

# MEI Safeguarding and Child Protection Policy 2024-25

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## Safeguarding Roles for the MEI Safeguarding and Child Protection Policy

The MEI Safeguarding and Child Protection Policy makes reference to the following roles.  
For 2024-2025 the people listed below will fulfil these roles within MEI.

Chief Executive

Charlie Stripp

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Deputy Chief Executive

Dr Vanessa Pittard

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Designated Safeguarding Lead

Paul Chillingworth

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Assistant Designated Safeguarding Lead

Cath Moore

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Link Trustee for Safeguarding

Steven Labedz

[steven.labedz@mei.org.uk](mailto:steven.labedz@mei.org.uk)

(When communicating with Steven please put 'MEI Safeguarding' in the email header and include contact details as to how the member of staff may be reached.)

# MEI Safeguarding and Child Protection Policy

In this policy the phrase 'MEI staff' applies to all MEI staff and trustees, and anyone working on behalf of MEI, such as AMSP area coordinators and other contractors

The scope of this policy is to keep safe all children, young people or adults at risk with whom MEI has contact in the course of its work. It is also to provide guidance to all staff about the appropriate ways of working to ensure this obligation is fulfilled.

Throughout the policy 'child' refers to 'child, young person or even an adult at risk'. An 'adult at risk' could be anyone depending upon their circumstances so our duty of care extends to all whom we work.

## Safeguarding Policy and Commitment

Keeping children and vulnerable people safe is everyone's responsibility. In all aspects of MEI's activities, the needs and interests of children and vulnerable groups must be put first. In adopting this policy MEI commits to the following basic rights of the child, young person or adult at risk:

- to be given the support required to be healthy, stay safe, enjoy and achieve through learning, make a positive contribution to society and achieve economic well-being
- to have equal rights to protection from abuse and exploitation
- to expect the support of all adults in their needs for care and protection from harm or abuse
- to be able to study without fear of abuse, harm or neglect

To meet this commitment MEI will:

- respect and promote the rights, wishes and feelings of children, young people or adults at risk
- require employees and representatives to adopt the policy outlined in this document
- train all employees in safeguarding annually
- implement and promote appropriate procedures to safeguard the well-being of children and adults at risk and protect them from abuse
- ensure risks are assessed for all its activities
- use safe practices to recruit employees, induct them to their role, and help them carry out their duties safely including training its employees and representatives to adopt good practice to safeguard and protect children and adults at risk
- ensure employees know how to report any alleged malpractice
- respond to any allegations of misconduct or abuse of a child, young person or adult at risk in line with this policy as well as implementing, where appropriate, the relevant disciplinary and appeals procedures
- monitor, review, evaluate and revise (where necessary) this policy:
  - in line with legislative requirements
  - after an issue relating to the application of the policy
  - or otherwise annually

*This policy was originally written on 03/05/18 and last reviewed in August 2024. It will be reviewed no later than August 2025.*

## Child Protection

[Working Together to Safeguard Children \(Dec 2023\)](#) defines child protection as:

'Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.'

## Reporting a concern

MEI has a Designated Safeguarding Lead (DSL), who will coordinate the organisational response in the case of:

- a child, young person or adult at risk being identified as being at risk of abuse or neglect
- a person reporting to a member of MEI staff that they have been abused or are suffering neglect
- an allegation of abuse made against a member of MEI staff

All initial reports received should be made to the DSL or, if the DSL is unavailable, to the Assistant Designated Safeguarding Lead.

**A report should be made by a member of staff as soon as they become concerned – do not wait for confirmation of the suspicions.**

In our context where we might only see a child a few times, or only online, it would be easy to think that it is not really our place to raise a concern; that that is really the school's job. Or to be reluctant to report a concern since we don't have the kind of extended contact that allows us to decide whether something observed or told is really a problem. However it is always better to report, and that indeed it is our responsibility as much as anyone's to report a concern.

On receiving a report, the DSL will work with the Chief Executive (CE), and other MEI Staff as appropriate, to coordinate the organisational response to the reported information. This is likely to include liaison with statutory and external agencies such as:

- the person's school or college
- local authority children's services
- the NSPCC
- the Disclosure and Barring Service (DBS)
- the police

The DSL will ensure that the initial response is made within 48 hours and will keep appropriate written notes throughout the process.

## The role of the Designated Safeguarding Lead

The role of the designated person(s) is to:

- know which outside agency (police, social services, health services) to contact in the event of a child protection concern coming to the notice of MEI;
- ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover;
- liaise with schools, police, local social services and health services and other agencies as appropriate;
- keep relevant people within MEI informed about any action taken and any further action required;
- ensure that a proper record is kept of any referral and action taken, and that this is kept safely and in confidence;
- provide information and advice on child protection within MEI;
- advise MEI's management committee of child protection training needs;
- review the operation of the child protection policy regularly to ensure the procedures are working and that it complies with current best practice;
- report at least annually to the board of trustees.

## Disclosures

MEI advises that staff follow the [NSPCC guidance](#) on receiving a disclosure of abuse. This states:

- **Listen carefully to what they're saying**  
Be patient and focus on what you're being told. Try not to express your own views and feelings. If you appear shocked or as if you don't believe them it could make them stop talking and take back what they've said.
- **Give them the tools to talk**  
If they're struggling to talk to you, show them [Childline's letter builder tool](#). It uses simple prompts to help them share what's happening and how they're feeling.
- **Let them know they've done the right thing by telling you**  
Reassurance can make a big impact. If they've kept the abuse a secret it can have a big impact knowing they've shared what's happened.
- **Tell them it's not their fault**  
Abuse is never a child's fault. It's important they hear, and know, this.
- **Say you'll take them seriously**  
They may have kept the abuse secret because they were scared they wouldn't be believed. Make sure they know they can trust you and you'll listen and support them.
- **Don't confront the alleged abuser**  
Confronting the alleged abuser could make the situation worse for the child.
- **Explain what you'll do next**  
For younger children, explain you're going to speak to someone who will be able to help. For older children, explain you'll need to report the abuse to someone who can help.
- **Report what the child has told you as soon as possible**  
Report as soon after you've been told about the abuse so the details are fresh in your mind and action can be taken quickly. It can be helpful to take notes as soon after you've spoken to the child. Try to keep these as accurate as possible.
- **Remember** that those who abuse can be of any age (even other children), gender or ethnic background, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place. Potential victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

As soon as practically possible after the disclosure the member of staff should make written notes on the Child Protection Reporting Form (**Appendix 1**) including:

- the date, time and location;
- what the young person said and did;
- any questions asked of the young person and their responses.

The written notes should be passed immediately to the DSL.

It is vital that at no point the member of staff receiving the report promises or implies that they will keep the information provided completely confidential. Explain that it might be necessary to share the information with a colleague in order to ensure the child reporting the abuse is protected.

A member of staff who has any queries relating to Safeguarding and Child Protection procedures at MEI should seek guidance from the DSL. They should also seek guidance if they are worried about a child's behaviour, even if the child has not disclosed. Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL

## Concerns about the DSL

If a member of staff has concerns about the conduct of the DSL (or the assistant DSL) or the DSL (or the assistant DSL) is the subject of the report then this should be reported to the MEI CE or the deputy CE following the same procedures as outlined above. Concerns about the CE (or deputy CE) should be reported to the Trustee responsible for safeguarding.

