



NMT Safeguarding Children and Vulnerable Adults Policy 2023-2024

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Part 1: Safeguarding information for all staff

1. DSL Contacts

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2. Introduction

2.0.1 This Policy deals with the protection and safeguarding of all children, vulnerable adults and any learners at a New Meaning Training (NMT) centre and as such, all of the following people will have access to this document and the procedures herein:

- NMT employees
- NMT learners
- NMT Board members
- NMT Volunteers
- Any Visitors to any NMT centres
- Any Contractors working at or on any NMT centre
- Any person or persons hiring out areas of any NMT centre
- Subcontracted provision

2.0.2 This Policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication 'Safer Practice, Safer Learning' 2007 and in line with the following:

- Keeping Children Safe in Education – statutory guidance for schools and further education colleges Sep 2022
- Working Together to Safeguard Children 2018
- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2006

- Mental Capacity Act 2005
- Buckinghamshire Multi-Agency Information sharing for Children, Young People & Families – Code of Practice for sharing personal information, August 2017
- Local Safeguarding Children's Partnership guidance
- Children Missing Education; Statutory Guidance for Local Authorities Sept 2016
- Statutory Guidance issued under section 29 of the Counter Terrorism and Security Act 2015
- Sexual Violence and Sexual Harassment between Children – Sep 2021
- Serious Crimes Act 2015
- The Equality Act 2010
- The United Nations Convention on the Rights of the Child (UNCRC)
- Domestic Abuse Act 2021

2.0.3 We will take account of further guidance issued by the Department for Education and the local authority.

2.0.4 NMT takes seriously its responsibility under section 175 of the Education Act 2011 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements are in place within NMT to identify, assess, and support those children who are suffering harm or whose welfare may be in question.

2.0.5 Designated Safeguarding Leads will ensure all staff at NMT have read and understood their responsibilities pertaining the NMT Safeguarding Policy.

2.0.6 We recognise all NMT staff have a full and active part to play in protecting our learners from harm and actively promoting their welfare and that the learners' welfare is our paramount concern.

2.0.7 All staff believe NMT should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual learner.

2.0.8 NMT recognises that as well as threats to the welfare of learners from within their homes, learners may be vulnerable to abuse or exploitation outside their homes and from other learners. Staff will remain vigilant and alert to these potential risks.

2.0.9 We have a Safeguarding Manager and Designated Safeguarding Leads (DSLs) who have undertaken appropriate training for the roles, who can advise other NMT staff members.

3 Scope

3.0.1 NMT's commitment to safeguarding applies to all staff, learners, subcontract partners and other users; including volunteers, external contractors, remote learners, and employers where learners have work placements and this policy outlines this commitment and how it runs through our practice.

4 Responsibilities

4.1 Responsibilities of all NMT Staff

4.1.1 All NMT staff understand safeguarding young people is **everyone's responsibility**. Any member of staff, volunteer or visitor to NMT who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred will follow NMT procedure and report it immediately to a Designated Safeguarding Lead (DSL). In the absence of the above,

concerns should be brought to the attention of the most senior member of staff, the Director of NMT. NMT Staff understand if there is an immediate risk of harm then they should call the Police or First Response directly and update a DSL at the earliest opportunity. See flow chart attached (Appendix Two).

- 4.1.2** NMT staff understand that no single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 4.1.3** All staff should be aware of systems within NMT which support safeguarding, and these are explained to them as part of staff induction. This includes:
- All NMT staff must complete safeguarding training to also include Prevent training.
 - Child Protection Policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
 - Behaviour Policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
 - Safeguarding response to children who are absent or go missing from education.
 - Know the role of the safeguarding manager and designated safeguarding leads (including the identity of the designated safeguarding leads).
 - Awareness of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
 - Know the NMT process for reporting a concern about a learner (CPOMS).
 - Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows staff to share special category personal data. This includes allowing staff to share information without consent where there is a good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a staff member gains consent, or if consent would place a child at risk.

4.1.4 The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare and protect the safety of children.

4.2 Responsibilities of DSLs

- 4.2.1** The DSLs understand and fulfil their safeguarding responsibilities. They will:
- Ensure that they create and maintain a strong, positive culture of safeguarding within NMT, including culture of zero tolerance approach to abuse.
 - Acting as a focal point for staff to be able to discuss and share their concerns, supporting staff to formulate their thinking and be part of planning to address issues raised, liaising with other agencies and professionals to achieve change.

