



Safeguarding & Child Protection Policy

Approved by: NYHA Directors

Last reviewed on: 09/2026

Next review due: 09/2027, or sooner following statutory or operational change

1. Aims

NYHA aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff understand their safeguarding responsibilities and NYHA's reporting procedures
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

NYHA is a non-school alternative provision provider. Keeping Children Safe in Education 2026 is statutory guidance for schools and colleges rather than for NYHA in the same institutional form. NYHA adopts KCSIE 2026, Working Together to Safeguard Children 2026 and the DfE non-school alternative provision voluntary national standards as its safeguarding benchmark, while the commissioning school or local authority retains its own statutory duties. This policy also follows the arrangements published by the local safeguarding partners.

KCSIE 2026 came into force on 1 September 2026 and replaces KCSIE 2025. NYHA will review this policy immediately following any statutory, local-partnership or operational change.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places duties on schools and local authorities; NYHA supports commissioners to discharge those duties through clear information sharing and assurance
- The School Staffing (England) Regulations 2009 and KCSIE safer-recruitment standards, adopted by NYHA as a benchmark for its central record and recruitment controls
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- The Equality Act 2010, which prohibits discrimination because of protected characteristics. NYHA's Directors and Head of Provision must consider equality impact, make reasonable adjustments for disabled learners and take proportionate positive action where evidence shows a group is disadvantaged or at heightened safeguarding risk
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of

harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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

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

Making or sharing nudes and semi-nudes refers to the creation, sending or posting of nude or semi-nude images by a person under 18. It includes photographs, videos and livestreams; images taken by the child or another person; and images digitally altered or wholly generated using artificial intelligence, including deepfakes or deep nudes. Staff must not view, copy, print, forward or ask a child to download such material unless specifically directed by police or the DSL under an approved safeguarding process.

Children includes everyone under the age of 18.

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Family Help and the local Pathway to Provision

NYHA uses the current local threshold framework to identify needs early and secure the right help. In line with Working Together 2026, 'Family Help' includes targeted early help and support for children in need. A request for Family Help must never delay an immediate child-protection referral where significant harm is suspected.

- Universal Services (Tier 1): All children accessing education, healthcare, and family support without additional intervention.
- Family Help: targeted, multi-agency support for children and families with emerging or additional needs. Universal and community-based early help may be appropriate before targeted Family Help.
- Children in Need (Tier 3): Children requiring statutory services under Section 17 of the Children Act 1989.
- Child Protection (Tier 4): Children at risk of significant harm requiring immediate intervention under Section 47 of the Children Act 1989.

Not every safeguarding concern requires child-protection action, but every concern requires a timely response. Staff use professional curiosity, consult the DSL and distinguish Family Help, child-in-need and child-protection pathways without allowing thresholds or uncertainty to delay urgent action.

4. Equality statement

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

We give special consideration to children who:

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

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to every NYHA staff member, agency worker, volunteer, contractor and Director, including people without direct learner contact, and to NYHA activity on site, online and off site. It supports—not replaces—the statutory safeguarding duties of each commissioning body.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will be trained to understand the **Pathway to Provision** and how it relates to child protection. This includes:

- Differentiating between concerns that require Early Help, Child in Need support, or Child Protection.
- Understanding that Pathway to Provision provides a proactive multi-agency approach, ensuring that children receive the right support before statutory intervention is necessary.
- Recognising that child protection is only one part of the safeguarding framework, and Early Help plays a key role in preventing escalation.
- Read and understand KCSIE 2026 Part One in full before 1 September 2026, or before beginning work if later, and review the current Part One at least annually. The DfE Part One overview may support understanding but does not replace the full reading requirement
- Complete a dated read-and-understand declaration for KCSIE Part One, this policy and the Staff Code of Conduct. NYHA will retain the existing declaration or training evidence and follow up any non-completion before staff work with learners
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the online safety policy that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time

- What to look for to identify children who need help or protection

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is Claire Robertson and is part of NYHA's senior leadership arrangements. The DSL leads child protection and wider safeguarding, including online safety and oversight of NYHA's proportionate filtering and monitoring arrangements, their coverage and known limitations across NYHA-connected devices, networks and operating locations.