## Recognising Abuse

All staff should be able to identify the signs of abuse and the impact of abuse and neglect upon children's welfare. Guidance is available on the [NSPCC website](#) and in **Appendix 10**. Further reading is suggested in **Appendix 11**.

Training will be provided on an annual basis and all new staff, including Area Coordinators will be provided with training as part of their induction process. Associates, contracted to do student facing work, are asked annually to confirm that they have read the safeguarding policy and Annex A of KCSIE. They are also asked to complete a few questions about the policy and procedures.

# Your responsibilities

## Keeping up to date

All staff should read the most recent version of the MEI Safeguarding policy on an annual basis and participate in annual training. They should also read Part 1 (or the condensed version in annex A for those who do not have much direct contact with children) of [Keeping children safe in education](#) which is also updated annually. The 2024 version contains some changes from 2023. Those staff supervising and organising staff working with students should also read annex E.

## Risk Assessments

When arranging face to face events involving students a risk assessment (**Appendix 2**) should be completed by MEI staff, Area Coordinators and Associates. When running enrichment events in a school-based setting the school's own risk assessment procedures will be relevant; similarly when co-planning events with another organisation, risk assessment procedures should be considered and agreed jointly. Risk assessments are not required for online tuition but standard procedures are in place to ensure the safety of students and staff (**Appendix 3**). Staff may also want to use the risk assessment form to guide the planning of events with teachers.

## Online events

Guidance has been written for staff running online events, particularly with students during periods of school closures and at other times. This is available in **Appendix 12**.

For AMSP Area Coordinators and Associates running online (enrichment) events for students guidance has been produced for different online platforms. A specific risk assessment should be completed and shared with the Regional Lead. This information is available in the [AC Risk Assessment Documentation area](#).

## **Staff Conduct and Safer Recruitment**

A Staff Code of Conduct (**Appendix 4**) sets out the guidelines that MEI follows in working with children and more generally. MEI adopts a safer recruitment policy (**Appendix 5**) and has procedures in place both for handling any allegations made against its staff (**Appendix 6**) and for keeping records related to any allegations (**Appendix 7**).

## **Social media, photography and other communications**

MEI's Social Media Policy defines social media to be 'a type of interactive online medium that allows parties to communicate instantly with each other or to share data in a public forum'. This definition does not include online learning platforms used by MEI for student tuition.

MEI staff should not initiate or accept any type of communication, such as friend requests, via personal social media from students. This does not preclude students from 'following' MEI social media accounts where there is no one-to-one communication.

Staff should only use a designated work telephone number as a contact number for communications with others including when organising events and this should not be a number used for personal contacts.

Photographs of young people may only be taken and stored in accordance with MEI's Photography Permission Policy (**Appendix 8**). Consent must be sought in advance using the photographic permission forms. (**Appendices 9a and 9b**).

Occasionally MEI receives one-off email correspondence from a young person, for example queries relating to MEI provision or requests for work experience or advice on university entry requirements. In responding to such queries MEI staff must copy an appropriate colleague into their reply. Responses to one-off phone queries from a young person should be brief and factual. If the query requires an extended response, ask the young person to email the query.

## **Data Protection**

MEI retains some data about students in the course of its work. The data are collected, stored and disposed of according to MEI's data protection policy which is compliant with the General Data Protection Regulations (GDPR).

In implementing this policy, MEI has drawn on the guidance in the [NSPCC Safeguarding Standards and Guidance](#) document.

## Safeguarding Adults

MEI has a duty of care that extends to adults as well as children with whom we work. Various legislation sets out the obligation to safeguard adults including Human Rights Act 1998, Care Act 2014, Data Protection Act 2018 and UK General Data Protection Regulations.

The NSPCC and others define 'adults at risk' as being:

- Those with disabilities (seen and unseen) and special needs
- Those who have been in the care system
- Those who are dealing with additional stress
- Those who have experienced an upsetting event
- Victims of abuse

As we won't know who falls into these categories, we should treat everyone as though they could be or could become 'at risk'.

### Principles

The principles underpinning adult safeguarding are:

- Empowerment – people should be encouraged to make their own decisions
- Prevention – take action before harm occurs where possible
- Proportionality – actions need to be appropriate to the risk presented
- Protection – support should be given to those in need
- Partnership – building relationships
- Accountability – safeguarding should be delivered with accountability and transparency.

### Supporting Adults

Our role is to help prevent teachers becoming at risk, by assisting them in meeting their needs and to be vigilant in recognising when they might be at risk.

In order to do this, staff at face to face teacher events should:

- Be aware of reactions to comments and situations
- Be vigilant for the person who withdraws
- Explicitly create an atmosphere of safety
- Be aware of signs and symptoms of abuse (as we do for children)
- Be aware of any unexpected absences or teachers who leave suddenly without communicating their departure.
- Be aware of any additional needs of teachers, such as medical conditions or learning difficulties, and make provision for these where possible.

On application to face to face events, such as study days and conferences, teachers should be asked if they wish to *voluntarily* disclose any

- medical conditions,
- dietary requirements
- access requirements
- learning needs
- possible action to be taken in an emergency.

Local copies of this information, for presenters, may be retained for the duration of the event but should be deleted thereafter.

Teachers attending face to face PD events will be encouraged to keep an ICE (In Case of Emergency) contact number in their mobile phone that can be accessed by emergency services in the event of an emergency. Appropriate wording will be added to joining details for face to face PD events to encourage attendees to keep an ICE contact number on their mobile phone.



## School Visits and Documentation

Paragraph 292 of Keeping Children Safe in Education (KCSIE) 2024 sets out how schools and colleges should treat Agency and third-party staff. "Schools and colleges must obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school or college (or who will be providing education on the school or college's behalf, including through online delivery)."

In performing their roles, MEI Staff and AMSP Coordinators and Associates visit schools and colleges and also engage in online activity with them. It is important therefore to provide the information that schools and colleges need to fulfil their obligations under KCSIE in a timely and concise fashion.

This can be done by providing a letter of assurance which outlines the checks that their employer (either MEI or the AMSP Fundholder) has undertaken. Prior to a school/college visit staff should get in touch with their school/college contact to confirm what documentation is needed. Usually the letter of assurance should be sent in advance of the visit and photographic ID taken on the visit. However practice varies and it is advisable to carry a copy of the letter of assurance on the visit as well. On the rare occasion that it is not possible to provide the information that is needed, it still may be possible for the visit to go ahead, but with supervision from school/college staff members.

The letters of assurance will be issued by the individual's employer. This will be done by MEI HR for MEI Staff and Associates. For Area Coordinators, the letter will be written by the fundholder. Copies of the letters will be held centrally by MEI HR.

A template for the letters has been provided, but in some cases this may need to be amended to take into the individual's length of employment. This is detailed below.

