



Safeguarding and Child Protection Policy

Effective Date: February 2026

Review Date: February 2027

Person Responsible for reviewing this policy: Lindsey Townsend

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Part 1: Policy

Definitions

Safeguarding is defined as:

- Protecting children from maltreatment inside 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
- Providing help and support to meet the needs of children as soon as problems emerge

Child Protection is defined in the Children Act 1989 (s.47) as when a child is suffering or is likely to suffer significant harm. Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

Introduction

At Network Learning Pathways

- Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children, their families and carers, has a role to play.
- In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should always consider what is in the **best interests** of the child.
- We take an '**it can happen here**' approach where safeguarding is concerned.
- **Everyone** who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action.
- Victims of harm should **never** be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Network Learning Pathways is committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children and young people can learn.
- Acting on concerns about a child's welfare immediately.
- Fulfilling our legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm.
- Being on alert to the need for early help for a child who is frequently missing/goes missing from education, home or care; has experienced multiple suspensions; is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit; has a parent or carer in custody or is affected by parental offending.

All action taken by Network Learning Pathways will be in accordance with:

- **Current legislation** Children Act 1989 and 2004; Education Act 2002 and 2011 and Education and Inspection Act 2006
- **Statutory guidance – this includes:**
 - **Working Together to Safeguard Children (2018)**, which sets out the multiagency working arrangements to safeguard and promote the welfare of

children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.

- **Keeping Children Safe in Education (2025)** is statutory guidance issued by the Department for Education which all schools and colleges and alternative provisions must adhere to. The updated guidance provides additional information to clarify and reflect existing alternative provision guidance, highlighting how schools must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- **Guidance for Safer Working Practice (2022)** this outlines the behaviours expected by professionals working in the children's workforce
- **Local Guidance from the Local Safeguarding Partnership:** Information on arrangements can be found on the North Somerset Safeguarding Children Partnership website.

Equalities Statement

With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include:

1. Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
2. Advance equality of opportunity and good relations between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under Network Learning Pathways' Equality & Diversity Policy which can be found in our office.

Staff are aware of the additional barriers to recognising abuse, neglect and exploitation in children with Special Educational Needs and Disabilities (SEND).

Network Learning Pathways also adheres to the principals of and promotes anti-oppressive practice in line of the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

Overall Aims

This policy will contribute to the safeguarding of children at Network Learning Pathways by:

- Clarifying safeguarding expectations for all members of its community, staff, learners, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the alternative provision built on shared values; that learners are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the alternative provision can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the alternative provision community (staff, learners, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with learners, parents, and other agencies in the Local Safeguarding Partnership.

Professional Expectations, Roles, and Responsibilities

Role of All Staff

- All staff will be familiar with this policy
- All staff will read and understand Part 1 of statutory guidance Keeping Children Safe in Education (2025). Those working directly with children will also read Annex B. Those who do not work directly with children will have the option of reading Annex A instead
- Staff will be aware of their responsibilities under the Prevent Duty and their role in preventative education with a culture of zero tolerance for sexism, misogyny, misandry, homophobia, biphobia and sexual violence/ harassment
- All staff will know who and how to contact the DSL and any deputies, and the Operations Director.
- All staff will be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
 - who may be experiencing abuse, neglect and exploitation
 - requiring mental health support
 - may benefit from early help through Family Wellbeing Services
 - where there is a radicalisation concern
 - where a child may be experiencing child-on-child abuse
 - where there are concerns due to online risk
 - where a crime may have been committed
- All staff will be clear as to Network Learning Pathways policies and procedures about child-on-child abuse, online safety, children missing education and those requiring mental health support
- Staff will be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- Record concerns appropriately and in a timely manner by using the setting's safeguarding systems. Safeguarding records are held confidentially on our LearnTrek system.
- Staff will be aware of the need to raise to the Operations Director any concerns they have about safeguarding practices within the provision.

Role of the Designated Safeguarding Lead (DSL)

Our DSL is Rachel Westwood

Rachel.westwood@networklp.co.uk

Mobile: 07917170654

The DSL is a senior member of staff who undertakes lead responsibility for safeguarding and child protection within our provision.

