to-adult ratios are always maintained wherever a session takes place. The learning mentor leading any trip or community activity always undertakes a risk assessment to ensure learners are safeguarded and protected from harm before the activity is finally authorised by the Director of Education, who acts as Alma's educational visits coordinator.

Visiting speakers, with correct clearance and/or constant supervision are always welcome into school so that they can impart specialist knowledge to the learners.

All Staff

All staff will read and understand part 1 in full the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2026, and review this guidance at least annually.

All staff will be aware of:

- 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 deputies, the behaviour for learning policy and the safeguarding response to young people who go missing from education.
- The family help process 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.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a young person tells them they are being abused or neglected, including specific issues and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

Section 7 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

Designated Safeguarding Lead (DSL)

> *"The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns."*
>
> *Keeping Children Safe in Education*

The DSL at Alma Education is Melanie Steel, Director of Education. The DSL takes lead responsibility for child protection, online safety and wider safeguarding.

- Robust cover arrangements for when the DSL is unavailable are in place (for example a confidential shared mailbox to make sure safeguarding concerned are received, monitored and acted on without delay)

- When the DSL is absent, the deputy DSL will act as cover. The Deputy DSLs are trained to the same level as the DSL. Further details of DSL role can be found here (Annex B KCSIE)

If the DSL is not available, concerns should be reported to the Director of Education. In the exceptionally rare circumstance that neither is available, advice should be sought by phoning the Integrated Front Door (0151 606 2008).

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

- Provide advice and support to other staff on child welfare and child protection matters.

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of young people.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Prevent/Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Ensure that employees and Advisory Board members are aware of, understand and can discharge their role and responsibilities under this policy.
- Attend any applicable training.

The DSL will also keep the Director of Education informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The DSL will also help to promote positive educational outcomes by sharing with staff information about welfare, safeguarding and child protection issues that young people (including those with a social worker) are experiencing or have experienced. This will include ensuring staff know who these young people are, understand the barriers to learning which they may face, maintain high expectations and offer appropriate support and adjustments. The full responsibilities of the DSL and deputies are set out in their job description.

The DSL is responsible for the oversight and analysis of safeguarding records (e.g. through electronic records system) to identify patterns and inform strategy.

The DSL is responsible for overseeing mental health concerns that constitute safeguarding issues, ensuring timely referrals and coordination with services such as CYPMHS, mental health support team's (MHST). counselling, or other pathways through Branch. All staff should be aware that mental health issues can be both a cause and symptom of abuse, neglect or exploitation.

In line with Wirral Safeguarding Children Partnership guidance, the DSL will access regular safeguarding supervision to support reflective practice and sound decision-making in complex cases. Opportunities for supervision and debriefing will also be provided for staff working directly with children on child protection, child in need or Family Help plans, recognising the emotional impact and complexity of safeguarding on all members of staff and on DSLs.

Advisory Board

The Advisory Board will approve this policy at each review; ensure it complies with the law and hold the Director of Education to account for its implementation.

The Advisory Board will appoint a Advisory Board link member to monitor the effectiveness of this policy in conjunction with the full Advisory Board.

The Chair of Advisory Board members will act as the 'case manager' in the event that an allegation of abuse is made against the Director of Education, where appropriate (see Appendix 3).

The Advisory Board members shall ensure that children are taught about how to keep themselves and others safe against online and offline threats. This includes ensuring that any children with additional needs have tailored provision.

The Advisory Board members will understand the local criteria for action and assessment and ensure that these are reflected in policies and procedures.

Safeguarding is reviewed annually by the Advisory Board, including filtering and monitoring systems, training completion, and recruitment practices. Records of these reviews will be kept and Advisory Board members will read Keeping Children Safe in Education 2026. Section 12 has information on how Advisory Board members are supported to fulfil their role.

Director of Education

The Director of Education is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Communicating this policy to parents when their child joins Alma Education and via Alma Education's 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 or volunteer, where appropriate (see Appendix 3).

Keeping Sessions Secure

Alma Education aims to keep every session secure, wherever it takes place, whether in a learner's home, a community setting or an Alma hub. This is only as secure as the people involved, so everyone present at a session follows the arrangements that support it. It is recognised that laxity can cause potential problems in safeguarding. Therefore, Alma Education ensures that:

- Learning mentors confirm the arrangements for each session location, whether a learner's home, a community setting or an Alma hub, in advance.
- Learning mentors ensure that no unauthorised person is present during a session.
- Alma hubs are kept secure to prevent intrusion, in line with the arrangements agreed with each hub.
- Where a session takes place at an Alma hub, visitors and staff follow the hub's arrangements for arrival and parking.
- Where a session takes place at an Alma hub, visitors sign in on arrival and are reminded to wear identification while they are present.
- Learners are only allowed home with adults/carers with parental responsibility or when confirmed permission has been received in advance.
- Should a learner leave a session without permission, staff must inform the DSL and the Director of Education immediately. Parents or carers and, where necessary, the police will then be informed, as set out in the missing child procedure, outlined in Appendix 4.
- There are robust procedures for responding to an emergency and for evacuation at every session location, set out in the Fire Safety Policy and Health and Safety Policy.

Screening

Statutory powers to search a learner or their belongings without consent sit with registered schools. At Alma, where there is a safeguarding concern, a learning mentor may ask a learner to voluntarily show the contents of their pockets or bag, and the learner is free to decline. Full details of Alma Education's approach can be found in Alma Education's Behaviour Policy.

Behaviour and Use of Reasonable Force

Alma Education's approach to behaviour management is underpinned by principles of dignity, compassion and fairness, with the aim of promoting positive relationships and de-escalating conflict wherever possible. Alma Education follows in line with updated DfE guidance on restrictive interventions.

In exceptional circumstances, staff may need to use reasonable force to prevent a learners from:

- Hurting themselves or others
- Causing significant damage to property
- Seriously disrupting the learning or safety of others

Reasonable force refers to 'using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances'. It can include a range of actions, such as:

- Physically interposing between learners
- Standing in the way of a learners
- Leading a learners by the arm away from a situation
- In extreme cases, holding a learners to prevent harm

Key principles:

- Any use of force must be proportionate to the risk presented and be in the best interests of the child.
- Staff must always try to use de-escalation strategies first.
- Force must never be used as a punishment.

Staff may use reasonable force to prevent learners from harming themselves or others, from damaging property or from causing disorder. This should always be a last resort, used proportionately, and in line with statutory guidance from the DfE and local authority protocols. Any use of reasonable force must take account of individual learners needs, particularly for those with SEND or a history of trauma. Staff should refer to Alma Education's Behaviour Policy and Reasonable force in schools Policy for further guidance. Incidents involving reasonable force must be recorded and reported to the DSL, and parents should be informed as soon as reasonably possible.

Additional Considerations for Vulnerable Learners

Alma Education recognises that the use of physical intervention may pose particular risks for learners with:

- SEND or medical needs (including sensory or physical difficulties and allergy conditions)
- Communication challenges or trauma histories, and
- Mental health needs or emotional regulation difficulties.

In line with Keeping Children Safe in Education 2026, staff must take extra care when considering the use of force with these learners. Reasonable adjustments must be made to reflect learners' individual needs and vulnerabilities. For learners with EHCPs, medical plans, or behaviour support plans, staff will follow bespoke strategies for crisis management and regulation, and in line with supporting learners at school with medical conditions.

6. Confidentiality

> *"Information sharing is vital to safeguarding and promoting the welfare of children. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children."*
>
> *Working Together to Safeguard Children, HM Government*

Alma Education's Data Privacy policy is available as a separate document and outlines how personal data may be shared. In respect of safeguarding, it is important to recognise 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 young people.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping young people 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 young person at risk.
- Staff should never promise a young person that they will not tell anyone about a report of abuse, as this may not be in the young person's best interests.
- The government's information sharing advice for safeguarding practitioners includes 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, they should speak to the DSL (or deputy).
- Confidentiality is also addressed in this policy with respect to record-keeping in Section 11, and allegations of abuse against staff in Appendix 3.

Use of Images

At Alma Education we will:

- seek learners' consent and parental consent for photographs to be taken or published (for example, on our website, X or Instagram accounts, or in newspapers or publications, for teaching and learning purposes, or for posterity)
- use only the learners's first name with an image
- ensure that learners are appropriately dressed
- encourage learners to tell us if they are worried about any photographs that are taken of them
- ensure that learners do not take photographs or video images of other students without their express permission and the permission of a member of staff.

There is a policy for remote learning that demonstrates on understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely.

7. Recognising Abuse and Taking Action

Staff, volunteers and Advisory Board members must follow the procedures set out below in the event of a safeguarding issue.

Significant Harm

> *"A good child protection system should be concerned with a child's journey through the system from needing to receiving help, keeping a clear focus on children's best interests throughout."*
>
> *Professor Eileen Munro, The Munro Review of Child Protection*

Act immediately

If a young person is in immediate danger, call 999. Do not wait to consult a manager or complete paperwork first.

If a young person is suffering or likely to suffer significant harm, or is in immediate danger, tell the DSL, or the deputy DSL if the DSL is not available, who will make a referral to children's social care and/or the police immediately. Anyone can make a referral.

The DSL will make a referral through telephoning the Wirral Integrated Front Door.

Mon - Fri, 9.00am - 5.000pm - 0151 606 2008
Outside of these hours - 0151 677 6557
Email - mailto:IFD@wirral.gov.uk

The DSL will then complete the referral through submission of an e-MARF (electronic multi-agency referral form), which should be completed within 24 hours of making a telephone referral.

Dealing with Disclosures

If a learner discloses abuse

Stay calm, listen, do not promise confidentiality, and report to the DSL the same day. Never investigate or ask leading questions yourself.

If a young person 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.
- Understand that it must be hard for young person to disclose this to you and seek to build their trust.
- Stay calm and do not show that you are shocked or upset.
- Tell the young person they have done the right thing in telling you.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep the information a secret or to yourself.
- Safeguarding issues can manifest themselves via child-on-child abuse. This may include but not limited to: bullying (including cyber bullying), gender-based violence, teenage relationship abuse, sexual harassment, sexual violence and assaults, harmful sexual behaviours and sexting. Staff should recognise that young people can abuse their peers and family members.
- Write up your conversation as soon as possible in the young person's own words and record in full. Stick to the facts, and do not record your own judgments.
- Once recorded on THE ELECTRONIC RECORDING SYSTEM, check the date and time fields are accurate, and assign the incident to the DSL only. Alternatively, if appropriate, make a referral to young children's social care and/or the police directly (see Section 7.1) and tell the DSL as soon as possible that you have done so.

Pastoral Concerns

Rationale

Alma Education recognises that pastoral care and safeguarding are closely interlinked. Whilst not all pastoral concerns indicate abuse or immediate risk of harm, minor worries or 'nagging concerns' about a child's wellbeing can, if left unaddressed, grow into more serious problems. Our staff must therefore remain vigilant and respond proactively to any changes or signs of distress in a learners's life.

What is a Pastoral Concern?

A pastoral concern can be any emotional, social or personal issue that may affect a learners's wellbeing or behaviour. Unlike clear-cut child protection incidents (e.g. disclosure of abuse), pastoral concerns often manifest gradually and can appear low-level. Examples might include:

- Emotional: Persistent sadness, sudden mood swings, tearfulness, withdrawal from peers, signs of anxiety or low self-esteem.
- Behavioural: Noticeable drop in engagement, aggressiveness, unusual risk-taking or attention-seeking behaviour, being unusually quiet or over-compliant.
- Social: Friendship difficulties, isolation or exclusion from peer groups, concerning changes in peer relationships, rumours of bullying.

- Physical/Presentation: Neglect of personal hygiene, uncharacteristic weight change, excessive tiredness, or non-specific physical complaints.
- Academic: Dramatic shift in academic performance, frequent non-completion of homework, lateness, or unexplained absences that may indicate deeper problems.

Responding to Pastoral Concerns

Initial Identification

Any staff member may notice a pastoral concern. Staff should record the concern as a pastoral concern. If immediate pastoral support is warranted, the staff member should inform the Director of Education or the DSL.