The DSL is responsible for ensuring that all safeguarding concerns are assessed according to the Pathway to Provision framework and that appropriate referrals are made. This includes:

- Deciding whether a child's needs fall under Early Help, Child in Need, or Child Protection.
- Liaising with Early Help services where concerns do not meet the threshold for statutory social care involvement.
- Collaborating with external agencies and Nottinghamshire's Pathway to Provision safeguarding partners.

During operating hours, the DSL or trained deputy will be available for staff to discuss safeguarding concerns. Staff must record and escalate concerns promptly through CPOMS and must never wait for a named individual where a child may be at immediate risk.

When the DSL is absent, the deputy – Harvey Schofield – will act as cover.

If neither the DSL nor deputy can be contacted, staff must follow the published safeguarding escalation route, contact Children's Social Care/MASH or police directly where required, and record the action on CPOMS. NYHA will maintain a confidential shared safeguarding contact route so urgent information is not dependent on one person's inbox.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction
- Act as a lead practitioner for the local authority

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and harassment with police, Children's Social Care and commissioners so NYHA's procedures and support routes remain current
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputy are set out in their job description.

5.3 Governance oversight

The Directors, supported by independent governance assurance, will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of applicable Human Rights Act and Equality Act duties and NYHA's local multi-agency safeguarding arrangements
- Use Oliver Sillito as the independent governance assurance lead to monitor this policy's effectiveness alongside the Directors. This role is separate from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure NYHA has appropriate filtering and monitoring arrangements and completes a recorded effectiveness review at least annually, led by senior leadership with the DSL and competent internal or external IT support. The review must cover all connected devices, networks and operating locations, risks from generative AI and deepfake content, mobile-device use, identified weaknesses and agreed actions. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the DfE filtering and monitoring standards as a benchmark and agreeing with competent internal or external IT support and service providers the action needed for NYHA's devices, networks and operating locations
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body provides services or activities for NYHA learners:
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with NYHA and the commissioner about safeguarding

- Make safeguarding requirements a condition of using NYHA premises or delivering a commissioned activity, with suspension or termination rights for material non-compliance

A Director or the independent governance assurance lead will act as case manager where an allegation concerns the Head of Provision. Where an allegation concerns a Director, the independent governance assurance lead will manage the response with the LADO.

Directors and the independent governance assurance lead will read the KCSIE sections relevant to their responsibilities and receive safeguarding and online-safety training sufficient to provide effective challenge.

Section 16 explains how Directors and independent governance assurance are supported to fulfil their role.

5.4 The Head of Provision

The Head of Provision is responsible for implementing this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents or carers when a learner joins NYHA and making the current policy accessible
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

You should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 do not prevent or limit proportionate information sharing for the purpose of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a child asks NYHA not to tell anyone about sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into antisocial or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers, contractors and Directors must follow the procedures below whenever a safeguarding concern arises.

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

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

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Our local council:

- May be experiencing extra-familial harm, including stalking, criminal exploitation, financial exploitation, serious youth violence, county lines or radicalisation
- May be experiencing prejudice-based harm, including racism, faith-based prejudice or other discrimination
- May be causing harm to a parent or care giver; child-to-parent or care-giver abuse is a safeguarding concern for the child and affected family members

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

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

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

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

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

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

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

- If a concern indicates a need for support before statutory intervention, the DSL will distinguish universal or community-based early help from targeted Family Help and use the current local Pathway to Provision.
- If a concern meets the threshold for **Tier 3 (Child in Need)**, the DSL will liaise with local authority social care.
- If a child is at risk of **significant harm (Tier 4, Child Protection)**, a referral will be made to social care immediately.

The **Pathway to Provision** ensures that concerns are addressed at the earliest opportunity, reducing the likelihood of escalation into child protection proceedings.

Family Help and early-help assessment

If a Family Help or early-help assessment is appropriate, the DSL will:

- Liaise with other agencies and set up an **inter-agency assessment**.
- Monitor the case and **consider escalation to statutory social care if the situation does not improve**.
- Ensure all referrals follow the **Pathway to Provision framework** to access appropriate support.