DSL Main Duties

- Keeping records of concerns, discussions and decisions as well as keeping records of the rationale for any decisions made.
- Maintaining continual communication with commissioners around safeguarding. Sharing policies, processes and communication links with commissioners at the point of referral.
- Ensuring no pupil starts a placement without consideration of their safeguarding records.

- Keeping commissioners informed of any safeguarding concerns.
- Ensuring safeguarding records are passed on promptly at the end of a placement
- Manage allegations of abuse against people who work with children by liaising with the Local Authority and Local Authority Designated Officer (LADO) in accordance with statutory guidance
- Weekly review safeguarding records (stored on LearnTrek) to ensure the actions are complete.
- Termly review safeguarding records to check on trends that need response.
- Termly reviewing the quality of recording by staff. These reviews lead to changes in staff training, curriculum or policies where appropriate to address any issues.
- Act as a source of support, advice and expertise for all staff on matters of safety, safeguarding and welfare (including online safety) so that children's needs are considered holistically
- Act as a point of contact for all regarding safeguarding and child protection matters
- Coordinate safeguarding training for all staff including maintaining and implementing a training plan and keeping records
- Help promote educational outcomes by sharing information about vulnerable learners with relevant staff
- Promote supportive engagement with parents and/or carers on matters of safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Refer children and families who have been identified in need of family wellbeing services to Children's Social Care through the Front Door (with consideration to consent)

Role of the Head of Service and Operations Director

Our Head of Service is Rachel Westwood

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Our Operations Director is Lindsey Townsend

Lindsey.Townsend@networkhsc.co.uk

Mobile: 07912476601

The Head of Service and Operations Director, who is a member of the Board of Directors, take responsibility for the setting's safeguarding responsibility to ensure that safeguarding and child protection practice, process, and policy (including online safety) is effective, is understood by all, and is compliant with legislation, statutory guidance, and Local Safeguarding Partnership arrangements.

- Ensure effective measures are in place for safer recruitment.
- Ensure that the DSL is an appropriate senior member of the provision's senior leadership team and ensure that they have adequate time, funding, training, resources, and support to carry out their role effectively
- Ensure that the training and learning for the alternative provision is robust and effective
- Ensure that learners are taught about safeguarding on the curriculum including [online safety](#) and [Relationships and Sex Education](#) in compliance with statutory guidance
- To ensure that teachers, including supply teachers, other staff, volunteers, and contractors have appropriate checks carried out in line with statutory guidance Keeping Children Safe in Education (2025, Part 3)

- Ensure that there are procedures in place to ensure safeguarding concerns are reported as required by the LA as well as allegations against teachers, other staff, volunteers, and contractors who may not be suitable to work with or pose a risk to learners through LADO
- Ensure that systems are in place for learners to effectively share a concern about a safeguarding issue they are experiencing, express their views and give feedback
- Ensure that the setting has systems in place to prevent, identify and respond to child-on-child harm (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices

Safeguarding Training for Staff

All staff:

- All staff members will undergo safeguarding and child protection (including online safety) training at induction
- All staff will receive appropriate safeguarding and child protection (including online safety) refresher training at least annually (via formal training, emails, and staff meetings)
- All staff must understand their legal duty under the Mandatory FGM Reporting Duty
- All staff must complete Prevent awareness training. This is to ensure that they can comply with the legal expectations under the Prevent Duty
- Staff training must include clear reference to internal whistleblowing policy and guidance for escalating concerns
- All staff must have the awareness of child-on-child abuse and understand their responsibility to challenge it and not pass it off as 'banter'

Designated Safeguarding Lead:

- DSLs will undergo formal training provided by the local authorities within which Network Learning Pathways is operating to provide them with the knowledge and skills (including online safety) required to carry out the role. The training will be updated every two years.
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- The DSL will liaise with the Local Authority to ensure that their knowledge and skills are updated via e-bulletins, attend DSL network meetings, and take time to read and digest safeguarding bulletins

Safer Recruitment and Safer Working Practice

Safer Recruitment

Network Learning Pathways pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (2024; Part 3)

- This includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. References are always obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed
- It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity
- Informal checks are also completed on applicants' online presence in addition to formal checks

- All recruitment materials will include reference to Network Learning Pathways' commitment to safeguarding and promoting the wellbeing of learners

Whistleblowing Policy

Staff are aware that any concerns around staff and volunteers should be addressed with the Head of Service. Staff are also aware of the details of the LADO should they feel that they cannot raise concerns internally.

