



# gateways



## Child Protection and Safeguarding Policy

Approved by: **Laurence Field - Date: 30/10/2025**   
CEO  
**Ruth Green –**  
  
Chair of Trustees as at 30-10-25

Last reviewed on:

**November 2025**

**DLS & Chair of Trustees details updated June 2026**

Next review due by:

**November 2026**

UK Provider Number: 10093384

**Gateways, Edgeworth Close, London NW4 4HJ**  
T: 020 8183 0164 E: [info@gateways.org.uk](mailto:info@gateways.org.uk) [www.gateways.org.uk](http://www.gateways.org.uk)

## Table of Contents

1. Important Contacts.....	4
2. Aims, Legislation and Statutory Guidance .....	5
3. Definitions.....	7
4. Roles and Responsibilities.....	8
The designated Safeguarding Lead and other Key Staff .....	8
The Gateways Safeguarding Team .....	8
5. Child Protection Training and Teaching .....	9
6. Identifying and Recognising Signs of Abuse and Neglect .....	9
6.1 Types of Abuse, neglect and exploitation.....	10
6.2 Signs of Abuse.....	11
6.2.1 Signs of possible physical Abuse.....	11
6.2.2 Signs of possible Emotional Abuse .....	11
6.2.3 Signs of possible sexual abuse .....	11
6.2.4 Signs of possible neglect.....	12
6.3 Contextual Safeguarding.....	12
6.4 Children and young people with Special Educational Needs and Disabilities .....	12
6.5 Early Help.....	12
6.6 Other Specific Safeguarding Issues .....	13
6.7 What Staff should do if they have concerns about a Student? .....	13
6.8 Children and Young People absent from education .....	14
6.9 What staff should do if a student goes missing from education? .....	14
6.10 Alternative Provision .....	15
6.11 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including County Lines, and Serious Violence .....	15
6.12 What staff should do if they have concerns that Students are at risk from or involved with serious violent crime? .....	16
6.13 Mental Health .....	16
6.14 So-called Honour Based Abuse.....	17
6.15 FGM Mandatory Reporting Duty .....	17
6.16 What staff should do if they discover an act of Female Genital Mutilation (FGM).....	17
6.17 Students who are lesbian, gay bisexual or gender questioning.....	17
6.18 Forced Marriage .....	18
6.19 Preventing the Radicalisation of Children and Young People.....	18
6.20 What staff should do if a child is seen at risk of radicalisation .....	18
6.21 Online Safety .....	19

6.22 How staff respond to an incident of nudes and semi-nudes being shared by Students .....	19
6.23 Bullying .....	20
6.24 Domestic Abuse .....	21
6.25 What staff should do if a child is in danger of risk or harm.....	21
6.26 Child-on-Child Abuse .....	21
6.26.1 Responding to Reports of Sexual Violence and Sexual Harassment (KCSIE (September 2025)) ....	22
6.26.2 Action following a Report of Sexual Violence and Sexual Harassment .....	23
6.26.3 Options to Manage the Report.....	23
6.26.4 Ongoing Response for the Victim .....	24
6.26.5 Ongoing Response for the Alleged Perpetrator.....	25
7. Reporting Concerns .....	25
8. Options for Action.....	27
9. Allegations .....	27
9.1 Whistleblowing .....	28
9.2 Guidelines For Allegations by one Student Against Another.....	28
10. Safer Recruitment .....	29
11. Confidentiality and Information Sharing/Record Keeping.....	29
Appendix A – Procedure for Dealing with Allegations Against Staff.....	31
Section One: Allegations that meet the harm threshold.....	31
1. Allegations Against Staff .....	31
2. Allegations Against the Head Teacher, CEO or Chair of Trustees.....	31
3. Disclosure of Information .....	32
4. Support .....	32
5. Action to be taken against the Accused.....	32
6. Suspension.....	32
7. Criminal Proceedings .....	33
8. Return to Work .....	33
9. Ceasing to Use Staff .....	33
10. Resignation .....	33
11. Timescales.....	33
12. Unfounded or Malicious Allegations.....	34
13. Record Keeping .....	34
14. Non-Recent Allegations .....	34
Appendix B – Concerns that do not meet the harm threshold .....	35
Section One: Introduction.....	35

Section Two: What is a Low-Level Concern .....	35
Section Three: Thresholds and when this Policy applies .....	35
Section Four: Sharing a Low-Level Concern.....	36
Section Five: Recording the Concern .....	36
Section Five: Anonymity .....	36
Section Six: Responding to Low-Level Concerns.....	37
Section Seven: Records during the investigation.....	37
Appendix C – Role of the Designated Safeguarding Lead .....	38
1. Deputy Designated Safeguarding Leads .....	38
2. Manage Referrals .....	38
3. Work with Others.....	38
4. Training, knowledge and skills .....	39
5. Providing Support to Staff.....	40
6. Understanding the Views of Children and young people .....	40
7. Raise Awareness .....	40
8. Holding and Sharing Information.....	41
9. Availability.....	41
Appendix D: Safeguarding Concerns Referral Flowchart .....	42
Appendix E: Child Protection Flowchart .....	43
Appendix F: Statutory Guidance for Adult Safeguarding.....	44
Appendix G: Vulnerable Adult Safeguarding Definitions of Abuse .....	45
Appendix H: Adult Referral Flowchart .....	48
Appendix I: Child Protection Flowchart .....	49