*XXXX is in receipt of an enhanced DBS check, that has been carried out within the last 36 months or subscribes to the DBS update service, which is checked annually. No issues pertaining to their unsuitability to work with children and young people have come to light. Staff are asked to report any incidents that could affect their DBS status immediately.*

*All staff have read the AMSP safeguarding policy and the Keeping Children Safe in Education (KCSIE) Part 1 and Annex E and attend annual safeguarding training. All staff have been informed that they are committing an offence if they are deployed to work with pupils but are disqualified through meeting the 'Disqualification under the Childcare Act 2006'.*

On employment, \_\_\_\_\_ conducted safer recruitment checks including:

- *Identity checks*
- *Right to Work in the UK checks*
- *Relevant qualification/registration checks*
- *Employment history and reference checks*
- *Enhanced DBS check, including Children's Barred List check*
- *Prohibition, sanctions and restrictions check (including a prohibition from teaching check where appropriate).*
- *For those who have lived or worked outside the UK, a criminal records check for time spent abroad.*

## Appendix 1

### Child Protection Reporting Form

This report should be completed immediately following any incident that raises any concern about possible abuse or any other concern about a child, young person or an adult at risk's welfare. It should be completed by any member of staff who has reason to be suspicious about or concerned about the wellbeing of a child (or adult at risk). Care must be taken to report this information accurately and confidentially, referring to MEI's Safeguarding and Child Protection Policy. A copy of this report should be given to the Designated Safeguarding Lead (DSL). This document should be signed by all those completing the report.

*Name of person completing report:*

*Position in relation to the child/ adult at risk:*

*Child/Adult at risk involved:*

*School/Group (if appropriate)*

*Date of report:*

*Time:*

*Adults/students present during the disclosure:*

#### Details of Concern

A record is needed of exactly what the concern is (it is very important that you do not embellish details), what you saw or heard, or an exact record - as far as possible - of anything said to you by the child or adult. Record any relevant comments made by yourself. Please do this as soon as possible after the disclosure (but not during).

Avoid asking any more questions than are necessary to clarify any uncertainties. Please attach your statement and any other necessary information. This might consist of an email trail, other staff statements and notes of concern.

Signed:

Position:

Reported to Designated Safeguarding Lead at

(time) on

(date)

Action taken:

## Appendix 2

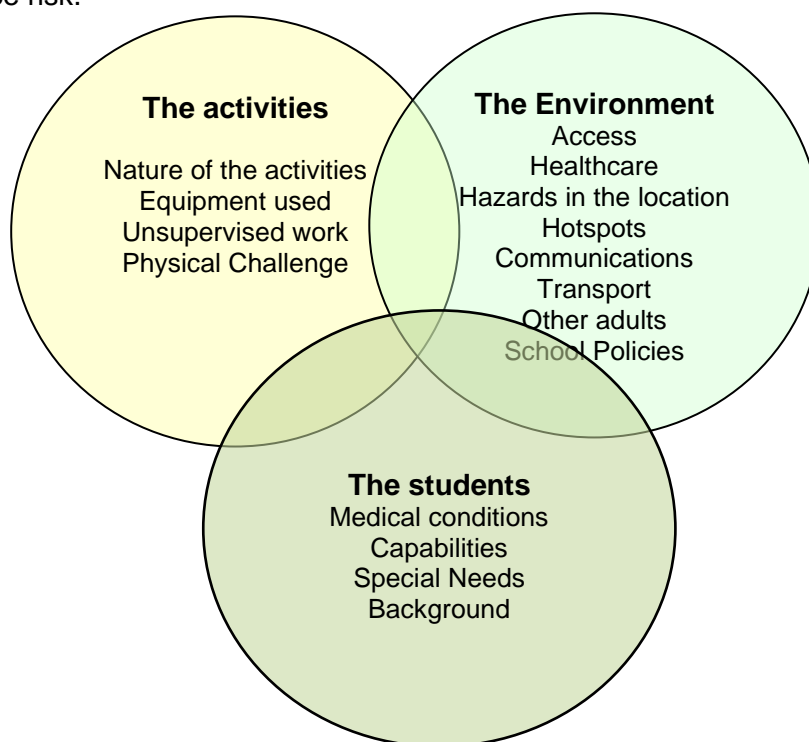
### Risk Assessments

Risk assessment is about ensuring that clear thinking about health and safety takes place. Systematic recording and thinking will minimise risk and ensure that event organisers act in the interests of students' health and safety. It is about weighing up the balance of probabilities. It does not need to cater for every last possible thing that can go wrong. It is about analysing and bringing together three broad areas that influence risk.

A risk assessment is required for any activity where any of these three elements might be unfamiliar e.g. a location unfamiliar to students or an activity that they would not normally engage in.

This would usually be the case where groups of students are visiting a central location, such as another school for a competition or an enrichment event.

Whilst the event organiser may have a good understanding of the nature of the activities and the environment, they will need to ask schools about the needs of the students in order to fully evaluate the risks.



Organisers may also need help from schools to assess risks from transport. It may be appropriate to send the risk assessment to a school colleague and ask them to complete part of it. Equally school coordinators may ask to see MEI's risk assessment before gaining approval for the trip from their line managers.

It is important that any staff who will be responsible for supervising students (regulated activity) have a current (last three years) enhanced DBS check and safeguarding training.

Organisers of events for teachers should also consider whether they need to complete a risk assessment. It is recommended that they do so and should always ask about dietary and medical requirements; it is also possible that some adults will have disabilities or other needs that need to be taken into consideration when planning events.

A proforma for completing risk assessments is provided below. For each risk identified, please give a control measure to say how that risk will be mitigated. The control measures will then inform your actions in preparing for the event and how students and staff are briefed. In particular, external speakers need to be fully briefed about their role and conduct.

Any incidents that arise at an event should be reported to the Regional Lead and the MEI Designated Safeguarding Lead (DSL). The knowledge of such incidents can be used in developing further guidance. Staff can contact the DSL for advice in writing a risk assessment.

A separate document [Guidance for completing the MEI/AMSP Safeguarding Risk Assessment – Online Student Enrichment \(AC organised events\)](#) gives guidance for planning one-off events online.

## MEI/AMSP Risk Assessment

Location:
Activities to be undertaken (specify whether participants will be supervised throughout):
Date of activity:
Name(s) of organiser and activity leader:
Group size and age range:
Staff involved in activity and their roles:
<p>Please indicate whether staff will need an enhanced DBS check for this activity. Record whether they have undergone such a check in the last 3 years. For staff who do not have such a check please outline why this is not necessary, noting supervision arrangements. Also check whether staff have undergone safeguarding training this academic year.</p>

Record here any risks associated with the activity and the measures introduced to minimize their impact ( <i>include any procedures and measures such as social distancing to minimise transmission of Covid-19</i> ).	
Risk	Control measures

Using the information sent to you by participants, record here any considerations that need to be taken into consideration so that they can participate in the activity.

Participant Considerations

Individual Needs	Allergies/Asthma	Dietary	Other

Action to be taken in case of emergency

Considerations: communications / access & exit points / medical assistance – nearest hospital / group supervision / equipment

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Points for staff/participant briefing (including any social distancing).


Signed: (Leader)		DATE:	
	Sent to Regional Lead	DATE:	
	Sent to participating schools	DATE:	

## Appendix 3

### Online Tuition of Students

This appendix sets out ways of working for online tutors in all MEI activity. These procedures are also included in tutors' handbooks and induction processes. The ways of working are designed to safeguard both the students and the online tutor.