Further guidance can be found at:

- [North Somerset Allegations Against Staff or Volunteers guidance](#)
- Advice on whistleblowing <https://www.gov.uk/whistleblowing>.
- The NSPCC whistleblowing helpline is available [here](#) for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Parents and carers should contact the Head of Service if they have any concerns in the first instance. Network Learning Pathways' whistleblowing and complaints procedures can be found within the provision.

Part 2: Procedures

Whistleblowing Procedure- Responding to Concerns

Staff must report any concerns or allegations about a professional's behaviour (including supply staff, volunteers, and contractors) where they may have:

- 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 or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Immediate action must be taken

- Do not speak to the individual it concerns
- Allegations or concerns about colleagues and visitors must be reported directly to the Head of Service who will follow guidance in Keeping Children Safe in Education 2024, Part Four: Allegations made against/ Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors
- If the concern relates to the Head of Service, it should be reported directed to the Local Authority Designated Officer (LADO) and they will decide on any action required
- Allegations regarding foster carers or anyone in a position of trust working or volunteering with children should be referred to the LADO on the day that the allegation is reported. The allocated social worker should also be informed on the day. The school should not undertake any investigation unless the LADO advises this

Low level concerns

This should be read in conjunction with the staff code of conduct and Keeping Children Safe in Education (2024, Part 4). A low-level concern is not 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 in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils.

This process should be used in events where a concern about professional conduct does not meet the threshold set out at the beginning of this section.

- Reports should be made to the Head of Service
- The Head of Service will address unprofessional behaviour and support the individual to correct it at an early stage providing a responsive, sensitive, and proportionate handling of such concerns when they are raised
- All concerns will be recorded in writing, including the context and actions taken and reviewed to monitor for any patterns
- Review and correct any deficits in the setting's safeguarding system

Information Sharing

Network Learning Pathways is committed to have due regard to relevant data protection principles which allow for sharing (and withholding) personal information as provided for in the Data protection Act 2018 and UK General Data Protection Regulations. This includes how to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.

Staff at this setting are aware that:

- 'Safeguarding' and 'individuals at risk' is a processing condition that allows practitioners to share special category personal data.
- Practitioners will seek consent to share data where possible in line with [Information Sharing for Safeguarding Practitioners 2018](#).

There may be times when it is necessary to share information without consent such as:

- To gain consent would place the child at risk,
- By doing so will compromise a criminal investigation,
- It cannot be reasonably expected that a practitioner gains consent, or
- if by sharing information it will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent.

There are also times when it will not provide pupil's personal data where the serious harm test under legislation is met, (by sharing the information the child may be at further risk).

When in doubt Network Learning Pathways will seek legal advice.

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

Multi-Agency Working

Network Learning Pathways is a relevant agency in the North Somerset Safeguarding Children Partnership and will work with appropriate agencies to safeguard and promote the welfare of

children to identify and respond to their needs. This is in compliance with statutory guidance [Working Together to Safeguard Children 2018](#).

Occasions that warrant a statutory assessment under the Children Act 1989:

- If the child is in need under s.17 of the Children Act 1989 (including when a child is a young carer and or subject to a private fostering arrangement).
- Or if the child needs protection under s.47 of the Children Act 1989 where they are experiencing significant harm, or likely to experience significant harm.

Referrals in these cases should be made by the DSL to Children's Social Care in the Local Authority in which that child resides.

Where the child already has a social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager. If the child is a child in care, notification should also be made to the Virtual School.

Network Learning Pathways will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes ensuring representation at appropriate inter-agency meetings such as Multi-Agency Safeguarding Hub (MASH), Family Meetings, initial and review child protection conferences and core group meetings.