## 1. Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Samantha Blendis	samantha.blendis@gateways.org.uk
Deputy DSL	Ruth Heller Laurence Field	ruth.heller@gateways.org.uk laurence.field@gateways.org.uk
Local authority designated officer (LADO)	Rob Wratten Rachel Maynard	<a href="mailto:rob.wratten@barnet.gov.uk">rob.wratten@barnet.gov.uk</a> <a href="mailto:Rachel.maynard@barnet.gov.uk">Rachel.maynard@barnet.gov.uk</a>
Chair of trustees	Julia Alberga	julia.alberga@gateways.org.uk
Trustee Lead on Safeguarding	Nicki Cohen	nickicohen@gateways.org.uk
Channel helpline		020 7340 7264

## 2. Aims, Legislation and Statutory Guidance

Safeguarding underpins everything Gateways does with children and young people if they are to thrive in all areas of life at Gateways and beyond. Every member of staff, volunteer or contractor who comes into contact with children and young people at Gateways has a role to play in safeguarding, a responsibility to act and to be confident in reporting concerns, sharing information and putting the child's needs first, regardless of how difficult it might be or how uncomfortable it might feel. Staff are encouraged to maintain an attitude of 'it could happen here'.

This policy has been developed following and is directed by the following legislation, statutory guidance and advice:

- [Children and young people and Social Work Act 2017](#)
- [The School Staffing Regulations \(2009\) which sets out what must be recorded on the single central register and the requirement for at least one person conducting an interview to be trained in Safer Recruitment.](#)
- [Children and young people Missing Education \(September 2016\)](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Keeping Children and young people Safe in Education \(KCSIE September 2025\)](#)
- [Information Sharing: Advice for Practitioners providing safeguarding services to children and young people, young people parents and careers \(2015\)](#)
- [London Safeguarding Children and young people Board Child Protection Procedures 5<sup>th</sup> Edition 2016](#)
- [Prevent Duty Guidance for England and Wales \(March 2015\)](#)

- [The Children and young people Act 1898, 2004](#) *which provides a framework for the care and protection of children and young people.*
- [The Education Act 2002](#)
- [The Female Genital Mutilation Act 2003 \(via the Serious Crime Act 2015\)](#) 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 the age of 18. In addition to [Statutory guidance on FGM](#) which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Prevent Duty \(June 2015\)](#) *which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from extremism and radicalisation.*
- [What to do if you are worried a child is being abused \(March 2015\)](#)
- [Working Together to Safeguard Children and young people \(July 2018\)](#)
- [Voyeurism \(Offences\) Act 2019](#)
- [Working Together to Improve School Attendance May 2022](#)
- [The Equality Act 2010](#) *which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our staff and trustees should carefully consider how they are supporting their students with regard to these characteristics. The act allows Gateways to take positive action to deal with particular disadvantages affecting pupils (where it can be proved to be proportionate). This includes making reasonable adjustments for disabled pupils.*

This policy aims to be a child-centred policy where the needs and views of the students are foremost in the decision-making and in the policy itself. Children and young people want to be respected, their views heard, to have stable relationships with professionals built on trust and to have consistent support provided for their individual needs.

No single professional can have a full picture of a child's needs and circumstances. In order for children and young people and their families to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy is reviewed and signed off annually by the Gateways trustees. There may be a need, either through reviews or a change in staffing, legislation or guidance to update the policy at any time during the year. If this is the case, the Designated Safeguarding Lead would inform the safeguarding lead on the board of trustees. The safeguarding trustee pays regular visits to check that safeguarding processes are in place and being followed.

Gateways fully recognises its duties and responsibilities in respect of child protect and the Safeguarding of all of its students. Every member of staff, volunteers, trustees and contractors are under a general legal duty to:

- Protect all children and young people from all kinds of abuse
- Be aware of Gateways's Child Protection procedures and follow them
- To always act in the best interests of the child, ensuring early help is sought whatever the concern.

Safeguarding and promoting the welfare of children and young people is defined as: protecting children and young people from maltreatment; preventing impairment of children and young people's mental and physical health or development; ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children and young

people to have the best outcomes (KCSIE (September 2025)). Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. “Children and young people” includes everyone under the age of 18.

Gateways is committed to safeguarding and promoting the welfare of children and young people and young people and expects all staff and volunteers to share this commitment.