- Ensure the Safeguarding, Child Protection and Vulnerable Adults Policy reflects the unique features of the community NMT serves and the needs of the learners attending NMT provisions. This will be reviewed at least annually.
- Monitor and evaluate the effectiveness of the Policy and be satisfied that it is being complied with.
- Attend refresher training every 2 years, in addition knowledge and skills must be refreshed at regular intervals, at least annually.
- Ensure robust structures are in place to challenge the DSL where there are any identified gaps in practice or where procedures may not have been followed.
- Recognise the contribution NMT can make to helping learners and young people keep safe, through incorporation of safeguarding within the curriculums.
- Ensure safe and effective recruitment policies and disciplinary procedures are in place, which adhere to Keeping Children Safe in Education (KCSiE 2022) and legislation referred to therein.
- Ensure the needs and voice of the learners for early intervention and Child Protection are fully understood and resources allocated to meet identified needs.
- As we work increasingly more online, DSLs must ensure appropriate filters and appropriate monitoring systems are in place.
- Ensure that NMT staff undergo regular updated safeguarding training, including online safety.
- Understand NMT's responsibility under Ofsted's Education Inspection Framework.
- Ensure referrals to partner agencies are followed up in writing, within 24 hrs of initial contact.
- Ensuring records are up to date and staff are supported to differentiate between fact / opinion / hearsay and are maintained in accordance with data protection.
- Ensuring records are stored safely and securely and remain confidential. The DSL will share information on a 'need to know' basis only.
- Meeting regularly with the Director of NMT to share oversight of safeguarding provision within the setting, monitor performance and develop plans to rectify any gaps in delivery noted.

4.2.2 It will be the duty of the NMT Peoples Manager, to liaise with relevant agencies if any allegations are made against the Director of NMT. If there are concerns that issues are not being progressed in an expedient manner, staff/learner/parents should escalate concerns directly to Bucks College Group.

5 Procedures

5.0.1 Our NMT procedures for safeguarding and protecting learners from harm are in line with Buckinghamshire Council and Buckinghamshire Children's Safeguarding Partnership and Buckinghamshire Safeguarding Adults Board Procedures, "Working Together to Safeguard Children 2018", "Keeping Children Safe in Education" 2022, The Care Act 2014, Safeguarding Vulnerable Groups Act 2006, Mental Capacity Act 2005 and statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015.

- 5.0.2** NMT have a Safeguarding Manager and multiple DSLs who are the Area Managers for each centre, so each centre has an appropriately trained member of staff.
- 5.0.3** All adults new to NMT, are made aware of NMT's policy and procedures for safeguarding and child protection, the name and contact details of the Safeguarding Manager and DSL and their role and responsibilities under Keeping Children Safe in Education 2022.
- 5.0.4** All NMT staff must follow the reporting procedures as follows when reporting any concerns:
- NMT Staff will ensure the learner is in a safe place and in receipt of support should this be needed.
 - NMT Staff will initially make a verbal report to the Safeguarding Manager or a DSL to alert them to the safeguarding concern arising.
 - NMT Staff will then follow this up, making a written report using the NMT referral process.
 - All concern forms/emails will be sent to the Safeguarding Manager and DSLs via CPOMS;
 - NMT Staff will ensure the **time and date** of the incident is recorded.
 - A factual account of the incident **who** was involved, **what** was said/seen/heard, **where** the incident took place and any preceding information which may have prompted the event.
 - No staff opinions should be included in the account.
 - Use a body map to record any injuries seen or reported by the learner.
 - The DSL will respond to the report with any actions that need to be taken.
 - All outcomes will also be logged on the report.
 - All learners attending NMT are required to have a minimum of two identified emergency contacts. This is to support prompt communication in the event of a serious incident or a learner missing from NMT.
 - Any Under 18 learner absent for ten NMT days, where it has not been possible to make contact with a parent/carer, will be reported as a Child who is Absent from Education using the CME Protocol.
 - Any absence of two consecutive NMT days, without satisfactory explanation, of an Under 18 learner currently subject to a child protection plan is immediately referred to their social worker.
 - Learners must inform NMT if there are any changes to where they will be living.
- 5.0.5** NMT has a mandatory duty to inform the local authority via the First Response Team, if a child under the age of 16 yrs, lives with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.
- NMT operates Safer Recruitment practices including ascertaining the suitability of employed staff and volunteers in regulated activities. Checks will be made through the Disclosure and Barring Service.
 - Allegations against members of staff are referred to the Local Authority Designated Officer (LADO). There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. NMT recognises that this is a legal duty and a failure to refer when the criteria are met is a criminal offence.

6 Retention of Records

- 6.0.1** When a disclosure of abuse, or an allegation against a member of staff or volunteer, has been made, NMT will have a record of this. These records will be maintained in a way that is confidential and secure, in accordance with our Record Keeping Policy and Data Protection Legislation.
- 6.0.2** There is a statutory requirement for NMT to pass any safeguarding and child protection records to the learner's next educational establishment, if requested. We are required to have an auditable system in place to evidence we have done so. Any transfer of records will be carried out using a secure method and will be sent separately to the learner's general file.
- 6.0.3** The last statutory educational establishment maintains child protection files until a learner reaches the age of 25 years, therefore if the transfer establishment is unknown, or a learner is going to be electively home educated, any child protection files will remain at NMT in a secure location. Child protection files will only be destroyed when the learner reaches their 25th birthday.

7 Confidentiality

- 7.0.1** NMT recognise that all matters relating to child protection are confidential. The Director of NMT, Safeguarding Manager or Designated Safeguarding Leads must only disclose personal information about a learner to other members of staff on a need to know basis.
- 7.0.2** Staff must not keep duplicate or personal records of child protection concerns. All information will be reported to the Safeguarding Manager or Designated Safeguarding Leads and securely stored on CPOMS, separate from the learner's records.
- 7.0.3** All staff are aware they cannot promise a learner to keep secrets which might compromise their safety or well-being or that of another as they have a duty to share. Staff must, however, reassure the learner that information will only be shared with those people who will be able to help them and therefore need to know.
- 7.0.4** NMT will share our intention to refer a young person to Social Care (First Response) with their parents/carers, unless to do so could put them at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with First Response on this point. We recognise that GDPR must not be a barrier for sharing information regarding safeguarding concerns.