Additional considerations

- Where a learner and/or their family is subject to a child protection plan or a Multi-Agency Risk Assessment Conference (MARAC) meeting, the setting will contribute to the preparation, implementation, and review of the plan as appropriate.
- In situations where a child in care may be put on to part time timetable, the school will consult with the Virtual School following local procedures.
- **If there is a risk of harm, the police should be called via 999. For other concerns of criminality, Avon and Somerset Police have produced a helpful guide [When to Contact the Police](#)**
- **In the rare event that a child death occurs, or a child is seriously harmed, Network Learning Pathways will notify the North Somerset Safeguarding Children Partnership as soon as is reasonably possible**

Identifying and Monitoring the Needs of Vulnerable Learners

The DSL will regularly review and monitor those students who have been identified as vulnerable. This can include reviewing attendance data, behaviour data, attainment data and safeguarding records. This is to ensure that:

- Proportionate and early interventions can be taken to promote the safety and welfare of the child and prevent escalation of harm
- Information about vulnerable learners is shared with teachers and school and college leadership staff to promote educational outcomes
- Learners who currently have, or have had, a social worker will have their academic progress and attainment reviewed and additional academic support will be provided to help them reach their full potential
- Reasonable adjustments are made in relation to provision-based interventions, for example responding to behaviour

Children Missing From Education

A learner who is frequently missing or goes missing from education, home or care is a potential indicator of abuse, neglect or exploitation, or maybe an indicator of need for early help support. Staff should follow procedures for unauthorised absence and for dealing with children that go

missing from education, particularly on repeat occasions (as detailed in our Attendance Policy).

Network Learning Pathways will follow the DfE's Children Missing Education: statutory guidance for local authorities and schools (Updated September 2025). The DSL or deputy will inform the local authority where the child lives if any pupil fails to attend the provision regularly.

This guidance should be read alongside the statutory guidance documents on:

- [Working together to improve school attendance](#)
- [Supporting pupils at school with medical conditions](#)
- [Suspension and permanent exclusions](#)
- [Alternative provision](#)
- [Elective home education](#)
- [Keeping children safe in education](#)

[Responding to Incidents of Child-on-Child Harm](#)

All staff recognise that children can abuse or exploit other children (including online). Incidents of abuse and harm should be dealt with in reference to the safeguarding and behaviour policies.

Examples of Child-on-Child harm can be found under the child-on-child abuse section in Annex A of this policy

At Network Learning Pathways

- We have a 'zero tolerance' approach to abuse. Incidents are taken seriously. These will never be tolerated or passed off as 'banter,' just having a laugh' or 'part of growing up.' Banter and teasing can and should be acknowledged and recognised as bullying behaviour and may require proportionate intervention
- Even with a zero-tolerance approach, we take steps to educate and take action to mitigate the risk of contributing to a culture of unacceptable behaviours or a culture that normalises abuse
- It is understood that child-on-child harm may reflect equality issues, those who may be targeted are more likely to have protected characteristics such as race, religion, gender, gender identity, SEND needs or sexuality.

There are clear systems in place (which are well promoted, easily understood and easily accessible) for learners to confidently report abuse. Our provision has taken steps to ensure students know their concerns will be dealt with by trusted tutors and mentors, learner forums and learner voice.

Network Learning Pathways will handle initial reports of harm by:

- Ensuring the immediate safety of learners involved in an incident and sourcing support for other young people affected
- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions using the Tell, Explain, Describe (TED) method
- Ensuring that victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. They will never be made to feel ashamed for making a report

- Ensuring the child's wishes are taken into consideration in any intervention and any action is taken to ensure safety of the target and other members of the wider peer cohort
- Not promising confidentiality as it is highly likely that information will need to be shared with others

Actions to take in relation to Sexual Violence and Sexual Harassment

Reference to [Keeping Children Safe In Education \(2024\)](#) will be made in relation to taking protective action for student who have experienced sexual violence or harassment.

Network Learning Pathways will take the following actions:

- Incidents will be reported immediately to the DSL/ Deputy DSL who will undertake further assessment to determine a proportionate response to the factors that have been identified
- When an incident involves an act of **sexual violence** (rape, assault by penetration, or sexual assault), the police should be informed, this is likely to be in parallel with Children's Social Care
- For other disclosures the age and wishes of the victim should be taken into consideration. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- The DSL or Deputy (where trained) may utilise [The Brook - Sexual Behaviours Traffic Light Assessment Tool](#) where Inappropriate or Harmful Sexual Behaviour is identified. This toolkit may support a referral to Children's Social Care where required
- Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted)
- Where the report includes an online element, the setting will follow [Searching, screening and confiscation at school - GOV.UK \(www.gov.uk\)](#) and [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#). **The key consideration is for staff not to view or forward illegal images of a child.**
- Risk assessments and or safety plans will be considered for individual children who have been involved in an incident. This should be reviewed every 3 months or every time there is an occurrence of an incident. These should involve the child and parents/carers and address contextual risks.