Referral

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

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

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

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

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and

supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

7.6 If you have a concern about mental health

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

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

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

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

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

7.7 Concerns about a staff member, trainee teacher, supply teacher, volunteer or contractor

If a concern or allegation involves a staff member, trainee teacher, agency worker, volunteer or contractor, report it immediately to the Head of Provision and DSL unless either is implicated. A concern about the Head of Provision must go to a Director or the independent governance assurance lead; a concern about a Director must go to the independent governance assurance lead and LADO.

The case manager will follow appendix 3 and seek LADO advice without conducting an investigation that could compromise the external process.

Independent schools where the headteacher is the sole proprietor, use:

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. The headteacher will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the headteacher, speak to the local authority designated officer (LADO).

7.8 Child-on-child abuse, sexual violence and sexual harassment

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

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

Lower-level behaviour between learners may be addressed under the Behaviour Policy, but this safeguarding policy applies whenever an allegation raises a safeguarding concern. Child-on-child

abuse is preventable and is never dismissed as banter or an inevitable part of growing up. This includes where the alleged behaviour:

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

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing nudes and semi-nudes

Your responsibilities when responding to an incident

If you are made aware of any incident involving the making or sharing of nude or semi-nude images or videos, whether consensual or non-consensual and including AI-generated or altered imagery, you must report it to the DSL immediately. Every such incident requires a safeguarding response and a recorded decision; staff must not treat it as a routine behaviour matter.

You must **not**:

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

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's

social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through a police community support officer, local neighbourhood police, dialling 101.

Recording incidents

All incidents involving the making or sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply.

Curriculum coverage

Learners are taught about the issues surrounding the making and sharing of nudes and semi-nudes through age-appropriate personal development and online-safety education. Teaching covers:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

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

Age-appropriate information is shared with learners so they understand NYHA's response to nude, semi-nude, deepfake or synthetic sexual imagery incidents.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

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

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Maintain proportionate filtering and monitoring arrangements to support the online safety of learners, staff, volunteers, contractors and Directors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make learners, parents or carers, staff, volunteers and Directors aware of the applicable acceptable-use agreement for NYHA internet access, ICT systems, mobile devices and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Use proportionate filtering and monitoring arrangements, combining directly supervised learner access with any technical filtering or network/domain logging that has been configured and successfully tested, to limit exposure to the four key online-risk categories across NYHA-connected systems and devices. Technical controls are an additional layer and are not treated as capable of identifying every webpage, search, application, encrypted service, VPN, personal hotspot or mobile-data session.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises NYHA's approach to online safety and mobile phones. The Online Safety, Acceptable Use and Mobile Phone policies contain the detailed controls.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative AI tools such as ChatGPT and Google Gemini.

New You Hair Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

New You Hair Academy will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff must not introduce or use an AI tool with learner or personal data until NYHA has completed safeguarding, accuracy, privacy, security and bias checks and authorised the use.

8.2 Physical activity, sport and practical learning

NYHA plans PE, active enrichment, salon activity, trips and commissioned sport so that supervision, equipment, the environment, medical and SEND needs, changing arrangements, privacy and the individual learner's needs are considered. Where strength, stamina or physique creates a material safety or fairness issue, participation arrangements are considered in line with current Equality Act guidance. Other requests are considered individually and sensitively, with safety, dignity, privacy and non-discrimination central. Any safeguarding concern arising from an activity is reported immediately to the DSL and recorded through the approved safeguarding route.

8.3 Premises, toilets, changing and privacy

NYHA applies the legal premises requirements relevant to its status and uses KCSIE 2026 as its safeguarding benchmark. Facilities and activity arrangements must protect safety, comfort, privacy and dignity. Individual adjustments are reviewed by leadership and the DSL using current law, evidence and the learner's needs. Premises hazards and evidence requirements are controlled through the Premises Compliance Register; immediate hazards are acted on, and internal checks are not treated as a substitute for competent professional certification or landlord evidence.

9. Notifying parents or carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the

other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

9.1 Management of Pupils Who Become Unwell During the School Day

If a learner becomes unwell during an NYHA session and cannot safely remain, a parent, carer or authorised adult will normally be required to collect them from NYHA.