Pastoral Support

Alma Education's pastoral team will explore possible causes, speak to the learners, and, where appropriate, contact parents/carers to build a fuller understanding of the situation.

Early interventions may include:

- Mentoring or counselling sessions
- Adjustments in class seating/activities
- Peer mediation (if conflict among learners is contributing)
- Recommendations for external services (e.g., mental health resources)

Thresholds and Escalation

Low-level concerns can be warning signs of more serious issues e.g., emotional abuse, domestic conflict, self-harm risk, so staff must remain open-minded.

If, at any point, the concern appears to indicate actual or potential risk of harm, staff must escalate to the DSL or deputy DSL immediately, in line with Section 7.1 (Recognising Abuse and Taking Action).

Pastoral staff should maintain ongoing communication with the DSL, who will decide whether a referral to external agencies (children's social care, CAMHS, police) is needed.

Monitoring and Review

The pastoral team and DSL will review pastoral logs (e.g. system entries) to identify patterns or concerning trends, such as multiple low-level notes over time that, collectively, point to neglect, bullying or emotional abuse.

Learners receiving pastoral support should have their progress and wellbeing regularly monitored and documented.

When Pastoral Concerns Become Safeguarding Concerns

Some learners may initially present with low-level difficulties (e.g. changes in behaviour or frequent unexplained absences) that don't immediately suggest abuse or harm. However, over time, these might signal underlying problems such as neglect, emotional abuse, exploitation or grooming.

Where staff observe a pattern or escalation, for example, repeated expression of self-harm thoughts, sudden fear of going home, or references to domestic arguments, the concern should be escalated to the DSL without delay.

All staff are reminded to 'think the unthinkable' & 'It could happen here'. Even seemingly small pastoral concerns may be an indicator of safeguarding risk. Early reporting is essential, when unsure, seek support and record.

Supporting Learners and Families

Alma Education recognises that early dialogue with parents/carers and Family & early help services can often prevent minor issues from becoming more serious.

Where appropriate and safe, the pastoral team will engage parents in supportive conversation, signpost local services and explore strategies that address the learners's difficulties.

Staff will take particular care to distinguish between current safeguarding concerns and historic information to ensure past issues are presented with appropriate context.

Alma Education will adopt a child-centred approach, respecting the child's wishes and feelings, and ensuring they understand that caring adults are ready to listen and help.

By proactively addressing pastoral concerns, Alma Education aims to cultivate an environment where all learners feel supported, understood and safe. Staff at every level play a vital role in identifying the early signs of difficulty and ensuring these concerns do not escalate into serious safeguarding issues.

FGM and Breast Ironing

Female Genital Mutilation (FGM) involves cutting and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation. The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq. Possible indicators that a learners has already been subjected to FGM, and factors that suggest a learners may be at risk, are set out in Appendix 4.

Breast ironing (also known as breast flattening) is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or to disappear. Usually carried out by mothers on their daughters to protect them from rape and sexual harassment. In certain African cultures, men believe that as soon as a girl has breasts, she is ready to have sexual relationships. There have been incidents of this happening in the UK, you may notice an unwillingness to get changed for PE, pain when moving or a flattened breast area.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is still legal. Professionals have a mandatory duty to report such offences to the police.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a learners under the age of 18 years must immediately report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a learners under the age of 18 years must speak to the DSL and follow our local safeguarding procedures.

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

Any member of staff who suspects a learners is at risk of FGM or suspects that FGM has been carried out or discovers that a learners aged 18 or over appears to have been a victim of FGM, must speak to the DSL and follow local safeguarding procedures.

Referral to L.A. Children's Services

If any agency becomes aware of a young person who may have been subjected to or is at risk of FGM they must make a referral to Children's Specialist Services by contacting the Integrated Front Door (0151 606 2008).

Suspicions may arise in a number of ways that a young person is being prepared for FGM to take place abroad.

All professionals need to consider whether any other indicators exist that FGM may have or has already taken place, for example:

- Preparations are being made to take a long holiday - arranging vaccinations or planning an absence from school.
- The young person has changed in behaviour after a prolonged absence from school.
- The young person has health problems, particularly bladder or menstrual problems.

There may be older women in the family who have already had the procedure, and this may prompt concern as to the potential risk of harm to other female young people in the same family. Younger female siblings must also be considered. Any girl withdrawn from PSHE (Flourish) may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

On receipt of a referral, a strategy meeting must be convened as soon as practicable (and in any case within two working days), and should involve representatives from the police, Children's Specialist Services, education professionals, and health services.

The Strategy Meeting must first establish whether the parents or girl has had access to information about the harmful aspects of FGM and the law in the UK. If not, they should be given appropriate information regarding the law and harmful consequences of FGM.

Where a girl has already undergone FGM, a second strategy meeting should take place within ten working days of the referral. This meeting must evaluate the information collected in the enquiry and recommend

whether a child protection conference is necessary to make a decision about whether the girl continues to be suffering or likely to suffer significant harm and needs further protection, and possibly to agree a child protection plan.
A girl who has already undergone FGM should not normally be subject to a child protection conference or be included on the child protection register unless additional child protection concerns exist. However, she should be offered counselling and medical help, and consideration should be given to any other female siblings at risk.
Children's Specialist Services will liaise with the Paediatric services where it is believed that FGM has already taken place to ensure that a Medical Assessment takes place in line with supporting learners at school with medical conditions.

It should be remembered that this is a one-off act of abuse to a young person, although it will have lifelong consequences, and can be highly dangerous at the time of the procedure and directly afterwards.

Liaison with Merseyside Police

Children's Specialist Services will refer the matter to Merseyside Police Protecting Vulnerable Persons Unit, who will participate in the investigation and consult with the Forensic Medical Examiner.

Assessment

Children's Specialist Services in consultation with the Police will undertake a Section 47 Enquiry if it has reason to believe that a young person is likely to suffer or has suffered FGM.

Where a young person has been identified as suffering or likely to suffer significant harm, it may not always be appropriate to remove the young person from an otherwise loving family environment. Parents and carers may genuinely believe that it is in the girl's best interest to conform to their prevailing custom. The preferred outcome for the young person is that the family agree to halt the process. Therefore, the main emphasis of work in cases of actual or threatened FGM should be through education and persuasion.

Where a young person appears to be in immediate danger of mutilation, legal advice should be sought and consideration should be given, for example, to seeking an Emergency Protection Order or a Prohibited Steps Order, making it clear to the family that they will be breaking the law if they arrange for the young person to have the procedure.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Examples of mental health problems that may develop into safeguarding concerns, including self-harm, suicidal ideation, eating disorders and risk of suicide

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, including significant changes in behaviour, difficulty sleeping and physical signs of self-harm

Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that staff are aware of how these young people's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken and reported to the DSL or a deputy. Information on mental health interventions on offer are safe, effective and appropriate for the child's needs, including local referral routes for specialist mental health support, including calling 999 or taking the child to A&E if they're in immediate danger

The Department for Education has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools . In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Better Health - every mind matters.

Ongoing staff training highlights mental health as part of safeguarding. The DSL/Deputy DSL brief staff on steps they should take if they feel that a child is in danger.

Online Safety

Rationale and Context

Alma Education recognises that technology is a significant component in many safeguarding and wellbeing issues, and that learners are at risk of abuse and other harms both online and offline. Alma Education's online safety provision aims to comply with the Online Safety Act and ensure that:

- Staff and learners understand the risks associated with the online environment.
- There is a robust approach to filtering, monitoring and using technology safely, which is reviewed annually.
- Learners, staff and parents are empowered to report online safety concerns promptly.

Alma Education provides age-appropriate education and training on how to stay safe online, and to protect under-18s from harmful online content. This includes content relating to:

- Pornography, sharing images, deepfakes, and misogynistic influencers
- Self-harm, suicide and suicidal ideation content
- eating disorder content
- Generative AI and education

This section should be read in conjunction with Alma Education's:

- IT Acceptable Use (AUP) policies.
- Staff Code of Conduct, addressing the use of social media and electronic communications.
- Anti-Bullying and Behaviour for Learning policies (including cyberbullying and harassment).
- Mobile Phone Policy
- AI usage Policy

As well as DfE's Mobile phones in schools' policy , which outlines the implementation of a policy whereby learners don't have access to their mobile phone during Alma Education day.

Roles and Responsibilities

Advisory Board

- Oversees that Alma Education has appropriate policies and procedures related to online safety, filtering and monitoring, in line with Keeping Children Safe in Education (KCSIE).
- Ensures regular reviews of the effectiveness of Alma Education's filtering and monitoring systems.

Director of Education

- Ensures that adequate staffing, resources and training are in place to maintain robust online safety practices.
- Ensures that all staff understand their responsibility to keep learners safe online.

Designated Safeguarding Lead (DSL)

- Takes lead responsibility for online safety, with a working knowledge of Alma Education's filtering and monitoring arrangements.
- Receives alerts from Alma Education's monitoring software and responds to any concerns in line with the Child Protection-Safeguarding Policy.
- Liaises with external partners (e.g. local authority, police, and online safety organisations) where online risks or crimes are suspected.

All Staff

- Maintain an appropriate level of professional curiosity about learners' online activities.
- Report any suspicious or concerning activity or behaviour immediately to the DSL.
- Adhere to the Staff Code of Conduct, ensuring boundaries are not blurred when communicating online with learners.

Mobile Phones and Cameras

- Staff are allowed to bring their personal phones for their own use but will not use them during a session, as per Alma Education's policy. Staff members' personal phones remain out of use during contact time with learners.
- Staff will not take pictures or recordings of learners on their personal phones or cameras.
- We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in Alma Education.

Filtering and Monitoring

In line with KCSIE 2026, the Advisory Board ensures that appropriate filtering and monitoring arrangements are in place to safeguard children from harmful content online. This includes regular review of IT protocols, AI-related risks, and remote learning provisions.

These systems are regularly checked to ensure they remain fit for purpose and respond effectively to emerging threats, in line with the DfE filtering and monitoring standards.

The DSL (or a deputy) monitors logs and alerts generated by the software and responds in line with safeguarding procedures if any child is at risk.

There is an annual review process undertaken by the Director of Education with the Advisory Board, including to ensure that filtering and monitoring is effective from a technical perspective.

Education and Training

Learners - Receive age-appropriate teaching about online safety through the curriculum, Pol-Ed, Relationships, Health, Sex Education (RHSE), computing lessons and pastoral sessions. Programmes covering online harms such as sharing images, deepfakes, pornography and misogynistic influencers, and when and where to seek help will be delivered, as well as safe online communication, cyberbullying, privacy settings, grooming and radicalisation. Topics will also include age verification to access cyberflashing, epilepsy trolling and encouraging serious self-harm. Learners are guided on where and how to seek help if they feel uncomfortable or threatened online.

Staff - Undertake regular (at least annually) online safety training to ensure they are aware of current risks, digital trends and how best to respond to concerns. Staff are trained to recognise the indicators of child-on-child online abuse, sexting or online grooming, and supporting to understand how they can overlap with other safeguarding concerns (e.g. Child Sexual and Criminal Exploitation, radicalisation, incidents may involve serious physical assault and harm, or threat of harm with a weapon). There is an acknowledgement that it is a safeguarding issue for both the victim and the alleged perpetrator and that timely, evidence-based support can be key for prevention

Parents/Carers - Alma Education offers advice and guidance to parents/carers on keeping their children safe online, including recommended parental controls, privacy settings and managing social media use.

Parents/carers are encouraged to report concerns relating to online safety and to work in partnership with Alma Education to address incidents.

Responding to Online Safety Incidents

Any staff member who suspects or is alerted to an online safety incident must document the concerns and report them to the DSL or deputy DSL immediately. Where a learners is found to have excessively or persistently accessed harmful or inappropriate content, the DSL will discuss this with them and their parents/carers to explore the underlying reasons and provide pastoral or external support if necessary.

For incidents involving potential or actual criminal activity (e.g. child sexual abuse material, grooming, hate crimes), the DSL will immediately liaise with the police and/or local authority children's social care

as required. The DSL should be familiar with the guidance regarding online safety incidents, including that from the UK council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people. Learners who commit child-on-child online abuse will be managed under the behaviour and anti-bullying policies, in addition to any safeguarding and/or criminal pathways.