8 Dealing with a Disclosure

- 8.0.1** In the event of a learner disclosing information NMT staff will:
- Listen to the learner, allowing them to tell what has happened in their own way, and at their own pace. Staff must not interrupt a learner who is freely recalling significant events.
 - Remain calm. Be reassuring and supportive but endeavour to not respond emotionally.
Not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the learner may have said.

- Make an accurate record of what they have seen/heard on CPOMS- keeping processes, recording; times, dates or locations mentioned, using as many of the exact words and expressions used by the learner as possible. Staff must not substitute anatomically correct names for body part names used by the learner.
- NMT Staff will send the CPOMS report to the DSLs to get their responses.
- Staff can also call their local DSL for advice to talk through the disclosure in more detail.

8.0.2 If there is immediate risk of harm to a learner, Staff will NOT DELAY and will ring 999 and keep the learner safe at the NMT centre, until further guidance is given.

8.0.3 Following a report of concerns the DSLs must:

- Decide whether there are sufficient grounds for suspecting harm, in which case a referral must be made to First Response and the Police if it is appropriate. The rationale for this decision should be recorded by a DSL.
- NMT should try and discuss any concerns about a learner's welfare with parents/carers and where possible obtain consent before making a referral to First Response. However, in accordance with DfE guidance, this should only be done when it will not place the learner at increased risk or could impact a Police investigation. Where there are doubts or reservations about involving the learner's family, the DSL should clarify with First Response or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation.
- A referral to social care should be made, using the relevant multi-agency referral form.
- If the learner is in immediate danger and urgent protective action is required, the Police must be called. The DSL must then notify First Response of the occurrence and what action has been taken.
- If a learner needs urgent medical attention, the DSL should call an ambulance via 999. DSL to contact First Response; advice to be sought from First Response about informing parents/carers.

9 Multi-Agency Working

9.0.1 NMT has a pivotal role to play in multi-agency safeguarding arrangements.

Governing bodies and proprietors should ensure that NMT contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

9.0.2 Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the Chief Officer of Police for an area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children and young adults, including identifying and responding to their needs.

10 Staff Support

- 10.0.1** NMT recognise that NMT staff who have become involved with a learner who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- 10.0.2** NMT support such staff by providing an opportunity to talk through their anxieties with the Safeguarding Manager or DSL, to receive supervision and to seek further support if necessary from the NMT Peoples Manager.

11 Allegations Against Staff including Volunteers

11.1 Allegations that may meet the harms threshold

- 11.1.1** This guidance should be followed where it is alleged that anyone working in NMT that provides education for children under 18 years of age, including volunteers, has:
- Behaved in a way that has harmed a child or young person, or may have harmed a child or young person.
 - Possibly committed a criminal offence against or related to a child or young person.
 - Behaved in a way towards a child or young person in a way that indicates he or she may pose a risk of harm to children or young people.
 - Behaved in a way that indicates they may not be suitable to work with children or young people.
- 11.1.2** All NMT staff should take care not to place themselves in a vulnerable position with a learner. It is always advisable for interviews or work with individual learners or parents/carers to be conducted in view of other adults. There must be no 1:1 contact between staff and learners which is not "open to the casual observer".
- 11.1.3** If an allegation is made against a member of NMT staff, the member of staff notified of the allegation will immediately inform the Director of NMT or the NMT Peoples Manager or the most senior member of staff available at NMT if neither are available. They will contact the LADO. Allegations against a tutor who is no longer teaching should be referred to the Police. Historical allegations of abuse should be referred to the Police.
- 11.1.4** The Director of NMT and LADO will consider the nature, content and context of the allegation and agree a course of action.
- 11.1.5** The Director of NMT will;
- Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member or volunteer against whom the allegation is made, as well as supporting other staff and volunteers within the workplace.
 - Follow all advice given by the LADO relating to supporting the learner making the allegation, as well as other learners and young people connected to NMT.
 - Ensure feedback is provided to the LADO about the outcome of any internal investigations within NMT.
- 11.1.6** If the allegation made to a member of staff concerns the Director of NMT, the person receiving the allegation will immediately inform the LADO without notifying the Director of NMT first.
- 11.1.7** NMT staff will follow the NMT Disciplinary Policy for managing allegations against staff and volunteers.

11.2 Allegations that do not meet the harms threshold

11.2.1 Allegations that do not meet the harms threshold are called 'low-level concerns'.

11.2.2 The term 'low-level' does not mean this is insignificant; it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of NMT may have acted in a way that:

- Is inconsistent with the NMT Staff Code of Conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- Being over friendly with learners.
- Having favourites.
- Taking photographs of learners on their mobile phones.
- Engaging with a learner on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating or offensive language.

11.2.4 If an allegation is made, the member of staff notified of the allegation will immediately inform a DSL, the Peoples Manager or Director of NMT.