Contextual Safeguarding Approach to Child-on-Child Harm

Network Learning Pathways will minimise the risk of child-on-child abuse or exploitation by taking a contextual approach to safeguarding, working to increase safety in the contexts in which harm can occur – this can include the school environment itself, peer groups, the online world, local neighbourhood contexts and wider society influences.

Following any incidents of child-on-child harm, the DSL/Deputy will review and consider whether any practice or environmental changes can be made in relation to any lessons learned. This can include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics in the curriculum, utilising pupil voice and engaging external services and multi-agency partners.

Mental Health and Wellbeing

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their learners. 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, and or may require early intervention.

Network Learning Pathways will commit to the following.

- Providing mental health practitioners who can support the development of knowledge and act as a point of expertise to promote the wellbeing and mental health of learners. These colleagues will have sufficient training in mental health and safeguarding for them to carry out their role effectively
- Ensure that learners can report and share concerns, and that taboos around discussions of mental wellbeing are tackled
- Staff will follow a safeguarding process in terms of reporting concerns so the DSL/Deputy DSLs can assess whether there are any other vulnerabilities identified and proportionate support considered
- Staff will ensure the immediate health and safety of a learner who is displaying acute mental health distress. This may require support from emergency services via 999 if the learner is at risk of immediate harm
- DSLs/Deputies will consider whether a case can be managed internally, through early help, or should involve other agencies such as GP, CAMHS, Kooth, Off the Record
- Communicate and work with the learner and parents/carers to ensure that interventions are in the best interests of the child
- DSLs will liaise with staff to ensure reasonable adjustments are made and develop ways to support positive educational outcomes
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, this is not the responsibility of our provision– DSLs and the senior leadership team will be able to access specialist advice through targeted services or through their locality. The [North Somerset Emotional Health for Children and Young People](#) guide highlights services in our area
- Deliver high quality teaching around mental health and wellbeing
- Have a culture and environment that promotes mental health and wellbeing
- Make sure pupils and staff are aware of and able to access a range of mental health services
- Support staff wellbeing
- Being committed to hearing the voices of parents and pupils with relation to mental wellbeing

Online Safety

Online safety is an integrated and interwoven theme with other safeguarding considerations. It is essential that the DSL takes a lead on ensuring that interventions are effective. This means coordinating support and engaging with other colleagues in the setting who may have more technological expertise.

Key areas of online safety our provision considers are:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, disinformation, misinformation and conspiracy theories. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content (Cabinet Office, Department for Science, Innovation and Technology, 2023).
- **Contact:** being subjected to harmful online interaction with other users; for example: 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:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying,
- **Generative Artificial Intelligence:** KCSIE 2025 includes a link to the DfE guidance Generative AI: product safety expectations. This guidance on generative (AI) explains how filtering and monitoring requirements apply to the use of generative AI in education and supports schools to use generative AI safely.

Network Learning Pathways is committed to addressing online safety issues around content, contact and conduct. This includes:

- Ensuring that online safety is included in relevant policies and procedures
- Online safety is interwoven in safeguarding training for staff and safeguarding on the curriculum for learners
- Acknowledging that child-on-child abuse can happen via mobile and smart technology between individuals and groups
- Ensuring the effectiveness of filtering and monitoring to protect learners in our provision. Information security, filtering, monitoring and access management will be reviewed annually

Network Learning Pathways' policy on the use of mobile smart technology is available within the Staff and Learner Codes of Conduct.

Annex A- Types of Abuse

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to when children see, hear or experience domestic abuse and its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. For children with Special Educational Needs and Disabilities (SEND) additional barriers can exist when identifying abuse, neglect and exploitation, these include:

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

To address these additional challenges, schools and colleges should consider extra pastoral support for children with SEND (KCSIE 2024).