Centre of Expertise on Child Sexual Abuse resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. This includes support on communicating with young people, their parents / carers, signs and indicators, safety planning and a whole setting approach

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Offences under the Computer Misuse Act 1990 (CMA) have risen substantially and Alma Education recognises that young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications.

The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. Cyber-dependent crimes include: • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded, • 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and • making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme.

Remote Learning and Devices

When delivering remote learning (e.g. in cases of health-related absence or other contingencies), Alma Education will ensure that safeguarding measures continue to apply online.

Staff and learners must adhere to Alma Education's Remote Learning Policy, which outlines expectations for respectful communication, data protection and child protection during online lessons. The DfE guidance on remote learning will be implemented.

The use of personal devices by staff and learners is governed by the relevant acceptable use agreements and staff must ensure that no child is put at risk when using personal equipment or online platforms.

School-issued devices are filtered and monitored by a filtering firewall system and monitoring platform.

Learners are explicitly taught about how to stay safe, including on their own personal devices. This is built into sessions, as well as through other means such as the static wallpaper on all Alma-provided devices.

Artificial Intelligence

Artificial Intelligence has the power to transform education by helping learning mentors focus on what they do best: teaching. This marks a shift in how technology is used to enhance lives and tap into the vast potential of AI in learning. Alma Education looks to consider the risks and challenges alongside the opportunities and benefits, and will continue to work to ensure the safety and reliability of technology, including AI tools, to support staff and learners. The guidance below supports the assessment of risk:

- https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education
- Resources for schools and education settings - https://www.gov.uk/government/collections/using-ai-in-education-settings-support-materials

Review

The Director of Education, in consultation with the DSL and the Advisory Board, will regularly review online safety provisions. The policy and practices will be updated in response to emerging technologies, evolving threats and updates to national guidance (including KCSIE and Working Together to Safeguard Children).

Advisory Board oversight ensures that the effectiveness of Alma Education's approach to online safety is monitored and that the policy remains fit for purpose.

Family Help

Staff should be especially alert to the potential need for Family help (previously early help) for learners & families who are: disabled or have specific health needs / Have SEND (with or without an EHCP) / Are at risk of criminal exploitation or County Lines / Are frequently missing from home or education / Are at risk of modern slavery, , trafficking or sexual exploitation / Are in families experiencing domestic abuse, adult mental health or substance misuse / Are privately fostered or affected by imprisonment of a parent / Are at risk of radicalisation or so-called 'honour'-based abuse / Are young carers*

If family help is appropriate, the DSL will liaise with other agencies in setting up a multi-agency assessment. Staff may be required to support other agencies and professionals in contributing to an assessment, and the DSL may be required to act as the lead practitioner. DSLs understand the assessment process for providing Family Help and support staff to assist. *Alma Education team are alert to young carers' needs and recognise that caring responsibilities can impact on attendance, attainment, behaviour and wellbeing, and that early identification is essential to make sure young carers receive support. The DSL will closely monitor the case and Alma Education will consider a referral to the Integrated Front Door (0151 606 2008) if the situation does not seem to be improving. Details and timelines of interventions will be monitored and reviewed by the DSL through monitoring cases closely.

If the professional identifies the need at level three of the threshold, they should look to submit an Request for Service form to the Family Help team at earlyhelpteam@wirral.gcsx.gov.uk indicating the level of need and intervention. The referral should always be discussed with the young person and family, with their consent clearly indicated on the form. If consent is not given, the team will look to refer if the risk is assessed as a safeguarding concern.

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 a team member 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 decide if a referral is needed and what course of action to take and will let Alma Education know the outcome. The DSL will follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the young person's situation does not seem to be improving after the referral, or there is a threshold disagreement, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the young person's situation improves.

Where there are disagreements with external agencies about thresholds, decision-making or safeguarding responses, the DSL will initiate the WSCP Multi-Agency Escalation Procedure. Wirral escalation procedures can be found in the multi-agency escalation procedure section of the WSCP website.

Extremism

If a young person is not suffering or likely to suffer from harm, or in immediate danger, where possible first speak to the DSL 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 the Director of Education if the DSL is unavailable. Seek advice from the Integrated Front Door (0151 606 2008). Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team via the Integrated Front Door.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff and Advisory Board members can call to raise concerns about extremism with respect to a learners. You can also email 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 or may be planning to travel to join an extremist group
- See, hear or are told something that may be terrorist-related.

Wirral Safeguarding Children Partnership

Actions to take when there are safeguarding concerns about a child

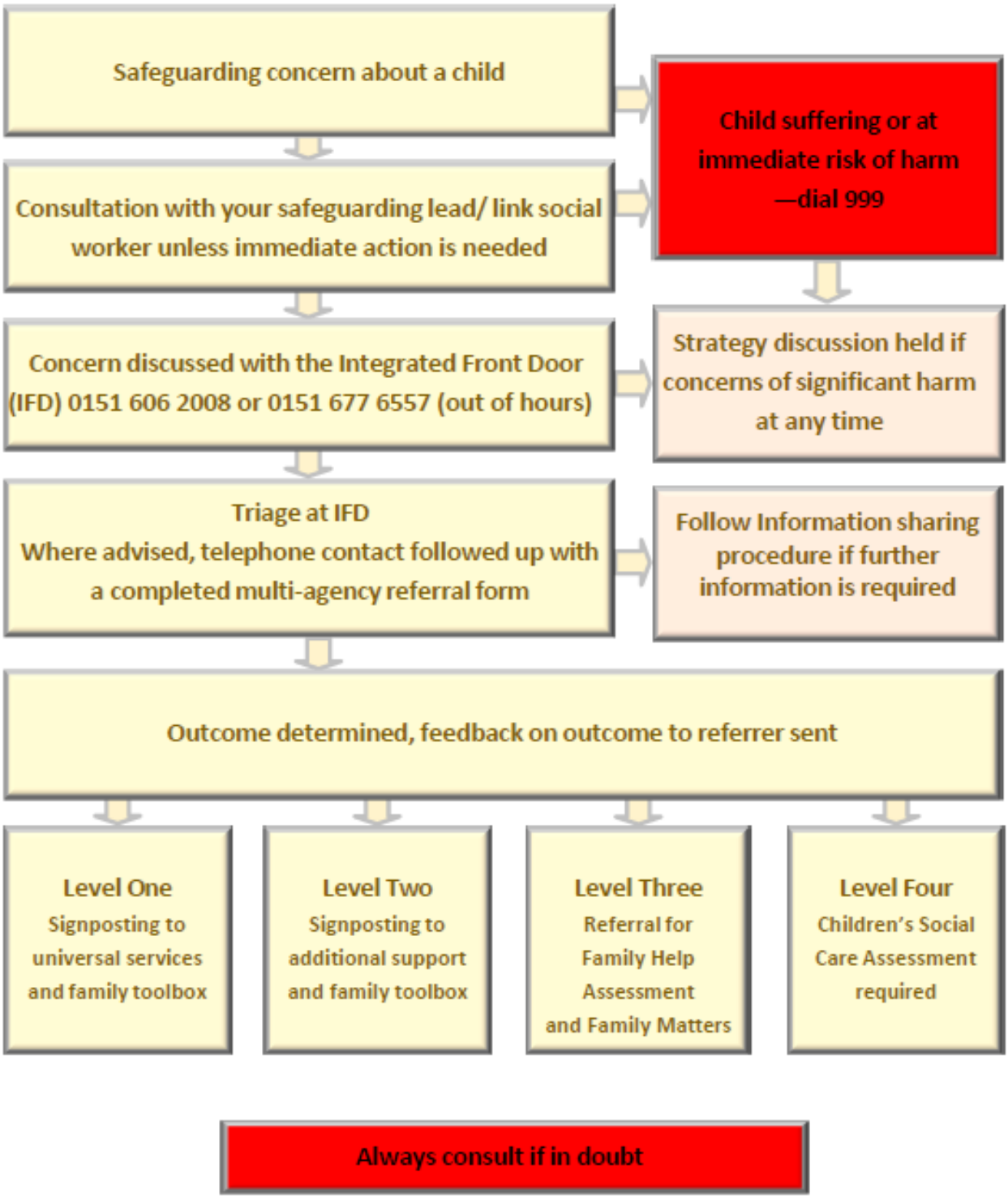
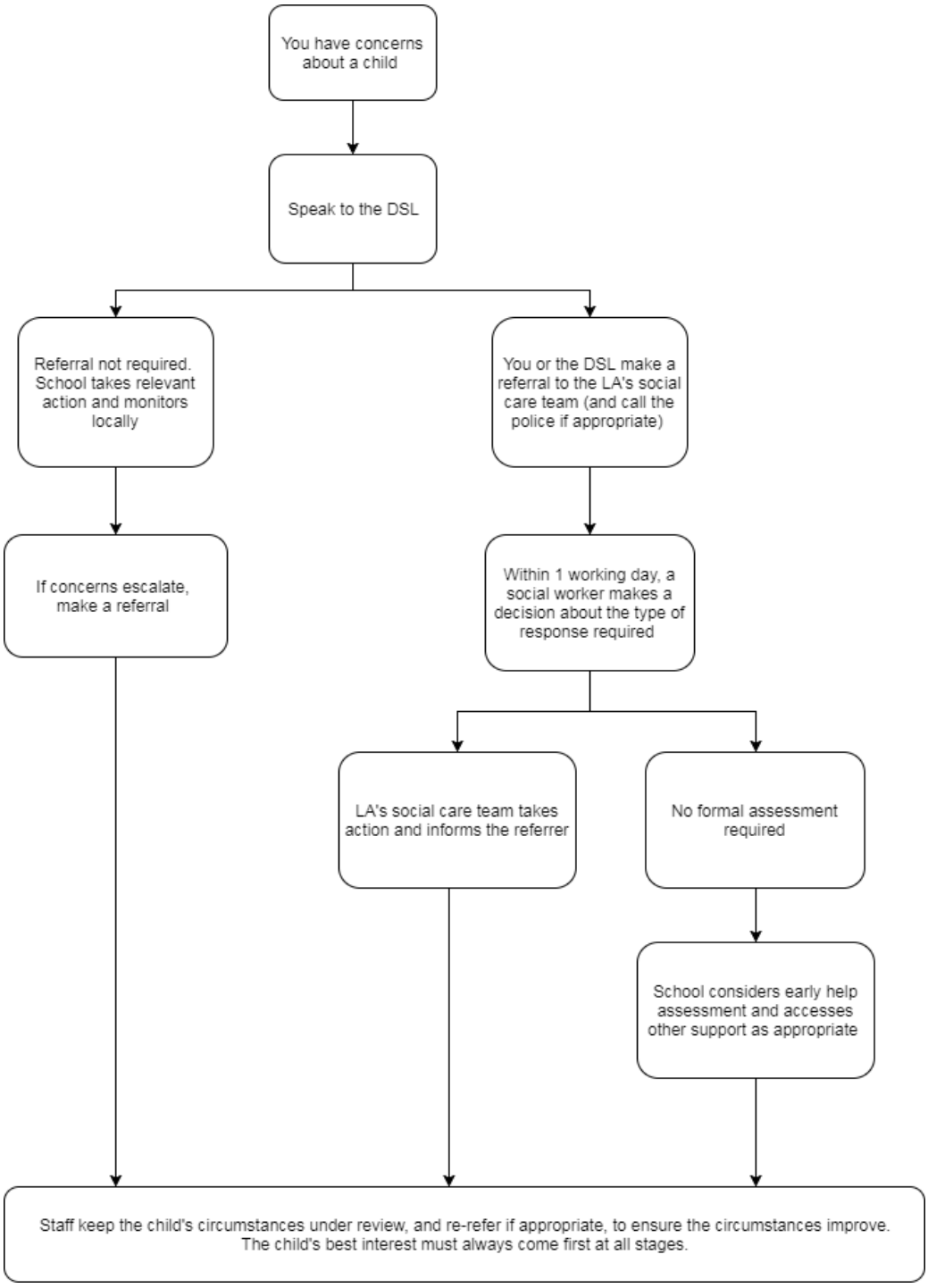


Figure 1: procedure if you have concerns about a young person's welfare (as opposed to believing a young person is suffering or likely to suffer from harm, or in immediate danger)

Child abuse concerns: guide for practitioners - GOV.UK

(Note: if the DSL is unavailable, this should not delay action. See section 7.4.1 for what to do.)