- All online tuition is to be conducted using the BigBlueButton or Zoom classroom provided by MEI for the designated course. These classrooms should be set up so that the tutor can monitor all interactions (e.g. for BBB, private chat should be disabled and lock setting on entry applied).
- Every session should be recorded. Tutors should include a prompt to record the session in their slides.
- Communication with students prior to and after the lesson should ideally be via email, using the email addresses provided at registration. In all communications tutors are required to copy in an email such as [tuition@amsp.org.uk](mailto:tuition@amsp.org.uk) or [hpls@amsp.org.uk](mailto:hpls@amsp.org.uk) as appropriate. Social media must not be used. Integral forums, if used, should not permit private messaging or a manager should be able to monitor posts.
- Tutors should use their MEI-provided AMSP email address in all communications with students. They should not use a personal email address or give out phone numbers.
- Tutors should follow the code of conduct for all MEI staff set out in Appendix 4.
- If tutors have any concerns about the behaviour of students in a session or if they receive communication from students that causes concern, they should contact the activity coordinator and the DSL.
- The activity coordinator will review the recordings of at least one online session, chosen at random each year, for every tutor. The activity coordinator should briefly visit online sessions on a regular basis.
- All tutors engaged in online activity on MEI's behalf must have an enhanced DBS and barred list check and have undertaken safeguarding training (either with MEI or their employer) in the academic year in which they are working. This applies to all tutors regardless of whether they are paid by MEI including those employed through 3<sup>rd</sup> parties.
- On enrolment in online activity, students and schools will be informed about the safeguards and pre-appointment checks that MEI has in place for online tuition. They will also be informed about what to do if they wish to report a concern or if they feel uncomfortable in a lesson. This will be outlined in the agreement. School contacts will be sent information about online tutors (this will include a short biography of each tutor and a description of the checks that have been carried out by MEI).
- Should an allegation against an online tutor be made, then the procedures outlined in Appendix 6 will be followed.

## **Appendix 4**

### **Staff Code of Conduct**

MEI expects all personnel (both volunteers and paid staff) to be aware of this Code of Practice and adhere to its principles in their approach to all children and adults at risk.

#### **Visiting Schools**

MEI staff, including Associates and Area Coordinators, running events in schools or colleges should follow the safeguarding procedures at that institution.

They should take with them an appropriate form of photo ID and ascertain what information and checks the school requires ahead of the visit, such as a letter of assurance.

On arrival at school, staff will usually be asked to read the safeguarding policy and be made aware of who to contact at the school should they have a concern. Staff should note these details.

In the event that staff are not made aware of who to contact and a concern arises, they should contact reception and ask for the safeguarding lead.

#### **Events outside of school to which students are invited**

Where students are invited to events at another venue, e.g. a university or another school, it is the responsibility of the accompanying teacher to ensure that they are familiar with the safeguarding arrangements.

The event organiser should communicate this information ahead of the event, including to whom any safeguarding concerns should be reported.

The organiser should inform teachers that any concerns about the event organiser should be reported to the AMSP DSL via [safeguarding@mei.org.uk](mailto:safeguarding@mei.org.uk)

In the event of a report, the person handling the report should ensure that the school is kept fully informed and contact the school designated safeguarding officer to inform them of any actions taken.

Where students attend an event without a teacher, such as a Saturday problem-solving class, then the event organiser is responsible for safeguarding arrangements and communicating who to contact in the event of a concern.

#### **External Speakers**

Where an external speaker is used at an event, the organiser must make them aware of MEI's Safeguarding and Child Protection Policy and send them a copy of the Staff Code of Conduct prior to the event.

## Code of Conduct for Staff - Safeguarding

- All one-to-one meetings with individual students should take place in publicly accessible areas, and it is important that no more time should be spent alone with them than is necessary.
- Email is the preferred method of communication and an appropriate colleague or [safeguarding@amsp.org.uk](mailto:safeguarding@amsp.org.uk) or [safeguarding@mei.org.uk](mailto:safeguarding@mei.org.uk) must be copied into the communication. Avoid communicating with students by phone, text or social media.
- Staff who communicate regularly with students should use an MEI or AMSP email account.
- Do not have physical contact with students, unless it is to help in an emergency.
- Do not take students alone in car journeys, however short.
- Do not make suggestive or inappropriate remarks to or about students, even in fun, as this could be misinterpreted.
- Do not share details of personal social media accounts with students and do not share information about students via social media.
- Do not share personal or work mobile telephone numbers with students.
- Do not accept friend requests from students.
- Do not store images of students on personal equipment, such as mobile phones.

It is important not to deter children from making a 'disclosure' of inappropriate action through fear of not being believed, and to listen to what they have to say. Guidance on handling a disclosure is set out in the MEI Safeguarding and Child Protection Policy. If this disclosure gives rise to a child protection concern it is important to follow the procedure for reporting such concerns, and not to attempt to investigate the concern yourself.

Remember that those who abuse children can be of any age (even other children), gender or ethnic background, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.

Good practice includes valuing and respecting children as individuals, and all personnel showing appropriate conduct – which will always exclude bullying, shouting, racism, sectarianism or sexism (in accordance with MEI's Equality, Diversity and Inclusion Policy).

If you have any questions about this code of conduct, please contact the MEI DSL via [safeguarding@mei.org.uk](mailto:safeguarding@mei.org.uk) as this may not cover all eventualities.



## Appendix 5

### Safer recruitment policy

Individuals with suspicious motives deliberately target organisations that give them easy access to children. A robust recruitment process helps prevent this. MEI's commitment to safeguarding children will be clear and explicit at every stage of recruitment. The aim is deter unsuitable candidates, as much as to recruit suitable ones.

MEI has procedures in place to establish safer recruitment practice ensuring the suitability of the people who deliver and administer its programmes. These are detailed in the MEI appointments and recruitment policy updated in August 2024 and in the MEI policy and procedures document 'Operation of safer recruitment checks' first published in February 2020. A range of safer recruitment checks will be made in the event of an individual being offered a position.

These include, for staff who have direct contact with children and adults at risk:

- proof of identity and right to work in the UK
- an enhanced DBS with barred list check
- direction, prohibition or restriction issued by the General Teaching Council for England, the General Teaching Council for Scotland, the Education Workforce Council, the General Teaching Council for Northern Ireland, or any predecessor bodies (as applicable)
- verification of relevant qualifications listed on application form
- criminal record checks or 'Certificates of Good Character' to identify any non-UK criminal records are checked for any applicant who has previously been resident outside the UK
- two satisfactory references
- online checks

Job adverts, and recruitment briefs (e.g. if MEI recruits via an agency) will include a statement about MEI's commitment to safeguarding: "MEI is committed to safeguarding and promoting the welfare of the young people that it serves. All our staff share this commitment and have a role to play in safeguarding. Successful applicants will be subject to comprehensive set of pre-employment checks."

When conducting interviews, one of the panel members must have completed safer recruitment training. For any child-facing roles, second-stage interviews will be held in person and questions related to safeguarding will be asked. Candidates will also complete a self-disclosure form.

#### DBS Checks for existing staff

MEI will undertake appropriate DBS checks on existing staff every 3 years. The level of check that is required for different roles is set out in the MEI 'Operation of safer recruitment checks' policy. Once a DBS check is due, from September 2023, staff will be strongly encouraged to subscribe to the DBS update service.

#### AMSP partners & sub-contractors

MEI requires all AMSP partners and other sub-contractors to adopt the same practices as MEI and these are written into funding agreements. These include ensuring that all staff working on behalf of MEI are DBS checked and that they have the same safeguarding training as MEI staff.

## **Appendix 6A**

### **Procedures to be followed where allegations are made against staff**

Where an allegation is made against a member of staff, suspension will only be initiated by the CE, or the deputy CE.

Suspension should be regarded as a neutral act, applied for the protection of all parties involved. Any suspension initiated as a response to a safeguarding concern is not a disciplinary suspension but one imposed as a requirement of MEI's safeguarding policy. The suspension will remain in place until the matter has been determined.