### 3. Definitions

Safeguarding and promoting the welfare of children and young people is defined as protecting children and young people from maltreatment; preventing impairment of children and young people’s mental and physical health or development; ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children and young people to have the best outcomes.

Abuse is 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. Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (for example, via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children and young people. Abuse can be:

- Physical abuse;
- Emotional abuse;
- Sexual abuse; and/or
- Neglect.

Children and young people with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children and young people. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- The potential for children and young people with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

Every student who comes to Gateways should feel safe and protected from any form of abuse which, in this policy is detailed further in **Section 6**. The Priority for Gateways is to provide all students with a safe, secure and supportive environment within which they can learn, develop and ultimately have the best outcomes.

## 4. Roles and Responsibilities

Everyone associated with Gateways must fully understand and implement the organisations safeguarding policies and procedures relevant to their role and, where these are also provided, guidelines. To enable this to happen Gateways requires all staff to complete safeguarding training appropriate to their role.

### The designated Safeguarding Lead and other Key Staff

Gateways has appointed a member of the Leadership Team to be Designated Safeguarding Lead for Child Protection (DSL). The DSL should take lead responsibility for safeguarding and child protection (including online safety). The role includes liaising with the local authority, and liaising with the Trustee responsible for safeguarding matters, training (staff, trustee and students), secure recordkeeping and transfers of such records as well as maintaining an overview of safeguarding within Gateways.

The DSL has the time, status and authority to be responsible for such matters. They are supported by the CEO in their role. Parents are welcome to contact the DSL if they have any concerns about the welfare of any student at Gateways, whether their concerns relate to their own child, another student at Gateways or any other members of the Gateways community.

Parents or students may also discuss concerns with their regular teachers, The Head of Pastoral Care or any other member of staff who will notify the DSL in accordance with the procedures outlined in **Section 6** 'Identifying and Recognising Signs of Abuse and Neglect' and **Section 7** 'Reporting Concerns'. If a concern relates to a member of staff, parents or students should contact the Chair of Trustees. All staff, including the DSL, will always report allegations of abuse against staff to the Chair of Trustees without delay (see **Section 9** on 'Allegations'). If the concern relates to a Trustee, they should contact the Chair of Trustees. If the concern relates to the Chair of Trustees, then they should contact the Charity Commission.

The DSL receives updated child protection training at least every two years so that they have a complete safeguarding picture. This will include local inter-agency working protocols and training in Prevent Duties. This is supplemented with regular updates, for example, scenario training, e-bulletins and staff meetings at least annually. The DSL has the relevant multi-agency training to make referrals and would normally lead on referrals. The DSL will also support staff who make direct referrals to Social Care and is available for general safeguarding advice for students and parents.

### The Gateways Safeguarding Team

**The Designated Safeguarding Lead (DSL) is Samantha Blendis, a member of the Senior Leadership Team.**

In the absence of the DSL a Deputy DSL should be contacted.

**The Deputy Designated Safeguarding Leads are;**

- Ruth Heller, Director of Education

- Laurence Field, CEO
- Nicki Cohen – Safeguarding and Wellbeing Trustee

## 5. Child Protection Training and Teaching

All staff receive training on how to be aware of indicators, which may signal that children and young people are at risk from, or are involved with serious violent crime, gangs and county lines. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexpected injuries. Unexplained gifts or new possessions could also indicate that children and young people have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff must read and confirm they have understood Part One of KCSIE (September 2025) in order to fully understand and discharge their role and responsibility in terms of safeguarding children and young people. Staff are also expected to read and understand this Safeguarding Policy, where the name and role of the DSL is detailed, in order to fulfil these responsibilities and to be able to respond to safeguarding concerns relating to students or staff.

New staff joining partway through the year will also be issued with a copy of the Child Protection Awareness pack, containing photographs of the DSLs, meet with the (Deputy) DSL, complete Child Protection training online and be issued with a copy of the Safeguarding and Child Protection Policy.

All staff, temporary staff, volunteers and trustees, as part of their induction, should undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). Staff are directed to read the following documents:

- Gateway's Child Protection and Safeguarding policy including the role and identity of the DSLs (this policy) which includes information on Children and Young People absent from education and procedures to deal with child-on-child abuse.
- KCSIE Part 1 (September 2025)
- The Staff Code of Conduct which includes guidance on staff/student relationships and communications using social media.
- Whistleblowing Policy

All trustees of Gateways are required to complete relevant safeguarding training and updates so that they can 'assure themselves that the safeguarding policies and procedures in school are effective and support the delivery of a robust whole school approach to safeguarding' (KCSIE 2025 part 2, paragraph 81).

## 6. Identifying and Recognising Signs of Abuse and Neglect

All Staff should be aware that children and young people may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as

harmful. For example, children and young people may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity. Staff training will cover the types of abuse, neglect and other safeguarding issues or causes for concern and the signs and symptoms in greater detail; the main points are highlighted below.