The following are the definition of abuse and neglect as set out in Working Together to Safeguard Children (2018) however, the ultimate responsibility to assess and define the type of abuse a child or young person may be subject to is that of the Police and Children's Services – our responsibility is to understand what each category of abuse is and how this can impact

on the welfare and development of our children. Where we have concerns that a child or young person may be at risk of abuse or neglect (one or more categories can apply) to take appropriate action as early as possible.

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

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening or not. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate caregivers), ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child Sexual Exploitation (CSE) and Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity.

The abuse may be perpetrated by an individual or groups, males or females, adults or children. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and can be facilitated in-person or wholly online.

Gangs and youth violence

Teachers and designated staff have a range of powers to discipline and tackle problems, including violence, in the school environment. Such powers include the power to restrain violent pupils, and the power to search pupils for prohibited items.

Serious Violence

All staff should be aware of the signs that indicate a child is at risk of, or involved with serious violence, this includes absence from our provision, changes of friendship group, unexplained injuries, self-harm, unexplained gifts or possessions. Staff should also be aware of relevant guidance: [Preventing youth violence and gang involvement](#)

Drugs

As part of our duty to promote pupils' wellbeing, we have a role to play in preventing drug misuse as part of our pastoral responsibilities (Health and Wellbeing/Healthy Schools) and to support the Government's drug strategy (2017). Network Learning Pathways will support students by providing information, advice and support via the curriculum and give students the confidence, resilience and risk management skills to resist risky behaviours and recover.

The Department of Education and Association of Chief Police Officers have provided [Drug Advice for Schools](#) to support this aim.

Schools also have the power to search pupils for drugs where there is a belief this student is in possession of criminal property. Searches should be appropriate and consider key learning points from Child Q case review.

Radicalisation

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Network Learning Pathways is aware of its responsibilities under the [Prevent Statutory Duty](#) through the Counter Terrorism and Security Act 2015. The duty requires settings to consider the need to safeguard children from being drawn into terrorism. The duty is designed to help ensure that vulnerable individuals who are at risk of radicalisation are supported. We provide a safe environment for our pupils to explore, understand and discuss sensitive topics including terrorism and extremist ideology. We use the curriculum and pastoral care to educate our pupils and to enable them to challenge these ideas and build their resilience to radicalisation. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Staff are aware of the risk posed by other students and adults who may have been radicalised and the impact of radicalisation via social media. Our provision has a clear set of values and standards, upheld and demonstrated throughout all aspects of provision life. These will be underpinned by the our behaviour policy and pastoral support system.

Staff have received appropriate training and have the knowledge and confidence to identify pupils at risk of being drawn into supporting terrorism and extremism and challenge extremist ideals. Our IT filters are regularly reviewed and monitored in order to prevent and identify access to terrorist and extremist materials online.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel Guidance](#).

Network Learning Pathways' Designated Safeguarding Lead (and any deputies) is aware that as a Channel partner may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

[Educate Against Hate](#), has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Honour Based Abuse

So-called 'honour-based' Abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA (regardless of the motivation) should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. If you have concerns about an individual, the following helplines will be able to support you
Honour Network (Karma Nirvana): **0800 5999 247** (Monday to Friday, 9am – 5pm)
Government Forced Marriage Unit **0207 008 0151** or **0207 008 1500** (out of hours)
In emergencies, dial 999.

Further details from the home office on force marriage can be found [here](#)

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Professionals in all agencies, individuals and groups from the wider communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential risk indicators which are detailed in the [Multi-agency statutory guidance on female genital mutilation](#) issued by the home office.

Whilst all staff should speak to the designated safeguarding lead (or deputy) in regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police via 101 (KCSIE 2021). This should be completed in consultation with the DSL but the responsibility of reporting lies with the staff member who identified the concern.

Faith abuse

The National Action Plan to Tackle Child Abuse Linked to Faith or Belief is intended to help raise awareness of the issue of child abuse linked to faith or belief and to encourage practical steps to be taken to prevent such abuse. Schools should promote equality and awareness around cultural and religious practices and be aware of risk factors such as belief in exorcism and spirit possession and children who are scapegoated or blamed for negative events. Schools should have the confidence to tackle abuse such as this and should not shy away from abuse due to cultural sensitivities.