Pupils will remain supervised by staff until they are collected.

This procedure forms part of NYHA's safeguarding and duty of care. Staff are not medically qualified to predict whether a learner's condition may deteriorate while travelling home independently.

In exceptional circumstances where collection is not possible, the Head of Provision, DSL or Deputy DSL will undertake a risk assessment and determine the safest and most appropriate arrangement. This may include:

- Another authorised adult collecting the pupil;
- The pupil remaining in school until they are fit to return to lessons or until collection becomes possible;
- A parent arranging and authorising transport;
- In limited cases, authorising independent travel where the pupil is judged well enough and it is considered safe to do so.

The rationale for any alternative arrangements will be recorded where appropriate.

This procedure applies to all pupils, including those aged 16 and over.

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

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

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

Working closely with student support

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy).

11. Pupils with a social worker

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

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

The DSL will work with the commissioning school's designated teacher, the child's social worker and the relevant Virtual School Head. NYHA supports the pupil's educational achievement but does not replace the commissioning school's statutory designated-teacher responsibilities.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Complaints and concerns about safeguarding practice

14.1 Complaints against staff

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

14.2 Other complaints

New You Hair Academy treats complaints seriously and aims to resolve issues in the quickest, safest and fairest way possible.

14.3 Whistle-blowing

Staff must raise concerns about unsafe, unlawful or poor safeguarding practice immediately. They may report to the DSL, Head of Provision, a Director or the independent governance assurance lead, according to who is implicated.

A concern about senior leadership, or a concern which cannot safely be raised internally, may be reported directly to the Nottingham City LADO, Children's Social Care/MASH, police, the Disclosure and Barring Service or another appropriate prescribed body. Staff acting in good faith will be protected from victimisation under NYHA's Whistleblowing Policy.

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

CPOMS is NYHA's authoritative safeguarding record for learner concerns, referrals, decisions and rationale. Access is role-based and audited. Staff must not create separate shadow safeguarding files.

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

NYHA will retain safeguarding records for the period set out in its retention schedule and commissioning arrangements, taking account of the child's age, risk and any legal hold.

The commissioning school normally retains the principal child-protection file. NYHA will provide it with a secure, structured safeguarding summary and relevant records without delay when a placement ends or the learner moves, and will obtain confirmation of receipt.

Information must be shared early enough for the commissioner or receiving setting to put support in place, normally within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- We keep paper-based or electronic records
- In CPOMS and approved secure systems in line with access controls, retention requirements and the Data Protection Policy

In addition:

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

16. Training

16.1 All Staff

Every staff member, including staff without direct learner contact, must read KCSIE 2026 Part One in full and complete the recorded declaration before 1 September 2026 or before starting work if later. Safeguarding training, including online safety and filtering and monitoring responsibilities, is provided at induction, updated regularly and refreshed at least annually.

All staff will receive **annual training on the Pathway to Provision**, ensuring they:

- Understand the **four tiers of intervention**.
- Can identify whether a concern requires **Early Help or a statutory referral**.
- Know the current local referral route and NYHA's role within Nottingham's threshold and Family Help arrangements.

16.2 The DSL and Deputy

The DSL and deputy will ensure that staff training incorporates:

- **The difference between safeguarding and child protection.**
- **When and how to refer to Early Help, Child in Need, and Child Protection.**
- **Collaboration with multi-agency partners within the Pathway to Provision framework.**

16.3 Directors and independent governance assurance

Directors and the independent governance assurance lead receive safeguarding and child-protection training, including online safety, at induction and at regular intervals. This ensures that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can test whether safeguarding policies and procedures are effective and support a robust whole-provision approach

Anyone who may act as case manager for an allegation concerning the Head of Provision or a Director will receive appropriate allegations-management training.

16.4 Recruitment – interview panels

At least one person conducting each recruitment interview will have completed current safer-recruitment training covering KCSIE 2026 and local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

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

17. Monitoring arrangements

This policy will be reviewed at least annually by Claire Robertson, DSL, with Harvey Schofield, Head of Provision, and approved by the Directors with independent governance assurance. It will also be reviewed immediately following a relevant statutory, local or operational change.