## 6.1 Types of Abuse, neglect and exploitation

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues rarely stand alone events that can be covered by one definition or label. All staff, but especially the DSL, should consider whether children and young people are at risk of abuse or exploitation in situations outside their families (contextual safeguarding). Extra-familial harms take a variety of different forms and children and young people can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence, county lines and radicalisation.

Types of abuse/neglect (as described in KCSIE (September 2025):

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children and young people of all forms of domestic abuse. Including where they see, hear or experience its effects. Children and young people 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 and young people may be abused by an adult or adults or by another child or children and young people.

**Physical Abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when Parents fabricate the symptoms of, or deliberately induces, illness in a child.

**Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 and young people. 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children and young people. 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 or not the child is aware of what is happening. 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 and young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children and young people 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 and young people. The sexual abuse of children and young people by other children and young people is a specific safeguarding issue in education and all staff should be aware of it. See section on child-on-child abuse.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve Parents 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Complex and Organised Abuse:** may be defined as abuse involving one or more abusers and a number of related or non-related abused children and young people and may take place in any setting. The adults concerned may be acting in concert to abuse children and young people, sometimes acting in isolation or may be using an institutional framework or position of authority such as a teacher, coach, faith group leader or a celebrity position to access and recruit children and young people for abuse. Such abuse can occur both as part of a network of abuse across a family or community and within institutions such as residential settings, boarding schools, in daycare and in other provisions such as youth services, sports clubs, faith groups and voluntary groups. There will also be cases of children and young people being abused via the use of electronic devices, such as mobile phones, computers, games consoles etc which all access the internet and, in particular, social networking websites. Although in most cases of complex and organised abuse, the abuser(s) is an adult, it is also possible for children and young people/young people to be the perpetrators of such harm, with or without adult abusers.

## 6.2 Signs of Abuse

### 6.2.1 Signs of possible physical Abuse

Unexplained injuries, bruising, scalds, injuries on parts of the body where accidental injury is unlikely

- The child may be reluctant for you to contact their Parents, they may flinch when approached or touched, they may be reluctant to change for PE, they may cover their legs and arms even when hot, they may exhibit behaviour which is unusual for them.

### 6.2.2 Signs of possible Emotional Abuse

Failure to grow or thrive, sudden speech disorders, delayed development

- Compulsive nervous behaviour, unwillingness to socialise, excessive fear of mistakes and excessive lack of confidence, reluctance to have their Parents contacted, excessive deference towards others, especially adults.

### 6.2.3 Signs of possible sexual abuse

- Pain, itching, bruising or bleeding in the genital or anal areas, STDs, recurrent urinary tract infections, stomach pain or discomfort when the child is sitting or walking

- Sudden and unexplained changes in behaviour, apparent fear of someone, self-harm, eating disorders or suicide attempts, sexualised behaviour inconsistent with the child's age, reluctance to change for PE, possession of unexplained amounts of money or gifts.

### 6.2.4 Signs of possible neglect

- Being constantly hungry and sometimes stealing food, unkempt, loss of weight or constantly underweight, being dressed inappropriately for the weather conditions, untreated medical conditions
- Being tired all the time, frequently missing School or being late, unable to socialise, often left unsupervised.

## 6.3 Contextual Safeguarding

Safeguarding incidents and / or behaviours can be associated with factors outside Gateways and can occur between children and young people outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and / or behaviours occur. Gateways will, as part of the wider assessment of children and young people, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. Gateways will share as much information with Children and young people's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

## 6.4 Children and young people with Special Educational Needs and Disabilities

Children and young people with special educational needs and disabilities (SEND) can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children and young people. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children and young people with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

## 6.5 Early Help

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health, and care plan)
- has a mental-health need

- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- 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 Pupil Referral Unit
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and / or neglect
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is experiencing, or is at risk of experiencing family ostracism
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is absent from education, particularly on repeat occasions and/or prolonged periods including persistent absences for part of the school day.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the Gateways DSL. The DSL will consider the appropriate action to take. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children and young people's social care if the pupil's situation does not appear to be improving.

## 6.6 Other Specific Safeguarding Issues

All staff are made aware of, and alert to, other specific safeguarding issues, and given particular advice on these, by the DSL in the annual refresher training. Further information can be obtained from the DSL. Under the guidance of Children and Young People Missing in Education (September 2016), Gateways also have a duty to notify the local authority when a student joins or leaves Gateways.