Concerns about a Staff Member or Volunteer

If you have concerns about a member of staff (including supply staff) or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to young people, speak to the Director of Education / Director of Education. If the concerns/allegations are about the Director of Education / Director of Education, speak to the Chair of Advisory Board members.

The Director of Education / Director of Education/Chair of Advisory Board members will then follow the procedures set out in Appendix 3, if appropriate.

All allegations made about a staff member or anyone in a position of trust must be referred to the Local Authority Designated Officer (LADO) within 24 hours. The LADO for Wirral is Kevin Dykes. LADO can be contacted via email safeguardingunit@wirral.gov.uk. A referral form is available to complete - LADO Allegations - Wirral Safeguarding Children Partnership

Staff are encouraged to self-refer where they feel they may have acted in a way that could be misinterpreted or have breached professional boundaries.

Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of Alma 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 harm threshold (i.e. does not indicate a risk of significant harm to a child or warrant an immediate referral to the LADO).

Concerns often cause a sense of unease or a "nagging doubt", and can include conduct that is seemingly minor yet, when left unaddressed, could lead to an erosion of professional boundaries or a culture where more serious misconduct or abuse could go unchallenged.

Examples might include (but not exhaustive):

- Being over-friendly with learners (e.g. having personal social media contact, meeting socially outside of school unless approved by Alma Education).
- Having "banter" or using inappropriate language with children that could be seen to cross professional boundaries.
- Favouritism or singling out a child or group of children for special attention.
- Failing to maintain appropriate physical boundaries (e.g., not adhering to safe-touch guidelines).

Aims of the Low-Level Concerns Process

- Protect children by fostering a culture of vigilance, having the mind set 'it could happen here'.
- Maintain professional standards and uphold the Staff Code of Conduct and Teacher Standards where appropriate.
- Identify patterns of behaviour early, so that staff receive support or corrective action before concerns escalate.

- Encourage openness and the confidence to speak out, ensuring staff feel comfortable reporting concerns of any magnitude.

Reporting Low-Level Concerns

- Self-reporting: Staff are encouraged to self-report, for instance, where they feel they have made a slip in conduct or sense that their behaviour may have been misinterpreted.
- Reporting about others: Any member of staff, volunteer or contractor who has a low-level concern about another adult's conduct should share it as soon as possible with the Director of Education / Director of Education (or Chair of Advisory Board members if the concern is about the Director of Education / Director of Education).
- Recording: The person reporting should provide a factual account of what happened, noting the date, time and context. Where the conduct in question is a potential breach of the Staff Code of Conduct, examples or evidence (if any) should be included.
- Staff must never assume that someone else will act. Timely reporting of seemingly minor issues helps maintain the highest safeguarding standards.

Responding to Low-Level Concerns

- The Director of Education / Director of Education (or senior leader/designated manager) will review the reported concern, including speaking to any witnesses if necessary.
- If, upon review, the concern appears to meet the harm threshold, it will be managed as a formal allegation in line with the procedures in Section 7.10 above and referred to the LADO (or police/children's social care, if required).
- If it does not meet the harm threshold, the Director of Education / Director of Education will handle the matter proportionately and confidentially at an appropriate management level.
- This may involve additional supervision, training, reflective conversation or guidance to the person about whom the concern is raised.
- Any patterns or recurring issues identified in the individual's record may indicate the need for further investigation or action.

Recording and retention of low-level concerns

All low-level concerns must be recorded in writing, with the details of the concern, the context and the outcome.

Records will be stored securely and, where they do not meet the harm threshold, will typically be retained for as long as the staff member remains in Alma Education's employment (or as advised by current safeguarding retention guidelines).

Alma Education will regularly review any low-level concerns to detect potential patterns of concerning behaviour. Where a pattern is identified, Alma Education will consider a referral to the LADO and/or the initiation of disciplinary proceedings.

Transparency and culture of openness

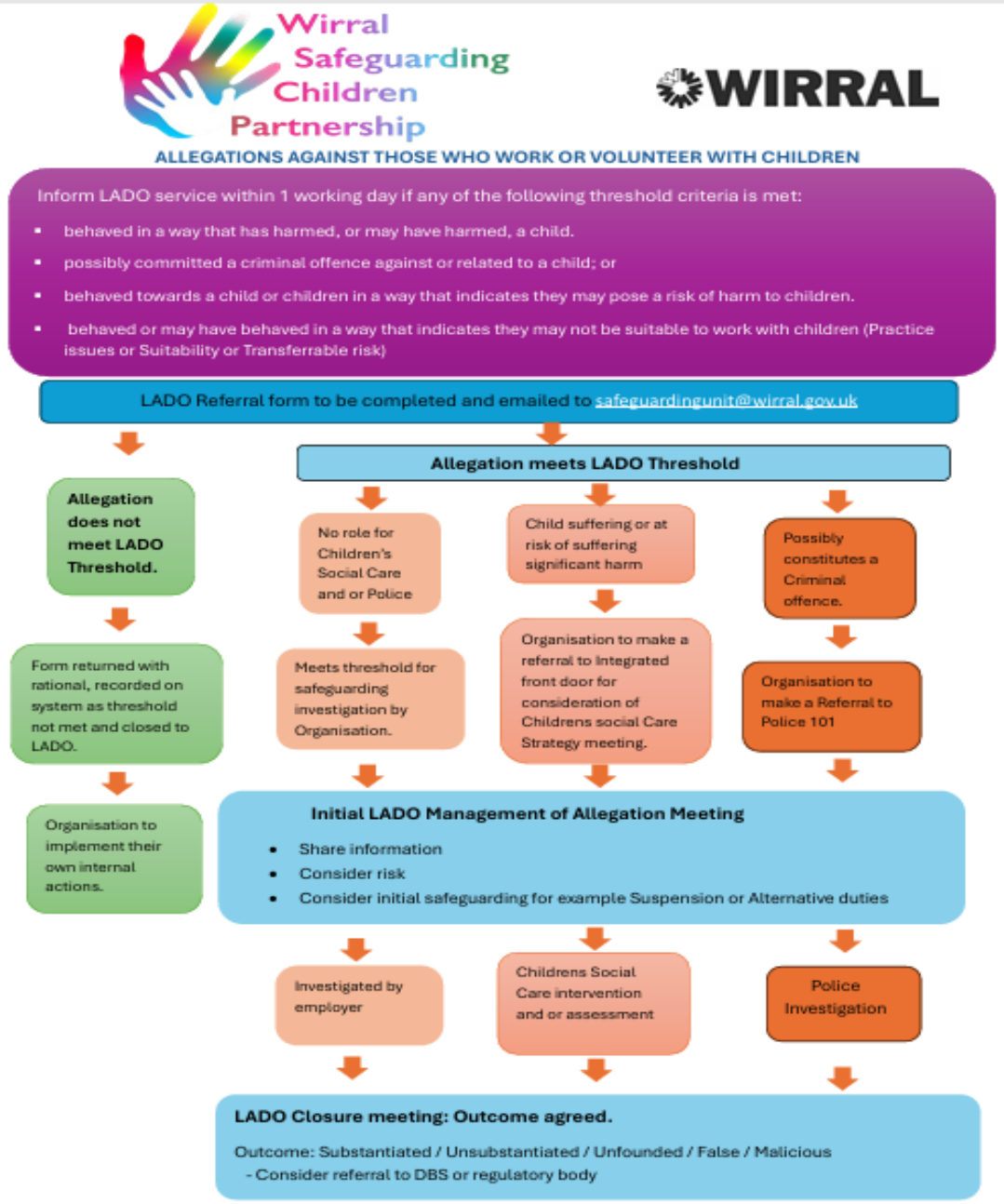
Alma Education fosters a culture of honesty, openness and transparency.

All staff should be aware that raising low-level concerns protects learners from harm and helps maintain professional standards.

Staff who raise low-level concerns in good faith will not face reprisal. They will be supported.

If staff have any doubts or questions about whether an incident or behaviour constitutes a "low-level concern" or a more serious matter, they should consult the Director of Education / Director of Education immediately for guidance.

Figure 2: Wirral procedures for allegations made against staff and volunteers.



Allegations of Abuse Made Against Other Learners

We recognise that young people are capable of abusing their peers. This occurs when a young person intentionally threatens, harms or causes distress to another young person. We also recognise that child-on-child sexual abuse can occur between two young people of any sex and/or age. Abuse will never be tolerated or passed off as "banter" or "part of growing up" as this can lead to a culture of unacceptable behaviour and an unsafe environment. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of learners hurting other learners will be dealt with under Alma Education 's Behaviour policy, and the Safeguarding and Child Protection 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 learners at risk
- is violent
- involves learners 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 sexting)

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

- You must record all allegation and tell Director of Education (and DSL where appropriate), but do not attempt to investigate.
- The DSL will contact the Integrated Front Door and follow advice received, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all young people involved (including the victim(s), the young people against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the children and young people mental health services (CYPMHS), if appropriate.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Ensuring our curriculum helps to educate learners about appropriate behaviour and consent.
- Ensuring learners know they can discuss any concerns or worries that they may have by speaking to their learning mentor or the Director of Education.
- Ensuring staff are trained to understand that a learners harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy.

Staff should refer to the WSCP 7-minute briefing for a concise summary of approaches to child-on-child abuse.

Sexual Violence and Sexting

Respond without delay

Any report of sexual violence or sexting between learners must be taken seriously and referred to the DSL immediately. Never dismiss such reports as "banter" or normal behaviour.

Sexual violence and harassment may or may not happen simultaneously and can occur both on and offline. They can happen between individuals or groups of learners and will not be tolerated in any form. Those with SEND or those who are identify as LGBTQ+ may be particularly susceptible to such behaviours.

Department for Education guidelines with regards to the management of sexual violence and harassment between young people at school can be found in the publication, Review of sexual abuse in schools and colleges - GOV.UK

The guidance covers what sexual violence and harassment is, schools' and colleges' legal responsibilities, a whole school approach to safeguarding and child protection and how to respond to reports of sexual violence and sexual harassment. All such incidents should be immediately reported to the DSL and managed in line with this policy. Victims of harm will be supported by Alma Education's pastoral system.

There is a bespoke helpline for young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. The NSPCC helpline Report Abuse in Education can be contacted by phoning 0800 136 663 or by emailing help@nspcc.org.uk.

Harmful Sexual Behaviours (HSBs)

Harmful sexual behaviours refer to problematic, abusive and violent sexual behaviours which are developmentally inappropriate. HSBs exist on a progressive continuum, starting from harmful sexual behaviour and, if learners are not supported, through to sexual harassment and sexual violence. Alma staff are aware of the importance of:

- Recognising the escalatory nature of misogyny and the benefits of early identification to support the minimising the risk of HSB to escalate into sexual harassment and sexual violence
- Taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they're consensual or non-consensual
- Acknowledging Sexual behaviour between young people with an age gap could be considered harmful.

For more information, see Harmful Sexual Behaviours.

Technology Assisted Harmful Sexual Behaviours (TA-HSB)

Technology-assisted harmful sexual behaviour (TA-HSB) refers to children or young people using digital devices to engage in sexual activity that is harmful, abusive, or developmentally inappropriate for them or others. It spans a wide spectrum, ranging from sharing self-produced images and sextortion to online grooming and the viewing of extreme pornography.

Types of TA-HSBTA-HSB involves both self-directed harms (such as inappropriate use of pornography or risky digital exploration) and behaviours that directly victimize or abuse others. Common examples include:

Image-Based Sexual Abuse (IBSA) / 'Revenge Pornography' - Non-consensual sharing or distribution of intimate, self-produced, or manipulated images.

Sextortion & Coercion: forcing or pressuring someone to engage in sexual acts or send explicit materials by threatening to publish existing sexual content.

Grooming & Online Solicitation - Using the internet to befriend younger children or peers for the purpose of sexual exploitation.