Important Contacts

LADO - Local Authority Designated Officer

Nottingham City LADO – use the current online referral form; email LADO@nottinghamcity.gov.uk; telephone 0115 876 5166

Current LADO referral route: <https://www.nottinghamcity.gov.uk/lado>

MASH - Multi Agency Safeguarding Hub

Nottingham City MASH online referral form

MASH telephone – 0115 876 4800; email CityMASH@nottinghamcity.gov.uk

MARF - Multi Agency Referral Form

We would be required to fill out a MARF after the call (Multi Agency Referral Form)

18. List of updates following revisions to KCSIE

KCSIE 2026 is effective from 1 September 2026. The principal implementation changes for NYHA are:

All staff read Part One in full; the condensed Annex A route has been removed.

Family Help terminology replaces older early-help wording while urgent child-protection thresholds remain unchanged.

Child-on-child abuse content is strengthened, including prevention, threats, weapons, sexual violence and harassment, and support for both the child harmed and the alleged perpetrator.

Online safety includes generative AI, deepfakes, synthetic sexual imagery and mobile-device risk.

A recorded annual review of filtering and monitoring effectiveness covers every NYHA-connected device, network and operating location.

DSL cover, information sharing, alternative provision assurance, mental health, young carers, medical conditions and safer recruitment controls are strengthened.

The supervision exemption for volunteers undertaking regulated activity is removed; the Safer Recruitment and Volunteer policies contain the detailed control.

- The terminology and response for making or sharing nudes and semi-nudes now explicitly covers AI-generated and altered imagery; every incident receives a safeguarding response.
- Safeguarding examples now explicitly include modern slavery, stalking, financial exploitation, child-to-parent or care-giver abuse and prejudice-based harm.

- Physical activity and sport, premises, toilets, changing, privacy and dignity are considered through safeguarding and proportionate risk assessment.
- Staff-allegation controls explicitly include trainee teachers, and information-sharing practice reflects the Data (Use and Access) Act 2025.

Appendix 1 – Categories and Definitions of Abuse

Abuse is a deliberate act of harm or neglect that results in, or is likely to result in, significant harm to a child. It may occur within a family, in an institutional or community setting, online, or through exposure to harmful individuals. It can involve inflicting harm directly or failing to act to prevent harm.

Physical abuse involves causing physical harm to a child through actions such as hitting, shaking, burning, poisoning, drowning, or suffocating. It may also include fabricating the symptoms of illness or deliberately inducing illness.

Emotional abuse is the persistent emotional maltreatment of a child that adversely affects their emotional development. This can involve conveying to a child that they are worthless, unloved, or inadequate; isolating them from normal social interaction; imposing inappropriate expectations; or exposing them to ongoing domestic abuse. Emotional abuse is present in all other categories of abuse, though it may occur independently.

Sexual abuse includes forcing or enticing a child to take part in sexual activities, whether or not they are aware of what is happening. This may involve physical contact or non-contact activities such as encouraging a child to view sexual images or videos, being present during sexual acts, or communicating sexually online. Sexual abuse may be perpetrated by adults or by other children (see section 7.8 on child-on-child abuse).

Neglect is the persistent failure to meet a child's basic physical and emotional needs, leading to significant impairment of their health or development. It includes failing to provide adequate food, clothing, or shelter; failing to protect from harm or danger; inadequate supervision; and failing to ensure access to healthcare or education.

Extra-familial harm may occur beyond the home and includes criminal or sexual exploitation, modern slavery, stalking, serious youth violence, financial exploitation and radicalisation.

Child-to-parent or care-giver abuse and prejudice-based harm are also safeguarding concerns. Staff act on indicators and report them to the DSL; they do not wait for a child to use a particular label.

These categories are not mutually exclusive. Children experiencing one form of abuse may also be subjected to others. Safeguarding staff must be alert to the broader context and cumulative impact of abuse on a child's wellbeing.

Appendix 2 – Safer Recruitment and Pre-Appointment Vetting

New You Hair Academy follows rigorous safer recruitment procedures to ensure that all individuals working with children are suitable to do so. These procedures apply to all permanent and temporary staff, volunteers, and contractors who will work directly or indirectly with children.