## 6.7 What Staff should do if they have concerns about a Student?

If staff have any concerns about a student (as opposed to a student being in immediate danger), they should, always, speak with the Gateways DSL to agree a course of action, although staff can make a direct referral to Children and Young People's Social Care as set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children and young people safe; they should maintain an attitude of 'it could happen here'. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a student's situation does not appear to be improving, the DSL should press Children and Young People's Social Care

for reconsideration. Staff should challenge any inaction and follow this up with the DSL and Children and Young People's Social Care appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

## 6.8 Children and Young People absent from education

Children and Young People being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Children and Young People missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. It is important that the Gateways response to persistently absent pupils and Children and Young People missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where Children and Young People are already known to local authority Children and Young People's Social Care (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Staff are alert to patterns of regular absence and will alert the DSL in line with other potential safeguarding concerns.

Gateways have an admissions register which is kept accurate and up to date. Gateways, where reasonably possible, will hold more than one emergency contact number for each Student. Gateways monitor Student attendance through the daily register and has a duty to inform the local authority of any Student who fails to attend regularly or has been absent for a continuous period of 15 days or more without permission from Gateways or because of illness, unavoidable cause or religious holiday.

In line with the guidance from 'Working Together to Improve School Attendance', Gateways will work with local authority Children and Young Peoples Services where absence indicates safeguarding concerns and will let the LA know when students leave Gateways at non-transition points. Gateways will also notify the LA within five days of adding a student's name to the admission register at a non-standard transition point. Where the whereabouts of a student is unclear or unknown, Gateways will liaise with the LA and wider authorities where necessary to make enquiries to try to find out where the student is.

Where a parent notifies Gateways in writing that they are home educating, Gateways will delete the students name from the admission register and inform the Local Authority. However, where parents only orally indicate that they intend to withdraw the students to be home educated, Gateways will consider notifying the LA at the earliest opportunity.

Gateways' attendance monitoring systems regularly highlight Students whose attendance falls below 95% to pastoral staff to ensure that attendance is closely monitored, and regular absence is followed up in the best interests of the student. For further information see Absence Policy.

## 6.9 What staff should do if a student goes missing from education?

Students who are absent from education particularly on repeat occasions and / or for prolonged periods, and students missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and / or criminal exploitation, particularly county lines. It is therefore important that the Gateways response to persistently absent students missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them

becoming a student missing education in the future. Gateway's procedures for unauthorised absence and for dealing with students who are absent, repeatedly and / or for prolonged periods, and students absent from education are in the Attendance and Registration Policy.

Where reasonably possible, Gateways will hold more than one emergency contact number for each students to provide Gateways with additional options to make contact with a responsible adult particularly when a student who is repeatedly absent and / or absent for prolonged periods is also identified as a welfare and / or safeguarding concern.

When working with Local Authority Children and Young People's services where school absence indicates safeguarding concerns Gateways will have regard to the non-statutory DfE guidance 'Working Together to Improve School Attendance'.

## **6.10 Alternative Provision**

Where a school places a student with an alternative provision provider, such as Gateways, it continues to be responsible for the safeguarding of that students and should be satisfied that the placement meets the student's needs.

## **6.11 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including County Lines, and Serious Violence**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when activity appears consensual and it should be noted that exploitation does not always involve physical or in-person contact; it can also be facilitated and/or take place online. CSE and CCE can affect both male and female children and young people and can include children and young people who have been moved (trafficked) for the purpose of exploitation.

'County lines' is a term used specifically to describe gangs and organised criminal networks involved in exporting illegal drugs locally drugs using dedicated mobile phone lines or other forms of 'deal line'. This activity can happen locally as well as across the UK. Children and young people are increasingly being targeted and recruited online using social media. Children and young people can become easily trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off or threaten serious violence or kidnap towards victims (and their families) if they attempt to leave the county lines network.

Forms of exploitation may include forcing children and young people to move, store and sell drugs and money through county lines, working in cannabis factories, shoplifting or pickpocketing, being manipulated into committing vehicle crime or threatening/committing serious violence to others. Additionally, going missing and being found in areas away from their home, or being found in accommodation they have no connection with are also possible signs of involvement.

Indicators that signal children and young people are at risk from or involved in serious violent crime include increased absence from school, changes in friendships or relationships with older individuals or groups, significant declines in performance, signs of self-harm or significant changes in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children and young people have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Risk factors which increase the likelihood of involvement in serious violence include being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## **6.12 What staff should do if they have concerns that Students are at risk from or involved with serious violent crime?**

All staff should be aware of indicators which may signal that students are at risk from or are involved with serious violent crime. These may include increased absence from Gateways, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a student (as opposed to a student being in immediate danger), they should, where possible, speak with the Gateways DSL to agree a course of action, although staff can make a direct referral to children and young people's social care.

## **6.13 Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. No member of staff should attempt to make a diagnosis of a mental health problem; any diagnoses must be made by an external medical professional only. Staff, however, are well placed to observe students 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 students have suffered abuse and neglect or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these students experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a student, immediate action should be taken, following the Safeguarding Policy, and communicating with the DSL.