Sexual Harassment & Bullying - Using online messaging, social media, or "deepfake" technology to degrade, embarrass, or sexually target individuals

Professionals typically evaluate these behaviours on a continuum of sexualised behaviour ranging from normal or developmentally appropriate exploration to abusive and violent acts. To identify whether a behaviour requires intervention, it is essential to consider:

Context - The level of coercion or the emotional distress of the victim. Developmental Stage - whether the action is appropriate for the chronological and developmental age of the youth. Consent & Power Dynamics - the presence of power imbalances, such as age gaps or the threat of reputational harm.

Wirral Youth Justice Service and the Wirral Safeguarding Children Partnership developed a multi-agency identification tool to determine whether a child's digital behaviour crosses into harmful territory, providing clear guidance on how to respond and intervene. Centre of expertise on Child Sexual Abuse offers detailed research and definitions regarding how children engage in TA-HSB and best practices for safeguarding.

Sexting

This approach is based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately. You must not:

- View, download or share the imagery yourself, or ask a learners 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 learners to delete it.

- Ask the learners(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 learners(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

Explain that you need to report the incident and reassure the learners(s) that they will receive support and help from the DSL.

Initial Review Meeting

Following a report of an incident, the DSL may hold an initial review meeting with appropriate staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to learners(s).
- If a referral needs to be made to the police and/or young people's social care.
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed).
- If 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 learners involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents/carers of the learners involved (in most cases parents should be involved).

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

- The incident involves an adult / someone in a position of trust
- 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 need).
- 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, underage learners.
- The DSL has reason to believe a learners 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 Director of Education and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further Review

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, hold interviews with the learners involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a learners has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing Parents

The DSL will 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 learners 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 through the Merseyside Police website. If a learners is deemed to be at risk of immediate harm, the police will be contacted dialling 999.

Recording Incidents

All incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in Section 12 of this policy also apply to recording incidents of sexting.

Curriculum Coverage

Learners are taught about the issues surrounding digital harms as part of the curriculum. Teaching covers the following in relation

- What it is
- How it is most likely to be encountered
- The consequences of online harms
- Issues of legality
- The risk of damage to people's feelings and reputation

Learners also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

8. Parent Engagement

> *"It's all about relationships. You have to know someone to trust them. They must be reliable and be there for you if you are going to be able to talk about the things you don't want to."*
>
> *Parent and family perspective on safeguarding, Children's Commissioner for England*

Where appropriate, we will discuss any concerns about a young person with the young person's parents. The DSL will normally do this in the event of a concerns or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If Alma Education believes that notifying the parents would increase the risk to the young person, we will discuss this with the Local Authority Children's Social Care Team via the Integrated Front Door before doing so.

In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

9. Vulnerable learners

> *"Children with SEND can face additional safeguarding challenges. This can include increased risk of abuse, and difficulty in recognising or reporting abuse."*
>
> *Keeping Children Safe in Education*

The DSL will liaise with the Virtual School Head and local authority to promote educational outcomes for children with a social worker.

SEN and Disability

We recognise that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration.
- Learners being more prone to peer group isolation than other learners.
- The potential for learners with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Staff will be mindful of these challenges and use their knowledge of individual learners to identify potential concerns and escalate these concerns where appropriate to do so.

Children Looked After / Care Experienced Children

The Designated Teacher for Children Looked After / Care experienced children is Alma Education

The term 'looked after' refers to young people who are under 18 and have been provided with care and accommodation by family services. There are three main ways that young people and young people under eighteen years of age become looked after:

- With parental agreement, this is under Section 20 of the Children's Act 1989, which may include short breaks.
- Under a care order from a family court, Section 31 of the Children's Act 1989: when a care order is made, family services acquire parental responsibility and become a legal parent alongside the parent/guardian.

- If a court orders the young person to be remanded into Local Authority accommodation.

Young people may only need to be looked after for a short period of time and then return to their family, but sometimes the arrangement is more permanent. An assessment of needs, which will include the views of the young person and the parents, will be carried out to determine the best course of action for the young person.

After the assessment of the young person and their circumstances has been completed, L.A Children's Services will agree with the family and young person the arrangements for their care.

They are set out in two documents: a care plan and a placement plan.

The Care Plan

A care plan is a structured document that summarises a person's health conditions, goals, treatments, and required interventions, helping caregivers and professionals deliver organised, consistent, care. It typically includes assessment data, expected outcomes and interventions. The care plan is reviewed on a regular basis through regular review meetings chaired by an Independent Reviewing Officer.

The Placement Plan

The placement plan sets out where and with whom the young person will live, looking at any specific arrangements about the placements including travel, and any restrictions that might be placed on the young person while placed with the foster carer for example people they cannot see. The placement plan is completed within five days of a young person being looked after.

Independent Reviewing Officer (IRO)

An Independent Reviewing Officer (IRO) oversees and reviews the care plans of children in care to ensure their welfare, rights, and voices are protected.
The role of the IRO is to:

- Chair the review meetings.
- Meet with the young person on their own to seek their wishes and feelings.
- Monitor the care the young person is receiving.
- Look to resolve any disputes about the review or the young person's care plan.

Looked After Children (LAC) Review Meetings

When a young person is looked after, their situation is regularly reviewed at Looked After Children (LAC) review meetings.
The purpose of these meetings is to:

- look at the young person's care plan,
- make sure that the right arrangements are in place for the young person whilst they are looked after,
- discuss any changes since the last review, and
- consider whether decisions made at the last meeting were acted on.

The first Looked After Children's Review meeting must be held within twenty-eight days of a young person being looked after. The second is held within the next three months and the third and later reviews

are held every six months. LAC review meetings are chaired by an Independent Reviewing Officer (IRO).

The meetings are normally attended by:

- parents/others with parental responsibility for the young person
- the social worker
- the young person
- an advocate or independent visitor
- the foster carer
- the foster carer's supervising social worker
- other professionals may be there too, but it shouldn't be so many that it overwhelms the young person.

Safeguarding Children who are Looked After

Children may enter care for all sorts of reasons. But most enter because they have been abused or neglected. These experiences can leave young people with complex emotional and mental health needs. And this can increase their vulnerability to abuse.

Many young people also move repeatedly in and out of care, or between placements. This can prevent them from forming stable relationships with the adults who could help protect them.

What Works in Safeguarding Young People in Care

No two young people in care are the same. Each young person has their own characteristics and individual needs. But all young people need strong, caring and trusting relationships with those who care for them.

Through talking to looked after young people, the NSPCC has identified six ways the care for young people and the care system can be improved:

- ensure young people's voices are heard
- strengthen the social care work force and improving practice
- promote the right to advocacy
- improve emotional support
- support transitions in and out of care
- improve public understanding of the care system

10. Complaints and Concerns about Alma Education Safeguarding Policies, Procedures and Practice

Complaints Against Staff

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

Other Complaints

Parents and other complainants are encouraged to raise any safeguarding concerns or complaints directly with the DSL so the matter can be resolved as quickly and informally as possible. To contact the DSL, complainants should contact the Director of Education directly. Complainants should not divulge any information when using these contact methods and should simply request contact from the DSL.

The aim is to acknowledge this initial contact within the next 24 hours and following this an appointment will be made for a phone call or meeting with the DSL to take place as soon as possible and by no later than five term time working days after Alma Education's acknowledgment.

The DSL will take the concern or complaint seriously and seek to provide the necessary information. This might require an adjournment of the initial meeting or phone call so that further information can be gathered and then the meeting will be resumed or, if more convenient to the parent, the conversation may be completed with a phone call.

Meeting/conversation content will be logged by the DSL and recorded electronically, to indicate the nature of the concern/complaint, the steps that have been taken to provide a resolution, next steps and that the matter has been resolved, if this is the outcome.

If the matter cannot be resolved, the parents/complainants should follow Alma Education's and Complaints Procedure HYPER LINK so that the Director of Education is able to work to resolve the complaint. Parents or other complainants are usually expected to lodge the written complaint within three months of the expression of initial concern. Although this period will be extended if there are special circumstances.

The Director of Education will seek to:

- Establish the facts i.e. who is involved, what has happened and how has the complaint been addressed to date.
- Clarify the precise nature of the complaint and what is unresolved.
- Meet with the complainant to clarify what they feel needs to be done to resolve the issue(s).
- Interview those concerned to establish all points of view.
- Conduct interviews with an open mind and be prepared to persist in the questioning to ensure that the facts emerge.
- Keep a record of all interviews.

The Director of Education will be responsible for ensuring that a written report of their findings is made to the complainant and that a full record of any investigation, including the original written complaint and the written report is kept on file. This record is confidential to the parent, staff involved in the investigation and the Director of Education.

The Written Report will be accompanied by a letter that explains that if the parent does not feel that the matter has been resolved, a further meeting will be arranged with the Director of Education. This letter, containing the report, will be sent no later than 10 term time working days following the stage one meeting with the parents who lodged the complaint.

If the complaint still remains unresolved, the Chair of Advisory Board members will seek advice from the Wirral Safeguarding Children Partnership.

Whistleblowing

Staff receive specific training on how and when to raise safeguarding or professional conduct concerns, including to external bodies such as the NSPCC whistleblowing helpline by dialling 0800 028 0285 or emailing help@nspcc.org.uk. Alma Education has a whistle-blowing policy which can be viewed as a separate document: Alma Education

Whistle-blowing issues regarding the Director of Education should be raised with the Chair of Advisory Board members.

11. Record-Keeping

All safeguarding and child protection records are held on Alma's electronic recording system, CPOMS

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS.

The DSL will routinely analyse safeguarding records to identify trends, evaluate the impact of interventions, and inform next steps in cases and strategies to improve outcomes for children and young people.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely on CPOMS and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual young people will be retained until their 26th birthday. CPOMS ensures that learners records are deleted after this date. The DSL will ensure that any hard copies of safeguarding documents are securely disposed of after this date.

Child protection files for transferring learners will be securely passed to the receiving school within 5 working days of the transfer (in-year) or within the first 5 days of a new term. The DSL will consider which information in a child protection file should be shared with relevant staff and when it's appropriate to do so. Files will be transferred separately from the main learners file, and confirmation of receipt will be obtained and stored. The DSL is responsible for ensuring timely and secure transfer to support continuity of care and safeguarding oversight. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

Where information indicates a risk to others, (for example where a learner has previously carried, threatened with or used a knife or weapon), Alma Education and the DSL will be responsible for assessing the risk and putting in place a support plan for when the child arrives. In addition:

- Appendix 2 sets out the policy on record-keeping specifically with respect to recruitment and pre-employment checks.

- Appendix 3 sets out the policy on record-keeping with respect to allegations of abuse received against staff.

12. Staff Training & Continuing Professional Development (CPD)

> *"All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates as required, but at least annually."*
>
> *Keeping Children Safe in Education*

All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand Alma Education's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the Wirral Safeguarding Children Partnership.

All staff will have training on the government's anti-radicalisation strategy, Prevent Duty 2023 to enable them to identify young people at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will receive training on online harms, including cybercrime (refers to criminal activity committed using computers and/or the internet), and harm indicators linked to children missing from education (CME). Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually. External safeguarding training (e.g. via WSCP training offer) is expected every 3 years for all staff.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers and Advisory Board members will receive appropriate safeguarding training.

The DSL and Deputies

The DSL and deputies 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 and disseminate the information/training to all staff annually.

The DSL will ensure that safeguarding records are subject to annual audit to monitor consistency, quality and impact. The DSL will also provide the Advisory Board with regular reports summarising key data, trends, training compliance and any policy updates. Alma Education will complete the annual Section 175 safeguarding audit as required by the Wirral Safeguarding Children Partnership.

Advisory Board members

All Advisory Board members receive training on safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Chair of Advisory Board members may be required to act as the 'case manager' if an allegation of abuse is made against the Director of Education, they receive training in managing allegations for this purpose.

Recruitment: Interview Panels

At least one person conducting any interview for a post at Alma Education will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education 2026, and Working Together to Safeguard Children (2026) and will be in line with Wirral safeguarding procedures. Training can be accessed here: Safer Recruitment Training.