Child-on-Child Abuse

Child-on-child Abuse includes:

- Bullying, including cyber bullying
- Physical Abuse including intimate partner abuse
- Sexual Violence including CSE, Sexual Harassment, Sending nudes and upskirting
- Initiation and Hazing type violence including rituals, challenges, and other activities involving harassment, abuse or humiliation as a way of initiating a person into a group
- Gang violence, threats or coercion

All schools are required to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct that is prohibited under the Equality Act 2010. Schools should tackle prejudice and promote understanding between those who share a protected characteristic and those who do not, as set out in the Equality Act 2010. The definition that has been adopted by the government and should be used when considering prejudice related incidents 'A prejudice related incident is any incident which is perceived to be prejudice by the victim or any other person'. Incidents such as this are reported to the Local Authority Community Safety Team.

Sexual Violence and Sexual Harassment

Sexual Violence and harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exists on a continuum and may overlap, it can occur online and offline (both physical and verbal) and is never acceptable. It is important that **all** children involved are taken seriously and offered appropriate support. A child should never feel that they are causing a problem by reporting child-on-child sexual abuse.

The law says anyone under the age of 13 **can never legally give consent**. This means that anyone who engages in any sexual activity with a child who is 12 or younger is breaking the law. Sexual activity with a child who is under 13 should **always result in a child protection referral**.

Sexually harmful incidents should be viewed by professionals as a safeguarding concern and both victim and perpetrator should be supported. The school should have systems in place to support both students in the school setting to feel safe and heard should an incident occur.

School staff should be alert to negative sexualised or gendered language and behaviours and should be robust in tackling these, not brushing them off as 'part of growing up', 'boys will be boys' or 'banter'.

All staff should be confident of their response to child-on-child abuse as detailed in our Safeguarding and Child Protection Policy.

Domestic violence and abuse, Gender-based violence and teenage relationship abuse

Domestic abuse (over 16 years) and teenage relationship abuse (under 16 years) involves any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are, or have been in relationships or family members regardless of gender or sexuality. The new Domestic Abuse Bill understands the impact domestic abuse at home has on children and has now classified children who witness domestic abuse as victims. This reflects the emotional turmoil and impact on brain development of young people who experience trauma and understands that witnessing abuse can have lifelong implications for young people.

The curriculum should enable children and adolescents to understand what constitutes a healthy relationship, consent and tackle gendered stereotypes.

Online Grooming and Sexual Abuse

Online grooming involves the use of technology to manipulate, exploit, coerce or intimidate a child to (but not limited to) engage in sexual activity, produce sexual material/content, force a child to look at or watch sexual activities, encourage a child to behave in sexually inappropriate ways or groom a child in preparation for sexual abuse (either online or offline). It can also involve directing others to, or coordinating, the abuse of children online. As with other forms of sexual abuse, online abuse can be misunderstood by the child and others as being consensual, occurring without the child's immediate recognition or understanding of abusive or exploitative conduct. In addition, fear of what might happen if they do not comply can also be a significant influencing factor. No child under the age of 18 can consent to being abused or exploited. Financial gain can be a feature of online child sexual abuse, it can involve serious organised crime and it can be carried out by either adults or peers.

Online Safety

The topic of online safety is considerable and can be linked to issues such as child sexual exploitation, bullying and radicalisation. Issues can be categorised into three areas of risk:

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

The provision will ensure it is proactive in addressing online safety through:

- Education of pupils through the curriculum
- Keeping parents up to date on how to support their children to keep safe online
- Reviewing online safety practices as part of a whole provision approach to online safety
- Filtering and monitoring to protect users but not leading to unreasonable restrictions
- Yearly staff training which is integrated, aligned and considered as part of the overarching safeguarding approach
- Information sharing to enable the provision community to be kept up to date

For further information see government guidance [Teaching online safety in school](#)

Child and Adolescent Mental Health

All staff should also be aware that 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

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

Good mental health and resilience are fundamental to our children's physical health, relationships, education and to achieving their potential. We will promote positive self-esteem and tackling behaviours such as bullying that can impact a young person's self-esteem. Pastoral care should be available to those with mental health concerns as well as staff being aware of pathways for young people to Early Help and CAHMS.