11.2.5 The DSL and Peoples Manager will speak directly to the person who raised the concern and to any individuals and witnesses. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken following the NMT Disciplinary Policy.

12 Lone Working

12.0.1 NMT Staff are aware of the risks of lone working and that it only takes place when it is essential. The NMT Lone Working Guidance sets out the guidelines of what needs to happen if lone working is taking place, such as informing other staff members of the situation and making a risk assessment. Please refer to the NMT Lone Working Guidance document for more clarification.

13 Transfer of Risk

13.0.1 Should an individual staff member or volunteer be involved in child protection, other safeguarding procedures or Police investigations in relation to abuse or neglect, they must inform the Director of NMT. In these circumstances, the Director of NMT and Peoples Manager will need to assess whether there is any potential for risk of transfer to the workplace and the individual's own work with learners or vulnerable people.

14 Whistleblowing

14.0.1 NMT have a specific Whistleblowing Policy.

14.0.2 All NMT staff are aware of their duty to raise concerns about the attitude or actions of colleagues. More information on how to raise concerns can be found in the NMT Whistleblowing Policy.

15 Transportation of Learners

15.0.1 NMT staff understand that transportation of learners could become a safeguarding issue if the correct procedures are not followed. NMT staff also understand that they only transport learners if it is essential.

15.0.2 When transporting learners, there must be two staff members in the vehicle.

15.0.3 Staff must:

- Have prior approval from a DSL.
- Have car insurance which includes for 'business use' and confirm with insurers that they understand that this means transporting people.
- Obtain parental/guardian consent for transport of the young person –unless it is an emergency.
- Know and be acquainted with the background of the young person, significant issues such as violence and abuse, and only transport if there is no issue of concern.
- All learners being transported must have a risk assessment completed prior to the journey.
- Be aware of gender/religious issues and appropriateness of singly supervised journeys.

15.0.4 If for any reason two members of staff are not available and it is an emergency, then staff must take a taxi with the learner and inform the DSL. Under no circumstances must they transport the learner on their own.

16 Dual Learners

16.0.1 NMT has a duty of care towards learners who are also studying at another provision.

16.0.2 NMT staff have a duty to:

- Liaise with the provision to ensure together they are aware of the learners' needs.
- Inform the provision of any concerns or incidents that occur when the learner is at an NMT centre.
- Inform the provision contact of attendance.

16.0.3 Concerns regarding safeguarding or child protection for these learners must be referred to the Safeguarding Lead at the provision.

Part 2: Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children and young adults at risk of harm.

17 Prevention

17.0.1 We recognise NMT plays a significant part in the prevention of harm to our learners by providing effective lines of communication with trusted adults, supportive friends and an ethos of protection.

- 17.0.2** All NMT staff are required to attend training to support them to identify a range of safeguarding and child protection matters, helping them to recognise and respond appropriately should concerns arise, supporting them to act on or escalate concerns.
- 17.0.3** NMT recognises some learners, because of their life experiences or additional needs including Special Educational Needs, may be disproportionately affected by the behaviours of their peers or vulnerable to the influence of others.
- 17.0.4** NMT staff will therefore:
- Establish and maintain a safeguarding ethos, which is understood by all staff, enabling learners to feel secure. Ensuring all learners know there are staff in NMT whom they can approach if they are worried or in difficulty.
 - Receive focused annual training and regular CPD to support learning and understanding of the changing landscape of safeguarding which is underpinned by legislation and includes issues such as FGM, themes of exploitation and management of sexual violence and sexual harassment.
 - Understand safeguarding and protection of learners has to be viewed within the context of the learners' lived experience and the factors around them which may impact on this; friends, family, NMT and their community.
 - Provide, across the curriculum and through tutorials, opportunities which equip learners with the skills they need to stay safe from both physical and emotional harm and to know to whom they should turn for help.
 - Ensure staff work effectively with partner agencies to seek advice support and guidance, drawing on multi agency expertise, knowledge and experience to support learners at risk of harm including emotional and intellectual harm via social media and use of the internet.
 - Be sensitive and alert to the possibility of the risk some learners' behaviours may pose to their peers. Staff will be supported by a DSL to assess and act on concerns highlighted to ensure NMT remains a safe place to learn.
 - Whilst NMT strive to work together with families, staff understand that sharing information with parents may not always be appropriate and ensure that decisions of this nature are made in partnership with Children's Social Care or the Police.

18 Anti-Bullying

- 18.0.1** NMT have an Anti-Bullying Policy and measures in place to prevent and respond to all forms of bullying, which acknowledges that, to allow or condone bullying may lead to consideration under child protection procedures.
- 18.0.2** NMT Staff, learners and parents are made aware of how mobile technologies are increasingly being used to bully and coerce young people both in and outside of the NMT environment. Cyber bullying is therefore referenced within our Online Safety and Social Media Policy.

19 Discriminatory Incidents

- 19.0.1** The NMT Behaviour Policy references how discriminatory incidents will be dealt with and acknowledges the serious nature of these events and their impact on the individual/group of learners involved including those who may witness the incident. All incidents will be

taken seriously and consideration will be given as to whether a multi-agency approach using child protection procedures is required.