On rare occasions, a student's mental health difficulties may be so severe that Gateways judges that the best way to safeguard a student or other members of our community is to ask parents/guardians not to send the student in. This will always be in consultation with the student's parents/guardians and the external medical professionals who should be involved at this stage. Whilst a student is not attending for mental health reasons, Gateways will continue to provide schoolwork as appropriate, offer pastoral support and engage with external agencies, as necessary. Gateways will collaborate with parents/guardians and medical professionals to ensure a plan for the student to return to school when it is safe for them to do so is in place and regularly reviewed.

## 6.14 So-called 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 community, including 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 are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

## 6.15 FGM Mandatory Reporting Duty

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police, where they discover (either through disclosure by the victim or by visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining Students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

## 6.16 What staff should do if they discover an act of Female Genital Mutilation (FGM)

Staff must report to the police cases where they discover that an act of FGM appears to have been conducted. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve Children and Young People’s Social Care as appropriate. Staff are referred to of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

## 6.17 Students who are lesbian, gay bisexual or gender questioning

The Cass review identified that caution is necessary for students questioning their gender as there remain many unknowns about the impact of social transition and students may well have wider vulnerabilities, including having complex mental health and psychological needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/ carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice. When parents are support pre-pubertal students, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, Gateways will take a cautious approach and consider the broad range of their individual needs, in partnership with the students' parents or carers (other than extremely rare circumstances where involving parents would constitute a significant risk of harm to the student), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

## 6.18 Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or another form of coercion is used to cause a person to enter into a marriage. Staff should report to the DSL any student they believe to be vulnerable. It is now a crime to carry out any conduct whose purpose is to cause a child to marry before the age of 18, even if violence, threats or another form of coercion are not used.

## 6.19 Preventing the Radicalisation of Children and Young People.

Gateways takes its duty to protect students from the risk of radicalisation very seriously. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism as defined under Section 26 of the Counter-Terrorism and Security Act 2015. This duty is known as the Prevent duty. Under paragraph 7 of Prevent, extremism is defined as a “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of our armed forces”.

Gateways aim to protect and safeguard students at risk of radicalisation and staff are alert to, and assess the risk of, students being drawn into terrorism and extremist ideology. Gateways encourage healthy debate and discussion of issues at age appropriate levels and in various areas, not just PSHCE, and it promotes a tolerant, respectful culture across Gateways. Staff use their professional judgment to identify students who might be at risk of radicalisation and who may be in need of help or protection. If a member of staff has concerns over a student at risk they will share that with the DSL who will refer the issue to the local Children and Young People's Social Care/Safeguarding Partnerships and the local Prevent Coordinator and/or Channel Panel, a programme focussing on early support for a child or young person identified as being vulnerable to being drawn into terrorism or radicalisation.

## 6.20 What staff should do if a child is seen at risk of radicalisation

Staff should follow Gateways' normal referral processes when there are concerns about students who may be susceptible to radicalisation into terrorism. This may include a Prevent referral or referral to Children and Young People's Social Care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a student being drawn into terrorism, they must call 999 or the national police Prevent helpline, 0800 011 3764.

Advice and support can also be sought from Children and Young People's Social Care. Gateways, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out an appropriate risk assessment (following consultation with local partners, including

Barnet MASH) of the potential risk in the local area. Such risk assessments are discussed with the CEO, DSL and DDSs and Trustee responsible for safeguarding to ensure Gateways' safeguarding arrangements are sufficiently robust to help prevent and protect students from being drawn into terrorism and are regularly revised.

## 6.21 Online Safety

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children and young people are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children and young people can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around group chats, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or deputy DSL.

The breadth of issues classified within online safety can be categorised into four areas of risk:

- Content (being exposed to illegal or harmful content, e.g. pornography, racism, antisemitism, fake news, misogyny, suicide or extremism)
- Contact (being subjected to harmful online interaction e.g. adults posing as children and young people with the intention of grooming)
- Conduct (online behaviour that increases the likelihood of, or causes, e.g. the sharing of nudes or sending/receiving explicit images or online bullying)
- Commerce (risks such as gambling, phishing, or financial scams).

Measures are in place for appropriate online filters and monitoring systems which should be regularly reviewed to help ensure the online safety of students whilst Gateways. The DSLs monitor and respond to any concerns which are triggered by the filtering and monitoring system. All staff should, as part of their online safety training at induction, gain an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The safeguarding training that staff receive also involves online safety training

Cybercrime is criminal activity committed using computers and/or the internet. Students with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a student in this area, the DSL should consider referring into the Cyber Choices Programme.

## 6.22 How staff respond to an incident of nudes and semi-nudes being shared by Students

All members of staff in an education setting have a duty to recognise and refer to any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes / semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by students under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in one-to-one

messaging or via group chats and / or via closed social media accounts. The images, videos or live streams may include more than one student.