Prior to any appointment, the following checks are undertaken:

- Verification of identity and right to work in the UK
- Enhanced Disclosure and Barring Service (DBS) check with children's barred list information for all staff engaged in regulated activity
- Professional qualifications (where required)
- A minimum of two verified references, including one from the most recent employer
- Full employment history, with explanation of any gaps
- Online searches in line with updated DfE guidance to identify any potential safeguarding or reputational risks
- Overseas police checks (where applicable)
- Prohibition from teaching check for teaching roles

A central recruitment record is maintained and regularly reviewed by the Head of Provision with safeguarding oversight from the DSL. It records the checks required for staff, agency workers, contractors and volunteers.

In addition, all recruitment panel members receive training in safer recruitment, and at least one trained member is present at every interview panel.

Before working with learners, all new staff receive safeguarding induction and must read and sign KCSIE 2026 Part One in full, this policy and the Staff Code of Conduct.

Appendix 3 – Managing Allegations Against Staff and Volunteers

NYHA places children's welfare first and handles every allegation about a staff member, trainee teacher, agency worker, volunteer or contractor seriously under KCSIE 2026 as its benchmark and current LADO procedures.

Where an allegation is made that someone working with children has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates they may pose a risk of harm to children
- Behaved in a way that raises concerns about their suitability to work with children

The DSL must be informed immediately unless implicated. If the allegation concerns the Head of Provision, a Director or the independent governance assurance lead must be informed without delay; if a Director is implicated, the independent governance assurance lead will act. The Nottingham City LADO will be contacted within one working day, and sooner where immediate safeguarding action is required. NYHA will not conduct a fact-finding investigation that could compromise the LADO or police process.

The Academy will take all necessary steps to ensure the immediate safety of any child involved. The staff member may be suspended pending investigation if this is deemed necessary to protect children or the integrity of the process. All decisions will be made in consultation with the LADO.

Low-level concerns that do not meet the harm threshold will be logged confidentially and reviewed by the Head of Provision and DSL under the Low-Level Concerns Policy.

Where an allegation is substantiated and the individual is dismissed (or would have been had they not resigned), the Academy will refer the case to the Disclosure and Barring Service (DBS) and any relevant regulatory body.

All outcomes and actions taken will be recorded securely, and the member of staff informed of the conclusion in writing.

Appendix 4 – Recognising Key Indicators and Emerging Safeguarding Risks

All staff must be alert to the signs and symptoms that may indicate abuse, neglect, or exploitation. Prompt recognition and reporting can prevent escalation and safeguard a child's wellbeing.

General warning signs may include:

- Unexplained injuries or reluctance to explain them
- Regressive or withdrawn behaviour
- Poor hygiene or malnutrition
- Over-familiarity with adults or inappropriate sexual knowledge
- Decline in school attendance or engagement
- Self-harming or suicidal thoughts

Specific indicators of risk include:

- **Child Criminal Exploitation (CCE):** Children involved in county lines, carrying weapons, or associating with gangs. May possess unexplained money, phones, or be found in areas far from home.
- **Child Sexual Exploitation (CSE):** Relationships with older individuals, receipt of gifts, withdrawal from family or school, or sexualised behaviour.
- **Radicalisation:** Expressing extremist views, increased isolation, or sudden interest in ideology that supports violence.
- **Female Genital Mutilation (FGM):** Talking about a special ceremony, planning travel abroad, or older female relatives playing a role in family decision-making. FGM is illegal and must be reported to the police by any teacher who discovers it has occurred.
- **Child-on-Child Abuse:** Includes sexual violence, harassment, initiation-type behaviours, online abuse, and coercive control by other children.
- **Mental Health concerns:** Staff should be vigilant for signs of depression, anxiety, eating disorders, substance misuse, or behavioural changes which may indicate underlying abuse or trauma.

It is vital to understand that **safeguarding is not solely about identifying abuse**, but about recognising vulnerability, responding with professional curiosity, and taking proactive steps to ensure each child's safety and well-being.

Staff must record and report any concern — no matter how small — to the DSL without delay, maintaining a clear record of concerns, actions taken, and rationale for decisions.