20 Health and Safety – Under 16 Learners

20.0.1 Learners under 16 are only permitted to leave site during the NMT day with written permission of their parent/carer. In the event of a learner going missing during the course of the NMT day NMT staff will carry out immediate checks to ensure the learner is not on site, staff will then make contact with the learner's parents/carers and if necessary, inform the Police.

21 Physical Intervention / Positive Handling

21.0.1 Physical intervention is covered in the NMT Behaviour Policy. The Policy states that NMT staff may only use 'reasonable force', meaning no more force than is needed, to prevent learners from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment. Staff will always aim to use de-escalation techniques.

21.0.2 Any use of force or restraint will be recorded and signed by a witness. The parent/carer will be informed of the incident.

22 Prevent Duty

22.0.1 NMT Staff are aware of the Prevent Duty to protect young people from radicalisation and extremism. At NMT we view this as a safeguarding matter like any other and the correct processes will be applied to support children, young people and their families where vulnerabilities are identified, invariably this will require us to work with partner agencies to support and protect the vulnerable learner.

22.0.2 Concerns regarding the conduct or behaviour of a learner, where it is believed they are vulnerable to extremism, will follow the same process of reporting as with any other safeguarding concern. The DSL will assess the concern and decide if a referral needs to be made to the First Response Team and passed by them to the Channel coordinator.

22.0.3 NMT centres have in place appropriate web filtering systems so that learners cannot view potentially extreme material. NMT Staff understand the need for a culture of vigilance to be present in NMT to support safeguarding. This includes awareness and sensitivity to changes in the attitudes of learners, which may indicate they are at risk of radicalisation.

22.0.4 All NMT staff attend training to support them to identify a range of safeguarding and child protection matters, helping them to recognise and respond appropriately should concerns arise, supporting them to act on or escalate concerns.

22.0.5 If a member of NMT staff has a concern they must:

- Report the concern on CPOMS and seek guidance from DSL.
- The record must be factual and not contain staff member opinions.
- The DSL will review the concern and decide the appropriate response.

23 Online Safety

23.0.1 NMT has an Online Safety and Social Media Policy which sets out our expectations for creating a safer online learning environment. NMT centres have in place appropriate web filtering systems so that learners cannot view potentially harmful material.

23.0.2 Staff, learners and parents are supported to understand the three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views.
- Contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

23.0.3 Cyber-bullying, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. This includes sexting and image exchange under threat or use of coercion.

24 Sexting or sharing nudes or semi nudes

24.0.1 'Sexting', also referred to as 'youth produced sexual imagery' including the sharing of nudes or semi nudes, is one of a number of 'risk-taking' behaviours associated with the use of digital technologies, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated.

24.0.2 Staff, learners and parents are supported via training to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes imagery of pupils themselves if they are under the age of 18.

24.0.3 Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for NMT. We will also use the guidelines for responding to incidents, as set out in the publication 'Sharing nudes and semi-nudes: advice for education settings' produced by the UK Council for Child Internet Safety. **Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)**

24.0.4 This requires us to share reports of this type of activity with the Police.

24.0.5 If a member of NMT staff becomes aware of an incident:

- The member of NMT staff must record the incident on CPOMS and notify a DSL immediately and must investigate the incident they must also advise if they have viewed the imagery by accident.
- Do not copy, print, share, store or save the imagery or ask the learner to share or download as this is illegal.
- Do not delete the imagery or ask the young person to delete it.
- Do not share information about the incident with other members of staff, learners, parents or carers.
- Do not say or do anything to blame or shame any young person involved.
- The record of the incident must be factual and not contain staff member opinions.

24.0.6 The DSL:

- Will determine if there is an immediate risk to a learner.
- Will meet with the member of staff who heard the disclosure.
- Meet with the learner and obtain further information- whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).
- Inform parents and carers unless there is good reason to believe that involving them would put the child or young person at risk of harm.
- Make a referral to social care and or the police immediately if there is concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

25 Child on Child Abuse

25.0.1 All NMT staff are aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of NMT Centres and online.

25.0.2 All NMT staff recognise that child on child issues may include, but may not be limited to:

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

25.0.3 If a learner makes an allegation of abuse against another learner:

- The member of NMT staff must record the allegation of abuse and tell a DSL, but they must not investigate it themselves.

- The DSL will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put support in place for all learners involved (including the victim(s), the learner(s) against whom the allegation has been made and any others affected) with a named person they can talk to.
- The DSL will also contact the relevant mental health service if appropriate.

25.0.4 In order to minimise the risk of child on child abuse taking place, NMT must:

- Challenge any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Deliver tutorials to include teaching learners about how to keep safe and understanding what acceptable behaviour looks like.
- Ensure that learners know that all members of staff will listen to them if they have concerns and will act upon them.
- Remain vigilant during lessons and at break times and challenge negative behaviour and language.
- Have systems in place for any learner to be able to voice concerns.
- Develop robust risk assessments if appropriate.
- Refer to any other relevant policies when dealing with incidents, such as the Behaviour Policy and/or the Anti-Bullying Policy.