Any direct disclosure by a student will be taken seriously and staff will ensure the student is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible.

The DSL will follow the Department for Digital, Culture, Media and Sport/ UK Council for Internet Safety guidance sharing nudes and semi-nudes: advice for education settings working with children and young people and young people (December 2020) when responding to a report of sharing nudes and / or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children and young people involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children and young people's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.
- If it is determined that there is a risk of harm, the DSL must make a referral to children and young people's social care and/or the police immediately.
- **Childline / IWF: Remove a nude image shared online - Report Remove is a free tool that allows children and young people to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.**

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head Teacher. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

**This guidance does not apply to the sharing of images of children and young people under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.**

## 6.23 Bullying

Gateways have an Anti-Bullying Policy. A bullying incident will be treated as a child protection concern if there is reasonable cause to believe the student is suffering or likely to suffer significant harm. No one person works on their own when dealing with a bullying incident and the threshold for referral is discussed in all cases. Details of cases are reported to trustees in safeguarding reviews throughout the year. Gateways maintains a bullying register of all incidents through CPOMS.

## 6.24 Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children and young people, as victims in their own right, if they see, hear or experience the effects of abuse. The definition of domestic abuse ensures that different types of relationships are captured including ex partners and family members. It can encompass a wide range of behaviours including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected.' Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse. Anyone can be a victim of domestic abuse regardless of gender, age, ethnicity, socio-economic status, sexuality or background and it can take place inside or outside of the home. Experiencing or witnessing domestic abuse can have a serious, long lasting emotional and psychological effect on children and young people and they may sometimes blame themselves for the abuse.

## 6.25 What staff should do if a child is in danger of risk or harm

If staff believe that a student is in immediate danger or at risk of harm, they should make an immediate referral to children and young people's social care and/or the police. Anyone can make a referral, wherever possible this should be done with the DSL. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children and young people's social care. If anyone other than the DSL makes a referral and the DSL is not involved in the initial referral, he or she should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children and young people's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

## 6.26 Child-on-Child Abuse

All staff should be aware that children and young people can abuse other children and young people (often referred to as child-on child abuse). All staff should understand that even if there are no reports at Gateways, it does not mean it is not happening, it may be the case that it is just not being reported. If staff have any concerns about child-on-child abuse they should speak to their DSL or Deputy DSL. Staff should understand the importance of challenging inappropriate behaviours between children and young people, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter,' 'having a laugh,' 'part of growing up' or 'boys being boys' can lead to a culture of unacceptable behaviours, an unsafe environment for children and young people and in worst case scenarios a culture that normalises abuse leading to children and young people accepting it as normal and not coming forward to report it. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based bullying and discriminatory bullying)

- Abuse in intimate personal relationships between children and young people (sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault or causing someone to engage in sexual activity without consent. This may include an online element which facilitates, threatens and/or encourages sexual violence
- Sexual harassment, i.e. unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of School. Sexual harassment is likely to violate a child’s dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.
- Physical behaviour such as deliberately brushing against someone
- Consensual and non-consensual sharing of nude or semi-nude images and/or videos, also known as youth-produced sexual imagery
- Sexual exploitation; coercion and threats
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## 6.26.1 Responding to Reports of Sexual Violence and Sexual Harassment (KCSIE (September 2025))

- Students may make a report about any sexual violence or harassment they experience or witness via the DSL or any other staff member they feel comfortable talking to. They can email [safeguarding@gateways.org.uk](mailto:safeguarding@gateways.org.uk) For reports about discriminatory behaviour, including harmful sexual behaviours, they may also send an email to [safeguarding@gateways.org.uk](mailto:safeguarding@gateways.org.uk)
- If possible, such reports should be managed with two members of staff present, preferably one of them being the DSL or a deputy
- Gateways’ initial response to a report from a student is important. It is essential that ALL victims are reassured that they are being taken seriously and that they will be supported and kept safe
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment nor should they ever be made to feel ashamed for making a report. It’s important to explain that the law is in place to protect young people rather than to criminalise them, and this should be explained in such a way that avoids distressing them
- All staff are trained as part of the annual child protection and safeguarding training how to raise a concern with the DSL.
- If there is ‘reasonable cause to suspect that a student is suffering, or likely to suffer, significant harm’ a referral will be made to appropriate external agencies.