Suspension would usually be from all MEI activities, but this will be determined by the CE, or deputy CE. Details about a suspension will be treated confidentially and only be shared with those who have a justified need to know. All relevant records will be stored appropriately.

The member of staff concerned will be advised in writing of the suspension and its scope. A liaison person will be appointed who will be the point of contact for the person suspended.

If the matter is reported to the police or other relevant agencies then they will conduct their own investigations. If there is no police action then MEI can take further steps and the matter will be dealt with in line with MEI procedures.

#### **Termination of suspension**

The outcome of a suspension will be any of the following:

- reinstatement with no case to answer
- reinstatement with appropriate strategy in place
- disciplinary action in accordance with disciplinary procedures (MEI Disciplinary Policy)
- summary dismissal

#### **Conduct once suspended**

Once suspended a member of staff should cooperate as far as possible with any investigation. They should not discuss the matter with anyone involved in the allegation apart from those formally advising and supporting them. They should not take part in any activity from which they have been suspended.

The procedure for to be followed should an allegation be made is set out in the flowchart on page 19.

## Appendix 6B

### Low-level concerns

MEI aims to promote an open and transparent culture in which all concerns about all adults working on behalf of MEI **with children, young people and vulnerable adults** are dealt with promptly and appropriately. It is desirable to identify inappropriate, problematic or concerning behaviour early and to ensure that staff are clear about professional boundaries and act within these boundaries.

The term 'low-level' concern does not mean that it is insignificant. 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 may have acted in a way that is inconsistent with the staff code of conduct (**Appendix 4**), including inappropriate conduct outside of work, but is not serious enough to consider a referral to external bodies.

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

- being over friendly with children
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children, young people or vulnerable adults

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

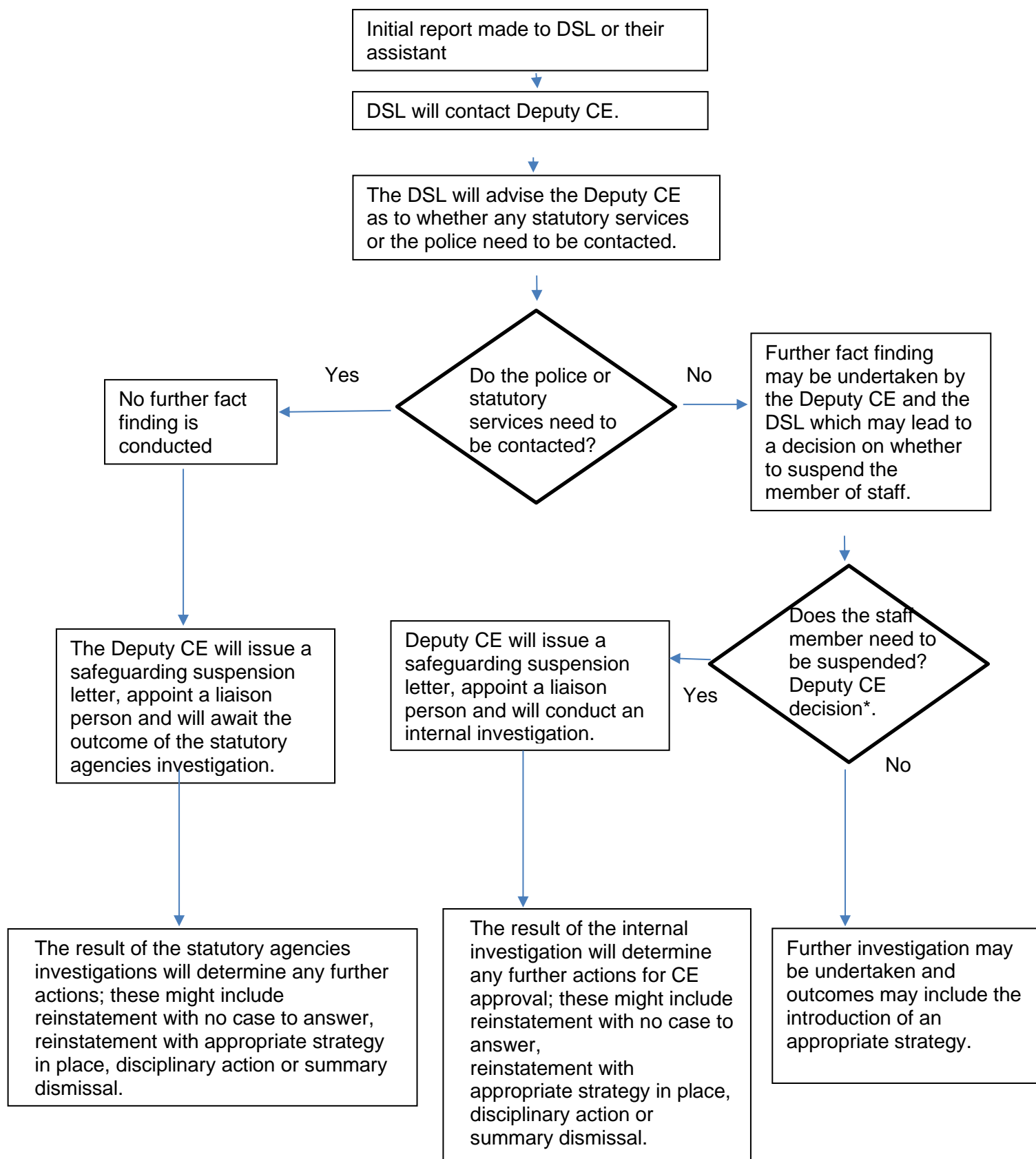
The procedure for reporting a low-level concern will follow the flowchart on the next page. All concerns should initially be reported in confidence to the DSL.

The DSL will inform the deputy CE about low-level concerns in a timely fashion according to the nature of each particular low-level concern. The deputy CE and CE will be the ultimate decision makers in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, they may wish to consult with the DSL and take a more collaborative decision making approach. They will also consider any previous concerns that might have been raised.

Record keeping relating to concerns about a member of staff's behaviour are set out in Appendix 7.

Where allegations are made against a person working on behalf of MEI, but not directly employed by MEI, the DSL and deputy CE will contact the DSL in the organisation that employs the person to pass on those concerns and agree joint actions. This would be the case for AMSP Area Coordinators, for example.

**Flowchart for procedure to be followed in the case that a safeguarding concern is expressed about a member of staff**



\* In the absence of the Deputy CE, this decision will be made by a delegated member of SLT

## **Appendix 7**

### **Record keeping**

Information about child protection concerns and referrals will be kept in a separate child protection file for each child. Electronic communications will be printed out and will be kept in a secure locked location at the MEI Office by the DSL and a log kept of who has accessed them. Any email records will be deleted once they are no longer required for immediate action. Records relating to child protection will be kept for 7 years after MEI's last contact with the child, their school or family. The location of these records will also be known to the ADSL and the MEI Deputy CE and they also have access to them.

Records relating to concerns about a member of staff's behaviour (including the DSL and ADSL) will be kept in the person's confidential personnel file by Human Resources and a copy will be given to the individual. If concerns have been raised about an adult's behaviour around children, MEI will keep the records in their personnel file either until they reach normal retirement age or for 10 years - whichever is longer. The records will be kept for the same amount of time regardless of whether the allegations were unfounded. However, if the allegations are malicious MEI will destroy the record immediately. Information will be kept for this length of time even if the person stops working or volunteering for MEI.