Staff who have Contact with Learners and Families

All staff who have contact with young people and families will have supervisions which will provide them with support, coaching and training, promote the interests of young people and allow for confidential discussions of sensitive issues.

13. Monitoring Arrangements

This policy will be reviewed annually by the Director of Education. At every review, it will be approved by the full Advisory Board.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2026.

Appendix 1: Abuse Categories / Types of Harm

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.

- Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others - particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse
- Child protection: is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or where significant harm is suggested.

- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. In line with KCSIE 2026, it may include verbal abuse, such as persistent criticism, belittling or name-calling. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age - or developmentally inappropriate expectations being imposed on children, including interactions beyond a child's developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered. Neglect is the most common reason for a child to be the subject of a child protection plan in the UK; to help combat neglect, the Wirral Safeguarding Children Partnership has published its multi-agency neglect strategy: Cherish - Wirral's Neglect Strategy.

- Physical abuse: a form of abuse which 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.

- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males: women can also commit acts of sexual abuse, as can other children. Most sexual abuse is committed by individuals known to the victim. The sexual abuse of children by other children is a specific safeguarding issue in education, and all staff are aware of it and of Alma Education's policy and procedures for dealing with it (KCSIE 2026).

- Family Help: means providing support as soon as a problem emerges, at any point in a child's life. KCSIE 2026 distinguishes between universal services and community-based early help, the targeted early help level of Family Help (sections 10 and 11 of the Children Act 2004), and statutory services. In Wirral this support is accessed through the WSCP family help arrangements and the Integrated Front Door

- Harm: is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

Appendix 2: Safer Recruitment and DBS Checks: Policy and Procedures

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

New Staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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 will 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, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with young people.

All offers of employment will be subject to the satisfactory completion of the employment checks and suitable references, reflecting legislative changes, specifically the Crime and Policing Act 2026.

Regulated activity means a person who will be:

- Any person volunteering in a role that involves teaching, training, instructing or supervising children frequently, overnight or more than 3 days in a 30-day period.
- Regulated activity includes providing advice or guidance on physical, emotional or educational wellbeing and driving a vehicle only for children

Existing Staff

If there are concerns about an existing member of staff's suitability to work with young people, Alma Education will carry out all the relevant checks as if the individual was a new member of staff. This will also be done if an individual moves from a post that is not regulated activity to one that is.

A referral will be made to the DBS for anyone who has harmed, or poses a risk of harm, to a young person or vulnerable adult where the individual has engaged in relevant conduct, i.e. conduct that:

- endangers a child or is likely to endanger a child;
- if repeated against or in relation to a child would endanger the child or be likely to endanger the child;
- involves sexual material relating to children (including possession of such material);
- involves sexually explicit images depicting violence against human beings (including possession of such images); or
- is of a sexual nature involving a child.

- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a young person 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.

Agency and Third-Party Staff

Written notification will be obtained from any agency or third-party organisation that they have carried out the relevant checks that Alma Education would perform on any individual who will be working at educational setting. In respect of an enhanced DBS check, Alma Education will ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

Identification checks will be made. The person will be expected to produce their current DBS certificate and a form of identification in line with ID checking guidelines.

Contractors

Alma Education will ensure that any contractor, or any employee of the contractor, who is to work at Alma Education has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with young people

Where the contractor does not have opportunity for regular contact with children, Alma Education will decide on whether a basic DBS check would be appropriate. If a person working with Alma Education is self-employed, we will either obtain the DBS check or request to see the certificate, to ensure the DBS check is at the level required.

Will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

Alma Education will ensure that our safeguarding requirements are set out in the contract between the contractor and Alma Education.

Trainee/Student Teachers

Where applicants for initial teacher training are employed, Alma Education will ensure that all necessary checks are carried out.

For fee-funded trainee teachers, written confirmation from the training provider will be sought to ensure that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with young people. The trainee teacher will also be expected to produce their current DBS certificate and a form of identification.

Visitors

Alma Education will have different types of visitors, those with a professional role, for example educational psychologists or social workers, those connected with an Alma hub, children's relatives, or other visitors attending a specific activity.

Alma Education will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Director of Education will exercise professional judgement about the need to escort or supervise visitors during a session.

For visitors there in a professional capacity, Alma Education will check ID and determine whether the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks in line with WSCP's Visitor to Schools Policy.

Volunteers

- An enhanced DBS check with barred list information will be obtained for all volunteers who are working in regulated activity. A person will also be in regulated activity as a

result of their work or volunteering, they: will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Alma Education will follow the requirements for DBS checks for volunteers in regulated activity, set out by the DfE.

Alma Education will obtain an enhanced DBS check (with barred list information) for all volunteers who are working in regulated activity with children, i.e. where they are unsupervised and teach or look after children regularly or provide personal care on a one-off basis.

Existing volunteers do not have to be re-checked if they have already had a DBS check (which should include children's barred list information if engaging in regulated activity). However, if Alma Education has any concerns, it will consider obtaining a new DBS check at the level appropriate to the role.

Advisory Board members

- All Advisory Board members will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- All Advisory Board members will also have a section 128 check, as a section 128 direction disqualifies an individual from taking part in the management of an independent school or alternative provision.

Adults who Supervise Learners on Work Experience

When organising work experience, we will ensure that policies and procedures are in place to protect young people from harm. We will consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a learners under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so frequently or for more than three days in a 30-day period, or overnight.
You must not allow someone on the barred list to take part in regulated activity.

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, Alma Education will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Appendix 3: Allegations of Abuse Made Against Staff / Those in a position of trust

For employees, this Appendix should be read in conjunction with Alma Education's Disciplinary Policy. This section of this policy is about managing cases of concerns/allegations that might indicate a person could pose a risk of harm if they continue to work in their present position, or in any capacity with children in school.

Reference is made to 'allegation/s' for ease. It applies to all cases in which it is alleged that a current member of staff, supply agency staff or volunteer has:

- Behaved in a way that has harmed a young person, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a young person or young people in a way that indicates he or she would pose a risk of harm to children and/or
- Behaved or may have behaved in a way that indicates that he or she would not be suitable to work with children

It applies regardless of whether the alleged conduct/abuse took place in Alma Education. If an allegation relates to conduct outside of school, this is referred to as 'transferable risk'. Allegations against any person who works with young people must be taken seriously. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff, supply staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a young person or other young people 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 Alma Education so that the individual does not have direct contact with the young person or young people concerned.
- Providing an assistant to be present when the individual has contact with young people.
- Redeploying the individual to alternative work in Alma Education so that they do not have unsupervised access to young people.
- Arranging sessions so that the young person or young people do not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

If suspension is required, the staff member will be suspended in accordance with Alma Education's disciplinary policy and procedures.

If suspension is deemed appropriate, the employee will receive a named contact. Reasons for the suspension will be provided within one working day, but complete details may be unavailable to disclose due to the involvement of other authorities/agencies. The case manager and employee will agree the support to be in place during the investigation and communicate the expected timescales and likely course of action. If part of a trade union, the staff member must be advised to contact them. The employee's manager will be informed that they have been suspended whilst an investigation is completed, but no further details will be given.

Definitions for Outcomes of Allegation Investigations used in this Appendix

- 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 or cause harm to the person subject to the allegation.
- 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.

Ultimately, the options open to Alma Education depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future.

Procedure for Dealing with Allegations

In the event of an allegation meeting the criteria in the first paragraph of this Appendix above, the Director of Education (or Chair of the Advisory Board where the Director of Education is the subject of the allegation), referred to here as the 'case manager', will take the following steps:

- Conduct basic enquiries to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example, whether the individual was in Alma Education at the time of the allegations; whether the individual did or could have come into contact with the child; whether there are any witnesses; and whether there is any CCTV footage.
- Immediately discuss the allegation with the designated officer at the local authority (LADO). 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 young people 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).

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with young people at Alma Education 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.
- In relevant cases, inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the 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. Possible outcomes at this stage include:

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. 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 Alma 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 designated officer 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 designated officer to initiate the appropriate action and investigation 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 young person/young people involved about the allegation as soon as possible if they do not already know (following agreement with 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 (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the young person/young people involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- 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 young person, or if the individual otherwise poses a risk of harm to a young person.

If Alma Education is 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 the Advisory Board 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 Alma Education's disciplinary process, should this be required at a later point.

Timescales

The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process.

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will usually be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will usually institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will normally hold this within 15 working days.
- In other cases, the first review should take place no later than four weeks after the initial assessment.

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, considering information provided by the police and/or children's social care services. The options will depend on the circumstances of the case, and the consideration should consider the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Conclusion of a case where the allegation is substantiated

If an allegation that an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child, is substantiated (including cases where the individual is dismissed or Alma Education ceases to use their services, or the individual resigns or otherwise ceases to provide their services), a referral to the DBS must be made. The case manager may discuss this with Alma Education's HR / Business Manager and the local authority's designated officer (LADO).

If the individual concerned is a member of staff, the case manager must consider whether to refer the matter to the Teaching Regulation Agency. Alma Education will consult the Public Sector Equality Duty

(PSED) when considering a referral to the Teaching Regulation Agency when considering prohibiting the individual from teaching and may discuss this with the personnel adviser, HR support and/or local authority's designated officer.

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 can access guidance to support the return to work from HR or the LADO as most people will benefit from help and support after a stressful experience.

The case manager will also consider how best to manage the individual's contact with the young person or young people who made the allegation, if they are still attending Alma Education.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Director of Education, or other appropriate person in the case of an allegation against the Director of Education, will consider whether any disciplinary action is appropriate against the learners(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a learners. If the allegation is determined to be malicious the case manager and LADO should consider whether the young person who has made the allegation needs help or is at risk of abuse. In such circumstances, they may make a referral to social care.

Supply Workers

Supply teachers, whilst not employed by Alma Education, are under the supervision, direction and control of the Advisory Board or Director of Education when working in Alma Education.

Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. Alma Education will usually take the lead because agencies do not have direct access to children or other staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are considered by Alma Education during the investigation.

When using a supply agency, Alma Education will inform the agency of its process for managing allegations but also take account of the agency's policies and the duty placed on agencies to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Confidentiality

Alma Education 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 local authority's designated officer, 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 young person/young people 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. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).
- A copy provided to the person concerned where agreed by children's social care or the police.
- A declaration on whether the information will be referred to in any future reference.

If an allegation or concern is not found to have been malicious, Alma Education will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning Lessons

After any cases where the allegations are *substantiated*, the circumstances of the case will be reviewed with the local authority's designated officer (LADO) to determine whether there are any improvements that we can make to Alma Education's 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. How future investigations of a similar nature could be carried out without suspending the individual will be considered.

Appendix 4: Specific Safeguarding Issues

Children Missing from Education (CME)

A young person going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or young person criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. *All* unexplained absences are a safeguarding concern and will be investigated as part of a supportive approach through Alma Education's Attendance Review Framework.

There are many circumstances where a young person may become missing from education, but some young people are particularly at risk. These include young people who:

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

We will follow our procedures for unauthorised absence and for dealing with young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. Alma Education will send a text to emergency contacts by 09.30am if a learners does not attend without a reason being provided. At least two emergency contacts are held for all learners where possible.

We will inform the local authority if a young person leaves Alma Education without a new school being named and adhering to requirements regarding sharing information with the local authority when removing a young person's name from the admission register at non-standard transition points where applicable.

The Attendance Officer will hold a list of learners for whom there are known safeguarding issues. The DSL will be made aware of these learners' absence as soon as possible in order to take any safeguarding steps which may be needed.

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 young person is suffering from harm or neglect, we will follow child protection procedures as outlined in this policy, including with respect to making reasonable enquiries. We will make an immediate referral to the Integrated Front Door, and the police, if the young person is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE - young people who

- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- who suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in, or are excluded from education.

CCE can be committed or facilitated by an organised network, and the victim may identify as being part of this group. This could constitute modern slavery, and a modern slavery referral should be completed where a potential victim is identified. Victims aren't always recognised and can be criminalised for actions they take while under coercion, and that's a significant concern.