26 Categories of Abuse

26.0.1 Child abuse is doing something or failing to do something that results in harm to a child or puts a child at risk of harm. Child abuse is when a child is intentionally harmed by an adult or another child- it can be over a period of time but can also be a one-off action. It can be physical, sexual, domestic or emotional and it can happen in person or online. It can also be a lack of love, care and attention, this is neglect.

26.1 Physical Abuse

26.1.1 Physical abuse is when someone hurts or harms a child or young person on purpose.

It includes:

- Hitting with hands or objects
- Slapping or punching
- Kicking
- Shaking
- Throwing
- Poisoning
- Burning and scalding
- Biting and scratching
- Breaking bones
- drowning

26.1.2 It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

26.2 Emotional Abuse

26.2.1 Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It is sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child. Emotional abuse is often a part of other types of abuse which means it can be difficult to spot the signs, or tell the difference. Though it can also happen on it's own.

26.2.2 It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.

26.3 Sexual Abuse

26.3.1 When a child or young person is sexually abused, they are forced or tricked into sexual activities. They might not understand that what is happening is abuse or that it's wrong. They might be afraid to tell someone. Sexual abuse can happen anywhere- and it can happen in person or online. It is never a child's fault that they were sexually abused and it is important to make sure children know this.

26.3.2 There are two types of sexual abuse: contact and non-contact abuse.

26.3.3 Contact abuse is when someone makes physical contact with a child. This can include touching, kissing and oral sex. Sexual abuse isn't just penetrative.

26.3.4 Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online and includes exposing or flashing, showing pornography, exposing a child to sexual acts, making them masturbate.

26.4 Domestic Abuse

26.4.1 Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between two people in a relationship. It can seriously harm children and young people and witnessing domestic abuse is child abuse.

26.4.2 The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

26.4.3 Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on learners. In some cases, a learner may blame themselves for the abuse or may have had to leave the family home as a result.

26.4.4 Some of the signs that a child has experienced or witnessed domestic abuse are:

- Aggression or bullying
- Anti-social behaviour
- Anxiety, depression or suicidal thoughts
- Attention seeking
- Nightmares or insomnia
- Constant or regular sickness, like colds, headaches
- Drug or alcohol use
- Problems in school or trouble learning
- Withdrawal

26.5 Neglect

26.5.1 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. The most common form of child abuse.

26.5.2 Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

26.5.3 Neglect can be difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected, but if you notice multiple signs that last for a while these might show there is a serious problem.

26.5.4 Some of the signs could be:

- Poor appearance and hygiene
- Health and development problems
- Housing and family issues
- Change in behaviour
- Not growing at expected rate
- Thin or hungry

26.5.5 If a staff member has any concerns about abuse or neglect of a learner:

- The member of NMT staff must record the concern or allegation of abuse on CPOMS and tell a DSL.
- The member of staff must listen carefully to the allegation or concern and reassure them it's not their fault and they have done the right thing telling you and you are taking their concern seriously.
- The DSL will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence.

- The DSL will put support in place for all learners involved with a named person they can talk to.
- The DSL will also contact the relevant mental health service if appropriate.

27 Exploitation

27.0.1 Exploitation is a form of child abuse and may take a number of forms.

27.1 Child Criminal Exploitation (CCE)

27.1.1 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- In exchange for something the victim needs or wants.
- For the financial or other advantage of the perpetrator or facilitator.
- Through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual.

27.1.2 CCE does not always involve physical contact; it can also occur through the use of technology.

27.1.3 CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

27.1.4 Some of the following can be indicators of CCE:

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

27.1.5 It is important to note that the experiences of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same. It is also important to note that both boys and girls being criminally exploited may be at a higher risk of sexual exploitation.

27.2 Child Sexual Exploitation

27.2.1 Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

27.2.2 It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may

have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

27.2.3 If a staff member has concerns that a learner may be being exploited in any way:

- The member of NMT staff must record the concern or allegation on CPOMS of exploitation and tell a DSL.
- The record must be factual and not contain staff member opinions.
- The DSL will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put support in place for all learners involved with a named person they can talk to.
- The DSL will also contact the relevant mental health service if appropriate.

28 Upskirting

28.0.1 NMT recognise that 'Upskirting' involves taking a photograph under an individual's clothing without their knowledge. This causes the victim distress and humiliation.

28.0.2 NMT Staff recognise that 'Upskirting' is a criminal offence under the Voyeurism Act, and must promptly report any such incidence to a DSL or most senior member of staff available. Offenders can now be arrested, face up to 2 years in prison and have their names placed on the sex offenders register.

28.0.3 If a staff member has concerns that a learner may be involved in 'Upskirting':

- The member of NMT staff must record the concern or allegation on CPOMS and tell a DSL.
- The record must be factual and not contain staff member opinions.
- The DSL will contact the local authority social care team where appropriate and follow its advice.
- The DSL must contact the police as this is a criminal offence.
- The DSL will put support in place for all learners involved with a named person they can talk to.
- The DSL will also contact the relevant mental health service if appropriate.

29 Sexual Harassment

29.0.1 Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline, within NMT and contextually. When we reference sexual harassment, we do so in the context of child on child sexual harassment.

29.0.2 NMT has a zero-tolerance approach to sexual harassment and it will not be tolerated.

29.0.3 Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Grooming- building a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit or abuse them.

- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (NMT staff should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - Non-consensual sharing of sexual images and videos.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including, on social media.
 - Sexual exploitation; coercion and threats.

29.0.4 NMT recognises that learners may not find it easy to tell staff about their abuse verbally. All staff receive training to identify learners who may show signs or act in a way that they hope a member of staff will notice and react to. For example, a friend may make a report or a member of NMT staff may overhear a conversation that suggests that a learner has been harmed or a learners' behaviour might indicate that something is wrong.

29.0.5 If a learner makes a disclosure:

- The member of staff must record the allegation of abuse and tell a DSL, but do not investigate it.
- The record must be factual and not contain staff member opinions.
- Reassure the victim that they are being taken seriously and that they will be supported and kept safe.
- The DSL will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put support in place for all learners involved (including the victim(s), the learner(s) against whom the allegation has been made any others affected) with a named person they can talk to.
- The DSL will also contact the relevant mental health service if appropriate.

30 Sexual Violence

30.0.1 NMT has a zero-tolerance approach to sexual violence and it will not be tolerated. Sexual violence is described as;

- Rape: A person (A) commits an offence of rape if: a person intentionally penetrates the vagina, anus or mouth of another person (B) with the penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina, anus or mouth of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

30.0.2 If a learner makes a disclosure:

- The member of staff must record the allegation of abuse on CPOMS and tell the DSL, but do not investigate it.
- The record must be factual and not contain staff member opinions.
- Reassure the victim that they are being taken seriously and that they will be supported and kept safe.
- The DSL will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put support in place for all learners involved (including the victim(s), the learner(s) against whom the allegation has been made any others affected) with a named person they can talk to.
- The DSL will also contact the relevant mental health service if appropriate.

31 Cultural Issues

- 31.0.1** NMT are aware of the cultural diversity of the community around us and seek to work sensitively to address the unique culture of our learners and their families as they relate to safeguarding and child protection. This includes learners at risk of harm from abuse arising from culture, faith and belief on the part of their parent, carer or wider community.
- 31.0.2** NMT are aware of the harm to children and young people that can be caused by practices linked to culture, faith and beliefs. We promote awareness through training and access to resources.
- 31.0.3** NMT Staff will report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

32 So Called 'Honour' Based Abuse (including Female Genital Mutilation and Forced Marriage)

- 32.0.1** So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- 32.0.2** Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- 32.0.3** NMT Staff are aware of the signs of FGM such as:
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
 - A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
 - A girl has an unexpected or long absence from school.
 - A girl runs away – or plans to run away - from home.
- 32.0.4** NMT Staff understand there is a legal duty to report known cases of Female Genital

Mutilation (FGM) and So Called 'Honour' Based Abuse to the Police and they will do this with the support of a DSL.

- 32.0.5** NMT is aware of the need to respond to concerns relating to forced marriage and understand that it is illegal, a form of abuse and a breach of a learner's rights. The legal age for marriage is now 18 years old. NMT recognise some learners, due to capacity or additional learning needs, may not be able to give an informed consent and this will be dealt with under our child protection processes. Staff can contact the Forced Marriage Unit if they need advice or information. Contact 020 7008 0151 fmu@fco.gov.uk
- 32.0.6** Any suspicions or concerns for forced marriage are reported to the DSL who will refer to First Response or the Police if emergency action is required.

33 Serious Violence

- 33.0.1** All NMT staff are aware of signs and indicators which may signal that learners are at risk from, or are involved with, serious violent crime. These may include increased absence from NMT, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in well-being or signs of assault or unexplained injuries. Staff are aware that unexplained gifts or new possessions could also indicate that learners have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- 33.0.2** There are also a range of risk factors which increase the likelihood of involvement in serious violence such as having been frequently absent or permanently excluded from school, being a child looked after, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

34 Children Potentially at Greater Risk of Harm

- 34.0.1** Children who need a social worker (Child in Need and Child Protection Plans):
- Children may need a social worker due to safeguarding or welfare needs.
 - Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
 - Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.
 - Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

35 Children who are absent from education

- 35.0.1** All staff should be aware that children being absent, particularly repeatedly and/or for prolonged periods, and children missing in education can act as a vital warning sign of a range of safeguarding possibilities.
- 35.0.2** All NMT staff should speak to a DSL if they have concerns and report on CPOMS when necessary.

36 Looked After Children (LAC)

- 36.0.1** NMT recognises that Looked After Children may be more vulnerable and have additional needs.
- 36.0.2** NMT maintains information about the legal status of all children including whether a looked after child is subject to S20 voluntary agreements, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child.
- 36.0.3** NMT will endeavour to reduce barriers faced by LAC's and will provide a safe space for them to speak out or share their concerns with members of staff.

37 Mental Health

- 37.0.1** All NMT staff should be aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.
- 37.0.2** Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem. NMT Staff, however, are well placed to observe their day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.
- 37.0.3** Where young people have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences can impact on mental health, behaviour and education.
- 37.0.4** If staff have a mental health concern about a learner that is also a safeguarding concern:
- Report the concern on CPOMS and talk to a DSL.
 - The record must be factual and not contain staff member opinions.
 - The DSL will provide assess the risk and respond accordingly.