## Appendix 8

### MEI Photography Permission Policy

This policy refers to all events organised by, or on behalf of MEI, for students under the age of 18, including those organised by Area Coordinators and Associates. It also applies in cases where some, but not all, students attending are aged 18 and over.

'Photography' refers to any photographs or other images such as video recordings, taken with any device including mobile phones. This document has been drafted to align with the [NSPCC guidance](#).

On occasions MEI may send a professional photographer to events to take pictures for stock images and publication or to record videos; on these occasions an enhanced level of permission should be sought. There is a different permission form for this purpose as is explained below.

#### Potential risks

Some of the potential risks of photography and filming at events include:

- students may be identifiable and the context of the photograph may mean that personal information could be inferred from it, for example the school they attend;
- direct and indirect risks to students when photographs are shared on websites and in publications alongside personal information;
- inappropriate photographs or recorded images of students;
- inappropriate use, distribution, adaptation or copying of images.

#### Photography guidance

The taking of photographs of students at events should be kept to a minimum. If photographs are to be taken, then permission needs to be obtained and verified for each student attending. If any student has not given permission, then the organiser should ensure that no photos are taken at that event that could inadvertently feature such a student. Do not upload any images to social media accounts (there may be occasions where video will be used and images uploaded to the official MEI and AMSP accounts but separate permission will be obtained for this and this will usually be for a specific purpose, for example a professional development video).

If an organiser wishes to take photographs of students at an event:

- they would normally use the MEI Photography Permission Form (MEI Form 0133 – see appendix 9a) to obtain consent from parents / guardians for a student to be photographed. This form will make clear the reasons why the photographs are being taken. It will also obtain the student's permission to use their image and explain how the images will be used. Students should be allowed the opportunity to 'opt out'. Each event will have an ID (allocated by GEMS or SPIRIT) and this should be used to label the images; if there is no such ID then the images should be labelled to reflect the date, location and event.
- they can use the MEI Photography and Video Permission Form (MEI Form 0134 – see appendix 9b) for photo/video shoots which have been pre-arranged with a school/college;
- only take photographs of children in suitable clothing to reduce the risk of inappropriate use, avoid skimpy clothing and large areas of exposed skin;

- do not use student's names or individual personal information in photograph captions; be aware of name badges and other items that might identify a student;
- photography sessions outside of organised events, such as at the child's home, are not permitted;
- if an event is being jointly held with another institution, such as a host university, who wish to use photographs of the students, then that institution needs to seek permission for their use separately; do not pass images onto third parties.

## **Storage of images**

Photographs and videos and other media in which individuals can be identified are viewed legally as personal data, and must be taken, stored and used in line with MEI's GDPR Policy.

This means:

They can be used only for the purpose they were taken, and no other purpose.

They must not be held longer than necessary.

They must be destroyed if the student or parent asks for them to be destroyed.

They must be held, and disposed of, securely.

It is preferable to use institutional cameras and devices to take photographs rather than personal equipment, but it is where the images are stored that is the main consideration. Images should not be stored permanently on devices or on mobile phones.

It is suggested that those running events use an SD card for storing images. This means that a personal device could be used as the photographs could be saved directly to the SD card, not on the device.

Images of children must be kept securely and must not be shared with others outside of MEI. Small numbers of images may be emailed for the purposes of writing newsletters, for example.

Once the images have been used for their intended purpose, they should be deleted. There is no need to retain images in the long term if they are no longer being used. Stock images may be kept for a maximum period of 24 or 36 months, according to the permission form used. It is the responsibility of AMSP Regional Leads and MEI Strand Leaders to remind staff to check that they are not retaining images and seek confirmation of this.

Do not print hard copies unless it is part of a recognised publication such as a brochure or newsletter.

## **MEI Stock Photographs and Competitions**

From time to time MEI may wish to take photographs of events for the purpose of using the photographs for significant publications. A stronger level of permission will be sought for such events and the MEI Photography and Video Permission Form (MEI Form 0134– see appendix 9b) will be used. On occasions pictures of the competition winners, along with their names will be published and individual permission will be sought for this by writing to the individuals concerned.

## Appendix 9a (MEI Form 0133)

### MEI Photography Permission Form

Dear Parent/Guardian/Carer

We are looking forward to welcoming your child to the <event> on: <date> at <venue>.

This event involves a range of mathematical workshops and activities, and offers students the opportunity to share in their enjoyment of mathematics. Photographs of students participating may be taken and may be used in news items and reports about the event and to publicise similar events in the next 24 months.

MEI's Photography Permission Policy is available at <http://mei.org.uk/safeguarding>. Images are stored according to current data protection regulations. Images may be used by MEI in print or online.

If you are happy for your child to have their photograph taken, please sign below. We also request that your child provides their own consent by signing below.

Yours sincerely

<Name of event organiser>

Conditions for use of photographic images:

- 1 If we use photograph of individuals or small groups of young people, we will avoid using their name or personal details in the accompanying text or caption. We may use group photographs with very general captions.
- 2 You may withdraw your consent at any time by writing to MEI, Monckton House, Epsom Centre, White Horse Business Park, Trowbridge, Wiltshire, BA14 0XG.
- 3 MEI cannot accept any liability for any loss, damage or personal injury, howsoever caused, through use of the images by third parties.

Please detach and complete the reply slip below and return to school.

-----

Name of student: \_\_\_\_\_

I hereby give permission for the student to take part in the event on <date> at <venue>.

I also give permission for photographs of my child to be taken and used in reports about the event and to publicise future such events in the next 24 months.

Signature of Parent/Guardian: \_\_\_\_\_

I consent to allowing my photograph to be taken at the above event.

Signature of student: \_\_\_\_\_

Event ID: <ID>



## Appendix 9b (MEI Form 0134)

### MEI Photography & Video Permission Form

Dear Parent/Guardian/Carer

We would like your child to take part in a photography shoot and/or the filming of a video.

Photographs and videos of students participating in different activities will be taken. These may be used for marketing and publicity purposes, including in brochures and on websites, and for the professional development of teachers. The images may be retained for a period of 36 months and used as stock images to publicise future events.

MEI is an educational charity. MEI's Photography Permission Policy is available at <http://mei.org.uk/safeguarding> and images are stored according to current data protection regulations. If you are happy for your child to have their photograph taken or be filmed and for the images or video to be used as stated, please sign below. We also request that your child provides their own consent by signing below.

Yours sincerely

<Name of event organiser>

Conditions for use of photographic images:

- 1 If we use photograph of individuals or small groups of young people, we will avoid using their name or personal details in the accompanying text or caption unless we have sought specific permission to do this. We may use group photographs with very general captions.
- 2 You may withdraw your consent at any time by writing to MEI, Monckton House, Epsom Centre, White Horse Business Park, Trowbridge, Wiltshire, BA14 0XG.
- 3 MEI cannot accept any liability for any loss, damage or personal injury, howsoever caused, through use of the images by third parties.

Please detach and complete the reply slip below and return to school.

-----

Name of student: \_\_\_\_\_

I give permission for photographs and video recordings of my child to be taken for publicising future events, in marketing and in professional development materials. This includes the use in brochures, on websites. I understand that images may be retained for a period of 36 months and used as stock images to publicise future events.

Signature of Parent/Guardian: \_\_\_\_\_

I consent to allowing my photograph to be taken or to being video recorded at the above event.