Child Sexual Exploitation (CSE)

CSE is a form of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and young people or adults. Most sexual abuse is committed by those previously known to the victim The abuse can

be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Integrated Front Door and the police, if appropriate. Indicators of sexual exploitation can include a young person:

- 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

A more comprehensive list of CCE & CSE indicators can be found here:
https://www.wirralsafeguarding.co.uk/child-exploitation/

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include: • increased absence from school or college, • a change in friendships or relationships with older individuals or groups, • a significant decline in educational performance, • signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries• unexplained gifts or new possessions They could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. The likelihood of involvement in serious violence may be increased by factors such as:

• being male
• having been suspended, spent time in Alternative Provision or permanently excluded from school
• having experienced child maltreatment
• having been involved in offending, such as theft or robbery
• having used drugs or alcohol in early adolescence, and
• having previously been a victim or previously perpetrated violence

A comprehensive list of risk factors can be found in the Home Office's Serious Violence Strategy.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (DSL) or deputy. The DSL or deputy will:

Assess the risk to the individual learners and others in Alma Education, considering wider information or concerns
Put in place a safety and support plan depending on the risk
Consider actions to de-escalate peer conflict where relevant

Staff need a keen awareness that violence can often peak in the hours around a session, when learners are travelling to and from a session and can concentrate in particular places. Further advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. Practical guidance for schools and colleges and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence via The Youth Endowment Fund.

Lesbian, Gay, Bisexual and Transgender (LGBTQ+) and Social Transition Learners

Alma Education believes that respect is a fundamental right and responsibility for all. It is the duty of all employees to ensure that every member of Alma Education community feels valued, irrespective of their sexual/gender orientation, race or religion.

Diversity is celebrated and valued and Alma Education will endeavour to ensure that LGBT learners have a trusted adult with whom they can be open. Children may at any time question their gender identity or express that they are not the sex biologically assigned to them. Young children go through a period of questioning their gender, but for the majority this will not continue into adulthood.

Alma Education is aware of the potential vulnerabilities of these children (e.g. the possibility of complex mental health and psychosocial needs, for example relating to relationships with family and peers) and adopts policies that maintain flexibility and takes a strong, proactive stand against all forms of bullying.

Staff will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious. Alma Education will work with a child and their family to support them on their journey and to put in place a bespoke package which allows them to take appropriate steps forward. A child may be in a vulnerable state as they try to navigate their feelings. It is also important to understand that parents and family may also struggle to come to terms with the wishes and intentions of their children.

Alma Education will actively involve parents/carers where a child who is questioning their gender asks for support, unless there are circumstances where doing this would constitute a greater risk to the child than not involving them.

Where a child or their parent/carer has raised a request relating to social transition, Alma Education will:

- Consider the best way to support the child and take the necessary steps when a child requests support
- Document decision-making processes and keep records, ensuring compliance with safeguarding legislation and equality and human rights law
- Ensure any assessment is informed and evaluated with the welfare and best interests of the child and other children at the heart of any decision making.

See paragraphs 262-265 and 278-282 in KCSIE for more detail on reviewing previous decisions, recording correct information, children 'living in stealth' and supporting children who wish to detransition (282) Further safeguarding requirements can be found in KCSIE 2026.

Alma Education will endeavour to support families during this time, but the welfare and safety of the learners will always come first.

Staff should not adopt any changes relating to social transition unless a decision has been made by the Director of Education and DSL, and the child's parents or carers have been involved. In addition to caring for the welfare of children, we will ensure that the legal rights of children are observed under the Equality Act 2010 and associated legislation.

County Lines

Report immediately

If county lines exploitation is suspected, call 101, or 999 in an emergency. Concerns can also be reported to Crimestoppers on 0800 555 111.

'County Lines' is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting young people and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. Heroin, cocaine, crack cocaine and Ketamine are the most common drugs being supplied and ordered. In most instances, the users or customers will live in a different area to where the dealers and networks are based, so drug runners are needed to transport the drugs and collect payment.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target young people and adults, often with mental health or addiction problems, to act as drug runners or move cash so they can stay under the radar of law enforcement.In some cases the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing. Dealers will also create drug debts in order to control the young person with the fear that they or their family will be subject to violence if the debt is not worked off.People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.As we have seen in child sexual exploitation, young people often don't see themselves as victims or realise they have been groomed to get involved in criminality. It is important that Alma Education plays a part to understand county lines and speak out if we have concerns. Signs that suggest involvement in county lines:

- Frequently missing from school or home / Travelling alone to places far away from home / not attending education
- Suddenly have lots of money / lots of new clothes / new mobile phone / Receiving more calls or texts than usual / Carrying or selling drugs / Carrying weapons or know people that have access to weapons
- Relationships with or hanging out with someone/people that are older and controlling
- May have unexplained injuries / seem scared very reserved or seem like they have something to hide / self-harm

Signs that county lines are happening in a specific area: An increase in visitors and cars to a house or flat / New faces appearing at the house or flat / New and regularly changing residents (e.g. different accents compared to local accent)

- Change in residents' mood and / or demeanour (e.g. secretive / withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia / Changes in the way young people might know dress
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc.) / Residents or young people you know going missing, maybe for long periods of time
- Young people seen in different cars / taxis driven by unknown adults / seeming unfamiliar with your community or where they are. / Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community / Unexplained injuries
- Details can be found here - County Lines and Criminal Exploitation - Wirral Safeguarding Children Partnership

Action to be taken if county lines is suspected

Alma Education will report any concerns to the police by dialling 101, or in an emergency 999. Concerns may also be reported by calling Crimestoppers on 0800 555 111. Any concerns linked to the railways will be reported to the British Transport Police by texting 61016 or by dialling 999 in an emergency. The DSL may choose to involve Catch 22, to ensure that young people who have become involved in county lines are able to access specialist support and avoid further involvement in situations that they find difficult to get themselves out of. The DSL may make a referral to the Integrated Front Door if it is suspected that a young person is at risk of harm.

Contextual Safeguarding, Harm outside the home (HOTH) and Extra-Familial Harm

Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm outside of their families, including within peer groups, local neighbourhoods and online environments.

Traditional child protection models have tended to focus on risks within the home, typically involving parents, carers or other trusted adults. However, this does not account for the considerable amount of

time young people spend in social settings beyond their family, where peer influence, unsupervised environments and online platforms may pose significant risks to their safety, wellbeing and development.

Harm outside the home (HOTH) recognises that a child's environment and social context, including their peer network, community and wider societal influences can shape their behaviours, experiences and vulnerability. Consequently, it seeks to identify and respond to harm occurring in these domains and to address the systems, norms and settings that allow such harm to occur. This includes altering unsafe environments as well as supporting the individual child.

Research has shown that young people are often influenced as much by social dynamics and external factors as by family relationships. Alma Education therefore considers these broader influences when assessing safeguarding risk and designing interventions. HOTH encompasses a range of extra-familial harms, including (but not limited to):

- Child-on-child and relationship abuse
- Child criminal exploitation (CCE) and child sexual exploitation (CSE)
- Online abuse, grooming and harassment
- Missing episodes or absconding from education
- Gang involvement, serious youth violence and knife crime
- Radicalisation and extremist ideologies
- Trafficking and modern slavery
- Abuse or exploitation in public spaces, including transport networks, shops, parks or parties

All staff have a duty to be alert to such risks and apply professional curiosity when assessing a young person's context. Where concerns arise, they must be recorded and referred to the Designated Safeguarding Lead (DSL).

The DSL will:

- Review contextual information, including peer dynamics, local intelligence and online activity where appropriate.
- Undertake contextual risk assessments, especially where patterns of harm or vulnerability extend beyond the home.
- Liaise with external agencies such as the Integrated Front Door, Youth Justice, Family Help or Merseyside Police as necessary.
- Work with relevant partners to change or manage the environments where risk is present, and ensure interventions are child-centred, proportionate and responsive to the wider context.

Domestic Abuse

The cross-government definition of domestic violence and abuse is 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality'. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

All young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on young people. In some cases, a

young person may blame themselves for the abuse or may have had to leave the family home as a result. All staff will be alert to the signs of domestic abuse and will report this to the DSL.

Alma Education recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. We also recognise children who witness domestic abuse are victims, that witnessing domestic abuse can have a lasting impact on children, and that children can be victims in their own relationships too. They may feel helpless, humiliated and blame themselves. School may be the only stable, secure and predictable element in their lives. Members of staff in safeguarding / pastoral roles have awareness of the DfE's guidance on domestic abuse: https://www.gov.uk/guidance/domestic-abuse-how-to-get-help and guidance published by the Wirral Safeguarding Partnership: What is domestic abuse information.

Operation Encompass and Police Notifications

Same-day action required
When a DSL receives an Operation Encompass notification, appropriate support must be offered to the child discreetly and sensitively on the same day.

Alma Education is part of Operation Encompass, a national initiative that ensures education providers are notified by the police before the next session takes place when a learner has been involved in, or exposed to, a domestic abuse incident in the home.

This information sharing enables Alma Education to provide timely, appropriate pastoral support to affected children and their families.

Key Features:

- Operation Encompass notifications are received by the Designated Safeguarding Lead (DSL), who is trained in receiving and handling the information confidentially.
- The DSL ensures that appropriate support is offered to the child discreetly and sensitively on the same day.
- No direct disclosure is made to the child unless deemed appropriate by the DSL, in consultation with relevant agencies.

In addition to domestic abuse incidents, schools may also be notified via police reports if:

- A learner has been reported missing or absent in circumstances that give rise to concern
- A learner has been arrested or involved in a criminal incident
- A welfare concern is identified through police attendance at a property

Where such information is shared:

- The DSL will assess whether the incident meets the threshold for Family Help or Children's Social Care referral.
- The incident will be recorded securely with due regard for confidentiality and data protection.
- Parents will be contacted where appropriate, in line with advice from the police or safeguarding partners.

We recognise that timely information sharing with schools by the police can play a critical role in identifying risk, reducing harm and ensuring a coordinated safeguarding response. Alma Education works in close partnership with Merseyside Police, Wirral Safeguarding Children Partnership and other relevant agencies to ensure the best outcomes for children.

Private Fostering

Private fostering is when a young person or young person under 16 years old (or under 18 if disabled) lives with someone for 28 days or more by private arrangement (without the involvement of a local authority) with someone who is not a:

- Parent or close relative (brother, sister, aunt, uncle, grandparent or step-parent)
- guardian or a person with parental responsibility

Private foster carers might be:

- friends of the young person's family
- someone willing to care for the young person of a family they don't know; or relatives not mentioned in the list above, for example a cousin or great aunt

Examples of private foster care arrangements:

- young people sent to this country for education or health care by parents or guardians living overseas
- teenagers living with a friend's family as a result of problems at home
- young people on holiday exchanges
- young people whose parents' study or work involves unsociable hours, which make it difficult for them to use ordinary day care or after school care

Reporting an arrangement:

All private fostering arrangements will be reported to LA Children's Services through the Integrated Front Door by phoning 0151 606 2008. All private fostering notifications received by the Integrated Front Door will be transferred to the appropriate district social work assessment team and the safeguarding unit will be notified.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL (and any deputies) should make any referrals to the Wirral Council Local Housing Authority so they can raise/progress concerns at the earliest opportunity. This can be done by completing the online form. Indicators that a family may be at risk of homelessness include household debt, rent arrears,

domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into LA Children's Services via the Integrated Front Door where a young person has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The Homeless Reduction Act Factsheet usefully summarise the new duties. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of young people who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the young person's circumstances.

Family Members in Prison

Young people who have children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Alma Education understands the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability. Alma Education will work with agencies and resources such as NICCO to help mitigate negative consequences for those young people.

Young People and the Court System

Young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides, published by HM Courts and Tribunals service, to support young people aged 5-11 years and 12-17 years. The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making young person arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for young people. To support, there is an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

'Honour-Based' Abuse (including Female Genital Mutilation (FGM) and Forced Marriage)

'Honour-based' abuse (HBA) 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 staff will be alert to the possibility of a young person being at risk of HBA or already having suffered it. If staff have a concern, they will record their concerns and speak to the DSL, who will make a referral to the Integrated Front Door.