Fabricated or induced illness (FII) or Perplexing Presentations

Fabricated or Induced Illness is a clinical situation where a child is, or is very likely to be, harmed due to parents'/carers' behaviour and action, carried out in order to convince doctors that the child's state of physical and/or mental health or neurodevelopment is impaired (or more impaired than is actually the case).

Perplexing presentations indicate possible harm due to fabricated or induced illness which can only be resolved by establishing the actual state of health of the child. Not every perplexing presentation is an early warning sign of fabricated illness, but professionals need to be aware of the presence of discrepancies between reported signs and symptoms of illness and implausible descriptions of illnesses and the presentation of the child and independent observations of the child.

This supplementary guidance, [Safeguarding Children in whom Illness is Fabricated or Induced \(2008\)](#), sets out a national framework within which agencies and professionals at local level – individually and jointly – draw up and agree upon their own more detailed ways of working together where illness may be being fabricated or induced in a child by a carer who has parenting responsibilities for them. For North Somerset procedures on FII or PP please visit [Fabricated or Induced Illness/Perplexing Presentations \(proceduresonline.com\)](#)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the [Local Housing Authority](#) so they can raise/progress concerns at the earliest opportunity.

Children and the Court System

A child may at some point experience the court system for a number of different reasons this may include being a witness to a crime or it could be as a result of childcare arrangement being made in the Family Court. Whatever the reasons it is important the child is supported through this process.

Information on how to support children in the court system can be found in Keeping Children Safe in Education (2024) directs professionals to two guides that support children in the court system, one for 5 to 11 year olds (HM Courts and Tribunals Service, 2017a) and the other for 12 to 17 year olds (HM Courts and Tribunals Service, 2017b).

Children with a Family Member in Prison

Children and young people whereby a family member is in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The *National Information Centre on Children of Offenders* (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Annex B- Managing a Disclosure of Abuse

When a child tells me about abuse, they have suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell them you are pleased that they are speaking to you.
- Never promise confidentiality. Assure them that you will try to help but let the child know that you may have to tell other people in order to do this. State who this will be and why.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Utilise TED questions- Tell, Explain, Describe
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that they have a right to be safe and protected. Ensure the child knows that they are not causing a problem by reporting abuse
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what they have told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Recognise – Respond – Reassure – Record - Refer

Annex C- Reporting a Concern within your Setting

All concerns about children or families whether big or small will be shared with the DSL (or Operations Director if unavailable) as soon as possible in a timely manner (at least within the same day). In our provision, this is recorded via paper copy and LearnTrek.

Staff will be mindful that they should write the concern in the child's own words as much as possible, being careful to maintain fact rather than personal opinion or interpretation. Where injuries are observed this will be recorded on a body map, staff know they must not take photographs of injuries.

Any cause for concern will be shared only with those who need to know.

The DSL will ultimately decide next steps and where a referral is required liaise with the Front Door to Children's Services for next steps. This will be done with consent of the parents unless by doing so would put the child at further risk.

When reporting concerns about staff, the Head of Service and Operations Director will be contacted. Where this is not possible, staff will contact the LADO. Staff should refer to the whistleblowing policy for more information.

At Network Learning Pathways we take necessary steps to encourage learners to raise concerns via their Personal Tutor, or mentor during their time with them each day. Students are reminded that their voices are important and that they are not causing a problem by reporting abuse. Staff will make every effort to ensure a child feels that they are taken seriously and that they will be supported and kept safe. Staff will ensure that no child reporting abuse, neglect or exploitation should ever feel ashamed or judged. Learners will be reminded that we are there to act in their best interests and where possible their wishes and feelings will be taken into account when making any decision.

Annex D - Requesting Involvement from Children's Social Care

If you have concerns about a child who lives in **North Somerset** contact:

Front Door to Family Wellbeing and Children's Social Care

General Enquires

For information about referrals made, or to speak with a specific social worker

01275 888808

Consultation and Advice Line

All enquiries from Professionals in relation to Child Protection

01275 888690

Monday-Thursday 8.45am-5pm, Friday 8.45am-4.30pm

01454 615165

Out of hours/Weekends

Remember in an emergency please ring **999**

For further details on North Somerset policies and procedures, visit their website [here](#)