Signature of student: \_\_\_\_\_

Event ID: <ID>

Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. Neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.

Listed below are different forms of abuse along with signs of identification. More is available on the [NSPCC website](#).

### **Domestic Abuse**

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes emotional, physical, sexual, financial or psychological abuse.

Abusive behaviour can occur in any relationship. It can continue even after the relationship has ended. Both men and women can be abused or abusers.

Domestic abuse can seriously harm children and young people. Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

It's often difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around.

Children who witness domestic abuse may:

- become aggressive
- display anti-social behaviour
- suffer from depression or anxiety
- not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

Things you may notice include being withdrawn suddenly, behaving differently, being anxious, clingy, depressed or aggressive.

### **Sexual Abuse**

A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact and it can happen online. Sometimes the child won't understand that what's happening to them is abuse.

They may not even understand that it's wrong. Or they may be afraid to speak out.

Children who are sexually abused may:

- stay away from certain people
- avoid being alone with people, such as family members or friends

- seem frightened of a person or reluctant to socialise with them.
- show sexual behaviour that's inappropriate for their age
- become sexually active at a young age or promiscuous
- use sexual language or know information that you wouldn't expect them to.
- have physical symptoms such as soreness, an STD or pregnancy

## Neglect

Neglect is the ongoing failure to meet a child's basic needs and is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care.

A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents. A child who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

There are 4 types of neglect:

Physical neglect- Failing to provide for a child's basic needs such as food, clothing or shelter. Failing to adequately supervise a child, or provide for their safety.

Educational neglect- Failing to ensure a child receives an education.

Emotional neglect- Failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. It's often the most difficult to prove.

Medical neglect- Failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

Neglect can be really difficult to identify, making it hard for professionals to take early action to protect a child. Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. But if you notice multiple, or persistent, signs then it could indicate there's a serious problem:

- Poor appearance and hygiene. They may:
  - be smelly or dirty
  - have unwashed clothes
  - have inadequate clothing, e.g. not having a winter coat
  - seem hungry or turn up to school without having breakfast or any lunch money
- Health and development problems. They may have:
  - untreated injuries, medical and dental issues
  - repeated accidental injuries caused by lack of supervision
  - recurring illnesses or infections
  - not been given appropriate medicines
  - missed medical appointments such as vaccinations
  - poor muscle tone or prominent joints
  - skin sores, rashes, flea bites, scabies or ringworm
  - thin or swollen tummy
  - anaemia
  - tiredness

- faltering weight or growth and not reaching developmental milestones (known as failure to thrive)
- poor language, communication or social skills
- Housing and family issues. They may be:
  - living in an unsuitable home environment or not having any heating
  - left alone for a long time
  - taking on the role of carer for other family members.

## Online abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

A child may be experiencing abuse online if they:

- spend lots, much more or much less time online, texting, gaming or using social media
- are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

## Physical abuse

Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It is not accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness (FII).

Bumps and bruises don't necessarily mean a child is being physically abused – all children have accidents, trips and falls. There isn't one sign or symptom to look out for that will say a child is definitely being physically abused. But if a child often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated.

Physical signs include:

- Bruises
  - commonly on the head but also on the ear or neck or soft areas - the abdomen, back and buttocks

- defensive wounds commonly on the forearm, upper arm, back of the leg, hands or feet
- clusters of bruises on the upper arm, outside of the thigh or on the body
- bruises with dots of blood under the skin
- a bruised scalp and swollen eyes from hair being pulled violently
- bruises in the shape of a hand or object.
- Burns or scalds
  - can be from hot liquids, hot objects, flames, chemicals or electricity
  - on the hands, back, shoulders or buttocks; scalds may be on lower limbs, both arms and/or both legs
  - a clear edge to the burn or scald
  - sometimes in the shape of an implement for example, a circular cigarette burn
  - multiple burns or scalds.
- Bite marks
  - usually oval or circular in shape
  - visible wounds, indentations or bruising from individual teeth.
- Fractures or broken bones
  - fractures to the ribs or the leg bones in babies
  - multiple fractures or breaks at different stages of healing
- Other injuries and health problems
  - scarring
  - effects of poisoning such as vomiting, drowsiness or seizures
  - respiratory problems from drowning, suffocation or poisoning

## Emotional abuse

Emotional abuse is the ongoing emotional maltreatment of a child. It is sometimes called psychological abuse and can seriously damage a child's emotional health and development. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them.

Children who are emotionally abused are often suffering another type of abuse or neglect at the same time – but this isn't always the case.

It can be difficult to recognise emotional abuse and children may not always realise they are experiencing it.

But there may be indicators in the way a child behaves and reacts to certain situations. Children who have been emotionally abused may:

- lack confidence and have low self-esteem
- be withdrawn and very quiet
- experience mental health issues
- have a language delay
- struggle to focus and concentrate on tasks
- struggle to make or maintain relationships
- display behaviour perceived to be aggressive or hostile
- seem isolated from their parents, carers and peers
- lack social skills or have few, if any, friends.

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

When sexual exploitation happens online, young people may be persuaded, or forced, to: send or post sexually explicit images of themselves; take part in sexual activities via a webcam or smartphone; have sexual conversations by text or online. Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may:

- go missing from home, care or education.
- be involved in abusive relationships, intimidated and fearful of certain people or situations
- hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- associate with other young people involved in sexual exploitation
- get involved in gangs, gang fights, gang membership
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- not know where they are, because they have been moved around the country
- be involved in petty crime such as shoplifting
- have unexplained physical injuries
- have a changed physical appearance, for example lost weight.

## **Female Genital Mutilation**

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. There are no medical reasons to carry out FGM. It does not enhance fertility or make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

A girl at immediate risk of FGM may not know what is going to happen. But she might talk about or you may become aware of:

- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

## **Breast Ironing / Breast Flattening**

Breast Ironing is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order to delay the development of the breasts or cause them to disappear entirely. A girl who is undergoing this process may:

- be embarrassed about her body
- refer to pain or discomfort in the chest area, without specifics

## **Bullying and Cyberbullying**

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Bullying includes: verbal abuse, such as name calling and gossiping; non-verbal abuse, such as hand signs or text messages; emotional abuse, such as threatening, intimidating or humiliating someone; exclusion, such as ignoring or isolating someone; undermining, by constant criticism or spreading rumours; controlling or manipulating someone; racial, sexual or homophobic bullying; physical assaults, such as hitting and pushing; making silent, hoax or abusive calls; online or cyberbullying.

Cyberbullying includes: sending threatening or abusive text messages; creating and sharing embarrassing images or videos; 'trolling' - the sending of menacing or upsetting messages on social networks, chat rooms or online games; excluding children from online games, activities or friendship groups; setting up hate sites or groups about a particular child; encouraging young people to self-harm; voting for or against someone in an abusive poll; creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name; sending explicit messages, also known as sexting; pressuring children into sending sexual images or engaging in sexual conversations.

It can be hard for adults to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault. You can't always see the signs of bullying. And no one sign indicates for certain that a child is being bullied. But you should look out for:

- belongings getting "lost" or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

## **Child trafficking**

Child trafficking and modern slavery are child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. Children are trafficked for:

- child sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft.