Female Genital Mutilation (FGM)

Mandatory reporting duty
Where a member of staff discovers that FGM appears to have been carried out on a girl under 18, this must be reported to the police. This is a personal, non-delegable legal duty.

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

Section 7.4 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 learners is at risk of FGM.

Indicators that FGM has already occurred include and may initially mirror those of sexual abuse:

- A learners confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/learners 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 activity
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 learners may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced 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 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 young people about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from sessions
    - 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

Staff may only have one opportunity to speak to a young person at risk of forced marriage. Report any concern to the DSL immediately, do not wait to gather more information.

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.

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 learners is being forced into marriage, they will then report this to the DSL.

The DSL will:

- Speak to the learners about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the Integrated Front Door.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk.

- Ensure that the learner has a single point of contact at Alma Education who they can talk to, and refer for support from external agencies as necessary.

Preventing Radicalisation

Report concerns promptly
If staff are concerned that a learner is being radicalised, they must record and report their concerns to the DSL without delay, following section 7.5 of this policy.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. The education sector has a duty to prevent young people from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify young people at risk.

There will be an assessment carried out to look at the risk to the cohort of young people being drawn into terrorism. The assessment will be based on an understanding of the potential risk in our local area, in collaboration with the Wirral Safeguarding Children Partnership.

There will be suitable internet filtering is in place to equip learners with the necessary skills to stay safe online during sessions 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 will be alert to changes in learners' behaviour.

The government website Educate Against Hate and charity NSPCC identify signs that a learners is being radicalised can include:

Refusal to engage with, or becoming abusive to, peers who are different from themselves
Becoming susceptible to conspiracy theories and feelings of persecution
Changes in friendship groups and appearance
Rejecting activities that they used to enjoy
Converting to a new religion / ideology
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

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

If staff are concerned about a learners, they will follow our procedures set out in section 7.5 of this policy, including recording their concerns and discussing their concerns with the DSL. Staff should always act if they are worried.

Checking the Identity and Suitability of Visitors

All visitors will be required to verify their identity.

If the visitor is unknown to Alma Education, we will check their credentials and reason for visiting before allowing them to be present during a session. Visitors should be ready to produce identification in line with WSCP's visitor protocol.

Visitors are expected to sign in upon entry and wear a visitor's badge.

Visitors to Alma Education who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into Alma Education any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise learners or staff.

Missing Child Procedure

If a learner goes missing

Begin an immediate search of the immediate area, coordinated by the DSL. Contact parents/carers without delay, and involve the police promptly if the learner is not quickly found.

1. Purpose

- It is essential that the necessary steps are taken to safeguard and promote the welfare of all young people, and this is seen as an utmost priority. Any young person going missing from a class is a safeguarding issue.
- The procedure will be followed alongside the Child Protection and Safeguarding Policy and any other relevant Alma Education policy or procedure.
- All staff must understand what to do in the event that a learner were to be lost or go missing during a session, whether at an Alma hub, in the community, or during a visit.
- It is the responsibility of the DSL and Director of Education to ensure that these procedures are understood and followed.
- It is the responsibility of all staff to read these procedures and to act at all times accordingly.

2. Introduction

- 2.1. The procedures have been adopted in respect of any learner who goes missing during a session or wanders off from our care, even if they remain nearby.
- 2.2. The procedures will be used in respect of all cases in which it is found that a young person is lost or missing.
- 2.3. The policy enables a child missing situation to be dealt promptly and professionally in a "worst case scenario" of a missing young person. It emphasises the responsibility for attendance, registers and keeping young people safe.
- 2.4. Due consideration will be given by the DSL as to whether a referral to the Integrated Front Door is required. For example, where the young person needs protection, family help or in need of other support.
- 2.5. Staff are responsible for completing the attendance registers, including at any sessions or activities. The register must be completed accurately and promptly. The law requires schools to have an attendance register taken both in morning and afternoon sessions.

3. Steps to Keep Young People Safe

3.1. All procedures will be managed with common sense and sound judgement.

- 3.2. For all learners, we must only release them into the care of individuals who have been notified to us by the parent or carer in advance, and we must ensure that learners do not leave a session unsupervised. We must take all reasonable steps to prevent unauthorised access to a session and have an agreed procedure for checking the identity of visitors.
- 3.3. At all times, parents can be assured that all young people remain within the safe environment of their Alma Education session, including attendance at any outings. We ensure that proper precautions are taken to prevent young people going missing.
- 3.4. If any learner is found to have left a session without the permission of Alma Education and their parents or carers, this will be considered in line with Alma Education's Behaviour Policy, and any appropriate and proportionate response will be considered by the Director of Education.

- 3.5. It is the responsibility of parents to ensure they provide correct and updated information on a timely basis and know the procedures for handover of their young person.
- 3.6. Particular care will be taken to formally register every learner on Alma Education's attendance system at the start of every session. As a minimum, any unexplained absence will be reported immediately to the DSL and the Director of Education by the learning mentor so that swift and immediate action will be taken. This should be done via email.

In the absence or unavailability of the DSL, staff follow the absence cover arrangements set out in this policy. In the case of incidents occurring during a community visit or trip, the visit leader will assume such responsibility, as agreed with the Educational Visits Coordinator on behalf of the DSL and Director of Education.

As soon as a learner is reported missing from a session, a search of the immediate area will be undertaken.

This search will be co-ordinated by the DSL supported by other Alma staff available at the time. The search of all of the obvious nearby places should take no more than 15 minutes.

If the learners has not been found, parents will be contacted. They will be advised of what has happened and will be asked to try to contact their child by calling her mobile number (where applicable). If after a further 15 minutes, there has been no contact with the young person and they are not found, the DSL will dial the police on 101. If there is reason to suspect that the young person is at risk of harm or in immediate danger, the police emergency number (999) will be dialled.

The information required by the police to assist in locating and returning the learners to a safe environment is as follows:

- The learners name(s); date of birth; status (for example, CLA); responsible authority
- Where and when they went missing
- Previous missing episodes (if any) and where they went
- Who, if anyone, they went missing with
- What the young person was wearing plus any belongings they had with them such as bags, phone (include mobile number)
- Description and recent photo
- Medical history, if relevant
- Time and location last seen
- Circumstances or events around going missing with relevant safeguarding information
- Details of family, friends and associates

Whilst the search is ongoing, Alma Education will continue to liaise with the police and act in accordance with police instructions.

Option 1: if the young person is found before the police have arrived then the police must be informed and procedures need to be followed.

Option 2 - if the young person returns independently, then the police must be informed, and procedures need to be followed.

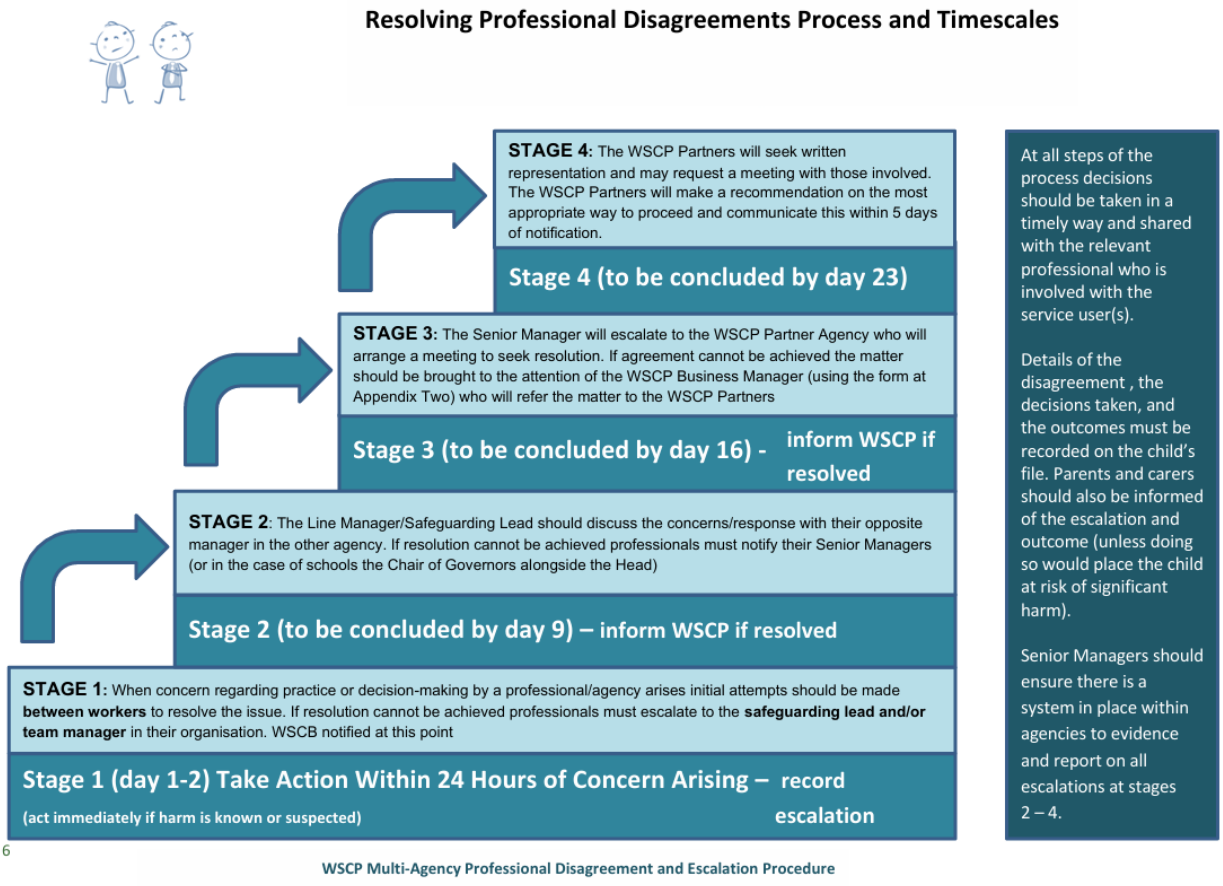
Option 3 - if the police locate the young person and bring them back to Alma Education the police will conduct the safe and well interview and Alma Education will follow school procedure.

Where a learners has a known risk of being missing, a risk assessment for the learners will be written and put in place.

3.7. Where a session takes place at an Alma hub, visitors are recorded upon arrival and departure and follow the signing-in procedure. Any learner who needs to leave a session early for an appointment must have this confirmed in advance with the family or commissioning body, and this absence recorded appropriately by the Director of Education. Evidence of the appointment should also be provided where possible.

Appendix 5: Escalation Procedures

[Escalation procedures graphic to be inserted]



Appendix 6: Training Log

Type of Training	Date Completed	Renew Date
All Staff: Refresher / Updates (annual)	September 2026	September 2026
Whole-Team Safeguarding Training (due every three years)	September 2026	September 2026
Senior Designated Safeguarding Lead (DSL) (due every two years) - Melanie Steel	July 2026	July 2028
Deputy Senior Designated Safeguarding Leads (due every two years)	September 2025	September 2025
Safer Recruitment Training (due every five years)	September 2026	September 2026
Advisory Board members Training (annual)	September 2026	September 2026

Policy	Statutory / Frequency*	Suggested Review Month(s)
Child Protection & Safeguarding	KCSIE & Working Together*	August 2026
Behaviour Policy	Education Act 2002*	August 2026
Staff Code of Conduct	Education Act 2002*	August 2026
Health & Safety Policy	Health & Safety at Work Act*	August 2026
First Aid Policy	Every 2 years	August 2026
Fire Safety Policy	Annually	August 2026
Admissions Policy	Admissions Code*	August 2026
Student Induction Policy	Annually	August 2026
Attendance & Absence Policy	Annually	August 2026

Data Protection & Privacy Policy	UK GDPR*	August 2026
Safer Recruitment Policy	Every 2 years	August 2026
SEND Policy	SEND Regulations 2014*	August 2026
Social, Emotional & Mental Health Policy	Annually	August 2026
Prevent Duty Policy	Counter-Terrorism and Security Act 2015*	August 2026
Complaints Policy	Education Act 2002*	August 2026
Anti-Bullying Policy	Annually	August 2026
Curriculum Policy-	Every 2 years	August 2026
Assessment Policy	Every 1 to 2 years	August 2026