38 Homelessness

- 38.0.1** Being homeless or being at risk of becoming homeless presents a real risk to a child or young adults welfare. The DSLs should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- 38.0.2** Indicators that a family may be at risk of homelessness include:
- Household debt
 - Rent arrears
 - Domestic abuse
 - Anti-social behaviour
 - Sexuality

- The family being asked to leave a property

38.0.3 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 children's social care where a child has been harmed or is at risk of harm.

38.0.4 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.

38.0.5 In most cases NMT staff will be considering homelessness in the context of children 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 a DSL should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

39 County Lines

39.0.1 As set out in the Serious Violence Strategy, published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'.

39.0.2 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

39.0.3 Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

39.0.4 One of the ways of identifying potential involvement in county lines are missing episodes (both from home and NMT), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be made via a social worker or speak to a DSL.

39.0.5 If a staff member suspects a learner is at risk of or involved in county lines:

- The member of NMT staff must record the concern on CPOMS and tell a DSL.
- The record must be factual and not contain staff member opinions.

- The DSL will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will look at availability of local services/third sector providers who offer support to victims of county lines exploitation.

40 Children with additional needs

40.0.1 NMT recognises that while all children have a right to be safe, some children may be more vulnerable to abuse, for example a young carer, a child frequently missing from home/care, children with disabilities or special educational needs, a child living with domestic abuse, parental mental ill health or substance abuse, or a child who has returned home to their family from care.

40.0.2 NMT recognises that additional barriers can exist when recognising abuse and neglect in children with special educational needs or disabilities, medical or physical health conditions.

40.0.3 These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

40.0.4 Any reports of abuse involving children with SEND will therefore require close liaison with the Safeguarding Manager and the relevant SENCO or the named person with oversight for SEND.

40.0.5 NMT will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

40.0.6 If NMT is considering excluding, either fixed term or permanently, a vulnerable child and/or a child who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude.

40.0.7 Where a parent/carer has expressed their intention to remove a child from NMT with a view to educating at home, we work together with Local Authority and other key professionals to coordinate a meeting with parents/carers where possible. We will do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment must be completed prior to convening a meeting of senior management.

41 Children who are lesbian, gay, bisexual, transgender, intersex, queer/questioning, asexual and many other terms (such as non-binary and pansexual) (LGBTIQA+)

- 41.0.1** NMT recognise that whilst the fact that a child or a young person may be LGBTIQA+ is not in itself an inherent risk factor for harm, children who are LGBTIQA+ can be targeted by other children.
- 41.0.2** A child who is perceived by other children to be LGBTIQA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTIQA+.
- 41.0.3** NMT will endeavour to reduce barriers faced by children who are LGBTIQA+ and will provide a safe space for them to speak out or share their concerns with members of staff.

42 Use of Photography

- 42.0.1** NMT often use photographs and film to capture achievements and help promote successes within NMT. Via our website we like to be able to share these events with parents. We are however mindful of the safety of our learners.
- 42.0.2** As confirmed in the Data Protection Act, NMT ensures written consent is sought from the parent or carer of any learner under the age of 18 before any photographs are taken. If consent is given, we will make a clear agreement with the parent or carer as to how the image will be used (for example, in a brochure or website) and how widely (as part of a NMT newsletter for all parents, etc.). Our agreement with parents and learners includes how images will be stored, how long they will be stored for and how they will be disposed of.
- 42.0.3** Due consideration will be given to the appropriateness of clothing and posture, and details such as a learner's name or age will not be shared unless integral to the use of the image (such as the acceptance of an award) in particular when additional identifiers are being shared.
- 42.0.4** We acknowledge the right of parents and learners to withhold or withdraw consent at any point in time of the duration the learner is at NMT.

43 Policy Review

- 43.0.1** The NMT Learning Services and Safeguarding Manager are responsible for ensuring the annual review of this Policy. The date the next review is due is on the front cover of this Policy.

Appendix 1

Herts, Beds & Bucks Contacts	Education Safeguarding Advisory Service	01296 382 732
	Education Safeguarding Advisor	01296 382 912
	First Response Team	01296 383 962
	Safeguarding Adults Team	0800 137 915
	Safeguarding Adults Out of Hours	0800 999 7677
	Local Authority Designated Officer (LADO):	01296 382 070
	BCC Prevent Co-ordinator	01296 382461
	Thames Valley Police	101 (999 in case of emergency)
	Bucks Family Information Service	0845 688 4944
	NSPCC	0800 800 5000
	Childline	0800 11 11
	Kidscape Bullying Helpline	0845 1205 204
	Female Genital Mutilation	0800 028 3550
	Samaritans	0845 790 9090
	Crimestoppers	0800 555 111
Berkshire Contacts	Safeguarding Single Point of Access Emergency Duty Team	01189 373 641 01344 78654
	LADO (Local Area Designated Officer)	01635 503153
	MASH Emergency Duty Team:	01926 414144 01926 886922
Warwickshire Contacts	Warwickshire Safeguarding Board - Children	01926 742510
	First Response Team Out of hours: Out of hours emergency social worker:	01926 414144 01926 886922 01926 886122
	LADO	01926 410410 01926 745376

Appendix 2