Signs that a child has been trafficked may not be obvious but you might notice unusual behaviour or events. These include a child who:

- spends a lot of time doing household chores
- rarely leaves their house, has no freedom of movement and no time for playing
- is orphaned or living apart from their family, often in unregulated private foster care
- lives in substandard accommodation
- isn't sure which country, city or town they're in
- is unable or reluctant to give details of accommodation or personal details
- might not be registered with a school or a GP practice
- has no documents or has falsified documents
- has no access to their parents or guardians
- is seen in inappropriate places such as brothels or factories
- possesses unaccounted for money or goods
- is permanently deprived of a large part of their earnings, required to earn a minimum amount of money every day or pay off an exorbitant debt
- has injuries from workplace accidents
- gives a prepared story which is very similar to stories given by other children.

## **Grooming**

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.

Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed or that what has happened is abuse.

The signs of grooming aren't always obvious and groomers will often go to great lengths not to be identified. If a child is being groomed they may:

- be very secretive, including about what they are doing online
- have older boyfriends or girlfriends
- go to unusual places to meet friends
- have new things such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol.



## **Child on child abuse**

All staff should be 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 school or college and online. All staff should be clear as to the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

Staff should understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- 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).

## **Non-recent abuse**

Non-recent child abuse, sometimes called historical abuse, is when an adult was abused as a child. Sometimes adults who were abused in childhood blame themselves or are made to feel it’s their fault. The person might have known that they were abused for a very long or only recently learnt or understood what had happened to them.

The effects can be short term but sometimes they last into adulthood. If someone has been abused as a child, it’s more likely that they’ll suffer abuse again. This is known as revictimisation.

The long term effects of abuse and neglect can include:

- emotional difficulties like anger, anxiety, sadness or low self-esteem
- mental health problems like depression

- eating disorders,
- self harm or suicidal thoughts
- problems with drugs or alcohol
- disturbing thoughts, emotions and memories
- poor physical health
- struggling with parenting or relationships.

If an adult was abused as a child, they deserve to be believed and to get support if they wish. NAPAC is the National Association for People Abused in Childhood. NAPAC's trained staff speak with survivors of any type of childhood abuse over the phone, exploring the options available to them such as support groups and counselling. They also support family members, friends and professionals who are helping someone who was abused, advising them on who else can help.

## **Criminal Exploitation**

Criminal exploitation occurs when children and young people are manipulated and coerced into committing crimes. Often this is through a 'gang'. There are different types of gang and not every gang is criminal or dangerous. However, gang membership can be linked to illegal activity, particularly organised criminal gangs involved in trafficking, drug dealing and violent crime.

County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or "deal lines". Children as young as 12 years old have been exploited into carrying drugs for gangs. This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs.

A child or young person might be recruited into a gang because of where they live or because of who their family is. They might join because they don't see another option or because they feel like they need protection. Children and young people may become involved in gangs for many reasons, including peer pressure and wanting to fit in with their friends; feeling respected and important; being protected from other gangs, or bullies or they want to make money and are promised rewards.

A child is more at risk of exploitation if they have been excluded from school, have special educational needs or poor mental health. They also are vulnerable if they are already being abused, such as at home or live in an area where gangs are prevalent.

As children involved in gangs often commit crimes themselves, sometimes they aren't seen as victims despite the harm they have experienced. It's important to spot the signs and act quickly if you think a child is being groomed or is becoming involved with a gang. Signs include:

- Frequently absent from and doing badly in school.
- Going missing from home, staying out late and travelling for unexplained reasons.
- In a relationship or hanging out with someone older than them.
- Being angry, aggressive or violent.
- Being isolated or withdrawn.
- Having unexplained money and buying new things.
- Wearing clothes or accessories in gang colours or getting tattoos.
- Using new slang words.
- Spending more time on social media and being secretive about time online.
- Making more calls or sending more texts, possibly on a new phone or phones.
- Self-harming and feeling emotionally unwell.
- Taking drugs and abusing alcohol.
- Committing petty crimes like shop lifting or vandalism.
- Unexplained injuries and refusing to seek medical help.

## Appendix 11

### Links to recommended reading and relevant guidance

[Keeping children safe in education \(DfE 2024\)](#)

[Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children \(DfE Dec 2023\)](#)

[How safe are our children? \(NSPCC 2020\)](#)

[NSPCC Safeguarding Standards and Guidance](#)

[Contextual Safeguarding Toolkit \(University of Bedfordshire\)](#)

# Safeguarding and the online classroom

**The following principles should be observed**

- Safeguarding is everyone's responsibility;
- Everyone in the classroom should be identifiable;
- There must be robust supervision to track interactions;
- Everyone needs to understand the expected behaviours and how to report any transgressions;
- Systems used should be cloud-based and secure.

## Guidance for staff

- Instruct students joining the session to be muted initially.
- If you wish students to use webcams, clarify with students the ground rules such as making sure that they are suitably dressed and in an appropriate environment. Do not insist on their use as some students may not have a suitable place in the home that they are comfortable with sharing.
- All sessions with students participating as individuals should be recorded and the location of the recording needs to be known to your line manager. Make sure that students are aware that the recording has started. Once courses have finished recordings should be archived or deleted in accordance with the stated availability (e.g. year 1 tuition recordings are available to students in year 2).
- If the presenter is using their webcam, ensure that the environment and background are appropriate.
- Sessions with larger groups of students and teachers, should include a moderator as well as a presenter who can monitor interactions.
- There needs to be a mechanism in place to verify an individual's identity such as an individual or school integral username or a verifiable email address.
- Where an enrichment event is organised for a particular school, the school's online classroom should be used wherever possible and the staff at the school are then responsible for the conduct of the classroom and the necessary safeguards
- Presenters who are streaming into a classroom in a school should ensure that the class teacher is in the room with the students during the session.
- Make sure that students and their teachers understand the rules for using the room.
- If an individual appears in an online room who was not expected or can't be identified, staff should initially verify whether this person has a legitimate reason to be present. If it is established that they should not be present or act inappropriately, there should always be a mechanism for quickly removing such individuals. If it is not possible to do this or they re-enter the room and this can't be prevented, then the session should be terminated.

## Rules for students

- Do not share your password or use any other person's username or password or attempt to attend an online session that you are not invited to attend.
- Follow any guidance given by the online tutor.
- Be polite and responsible when communicating with others.
- Do not record or take pictures during an online session.
- Observe your school or college's cyber safety guidelines to keep safe online.

## Appendix 13

### Changes to this policy

Changes made from version 15.1 (02 Sep 2024) to version 15.1.1 (18 Sep 2024)

- Deleted reference to DBS checks in Appendix 4 and replaced with 'letter of assurance'
- Revised 'Keeping up to date' on page 5 to clarify who needs to read Annex E of KCSIE

Changes made from version 14.2 (19 Jan 2024) to version 15.1 (02 Sep 2024)

- Changed Annex F to Annex E to reflect change of lettering in KCSIE (page 5).
- Added section on adult safeguarding (page 7).
- Added section on school visits and documentation (page 8).
- Included a reference to the guidance for completing risk assessments for online enrichment (page 10).
- Updated Appendix 3 to apply generally to all online tuition (not just FM) and to emphasize the need for all interactions to be monitored (page 13).
- Updated Appendix 5: Safer recruitment policy to include new wording for job adverts (page 17)
- Added section on criminal exploitation to Appendix 10: Recognising abuse (page 33).
- Renumbered pages 9 onwards and deleted older part of this appendix.

Changes made from version 14.1 (15 Aug 2023) to version 14.2 (19 Jan 2024)

- Updated link to the new version of Working together to safeguard children 2023