## 6.26.2 Action following a Report of Sexual Violence and Sexual Harassment

- Immediate consideration should be given as to how to best support and protect the victim and the alleged perpetrator (and any other children and young people involved/impacted)
- The starting point regarding any report is Gateways' zero-tolerance approach to any sexual harassment, violence or abuse. Staff will be especially careful not to normalise or allow any implication that such behaviour can be dismissed as 'banter'.
- The DSL will take into account the wishes of the victim in terms of how they want to proceed. 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 will take into account the ages and developmental stages of the children and young people involved and the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- The DSL will take into account any power imbalance between the children and young people e.g. is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- The DSL will consider if the alleged incident is a one-off or a sustained pattern of abuse and consider if there are any ongoing risks to the victim, other students or Gateways staff and also consider other related issues and wider context in line with contextual safeguarding
- Reports of sexual violence or sexual harassment should include the time and location of the incident. Subsequent risk assessments will include any actions to make the location safer
- It is important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

## 6.26.3 Options to Manage the Report

Every report will be considered on a case-by-case basis with the DSL or Deputy DSL taking a leading role and using their professional judgement, supported by other agencies, such as local authority children and young people's social care and the police as required. There are four likely options to consider when making a report:

1. Manage internally – if the DSL considers that the students concerned is not in need of early help or statutory intervention then it may be appropriate to handle the incident internally through utilising Gateways' behaviour and bullying policies and providing pastoral support. It will still be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded
2. Early help – this means providing support as soon as a problem emerges and can be particularly helpful to address non-violent harmful sexual behaviour and may prevent escalation to sexual violence. Multi-agency early help will work best alongside the Gateways' policies and engagement with Parents. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded.

3. Referrals to local authority children and young people’s social care – where a child has been harmed, is at risk of harm, or is in immediate danger the DSL will make a referral to the local children and young people’s social care. Unless there is a compelling reason not to, the DSL will inform the Parents. Gateways will not wait for the outcome of the social care investigation before protecting the victim and other children and young people but will work alongside and co-operate with the relevant lead social worker to ensure the best support possible is implemented for the victim and, where appropriate, the alleged perpetrator and any other children and young people that require support. If the social care’s review of the evidence means they do not believe statutory intervention is relevant, but the DSL is still concerned for the safety of the child, the DSL should be prepared to refer again. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded.
  
4. Reporting to the police – any report to the police regarding a student aged under 18 will generally be in parallel with a referral to children and young people’s social care. The DSL (and deputy) will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made the DSL must pass this on to the police, even if the alleged perpetrator is under ten years old. Unless there are compelling reasons, Gateways will inform the Parents. It will still be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded.

Where there is a safeguarding concern, Gateways should ensure the student’s wishes and feelings are taken into account when determining what action to take. No matter what course of action is followed, Gateways will endeavour to provide support within its own pastoral structures, as well as helping signpost the student(s) to external sources of support where appropriate.

### 6.26.4 Ongoing Response for the Victim

- Gateways will consider the age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim will be paramount. Wherever possible, the victim should be supported to continue in their normal routine.
- Victims may not disclose the whole picture immediately but provide information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. The victim will find it helpful to have a designated trusted adult to talk to and the Gateways will respect this choice
- If the victim finds it difficult to maintain a full timetable, allowances will be made and a physical space to which the Student can withdraw will, where appropriate and possible, be provided
- Gateways will do everything it reasonably can to protect the victim from bullying or harassment as a result of any report they have made and provide ongoing support if necessary, continuing to work with social care and other agencies as required
- Actions will be taken in the best interests of the student involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator.
- If the victim moves to another educational institution Gateways will make them aware of any ongoing support needed.

## 6.26.5 Ongoing Response for the Alleged Perpetrator

- Gateways will be mindful of the difficult balancing act of safeguarding the victim and providing the alleged perpetrator with an education and safeguarding support as appropriate, and implementing any disciplinary sanctions
- Gateways will consider the age and developmental stage of the alleged perpetrator, and the nature of the allegations
- Gateways will consider the proportionality of the response, and support and sanctions should be considered on a case-by-case basis
- Gateways will be mindful that, as well as potentially posing a risk of harm to other students, there is a possibility that the alleged perpetrator may have unmet needs. Their own harmful sexual behaviour may be a symptom of either their own abuse or exposure to abusive practices and/or materials. Gateways may take advice, as appropriate, from children and young people's social care, specialist sexual violence services and the police
- Where a criminal investigation into a sexual assault leads to a conviction or a caution, Gateways should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion
- If the alleged perpetrator moves to another educational institution, the DSL must make them aware of any ongoing support needs and where appropriate.

## 7. Reporting Concerns

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a student or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will act and share information that might be critical in keeping children and young people safe.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children and young people, Young People, Parents and Carers supports staff who must make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within Gateways and with local authority children and young people's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation ('UK GDPR') should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children and young people, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children and young people safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ('DSL').

The trustees will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'.

- understanding that ‘safeguarding of children and young people and individuals at risk’ is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk.
- not providing pupils’ personal data where the serious harm test is met.

All staff should:

- listen carefully
- avoid asking leading questions or closed-type questions
- reassure the individual that the allegation / complaint will be taken seriously and that they will be supported and kept safe.
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report.
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and / or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns.
- determine how best to build trusted relationships with children and young people and young people which facilitate communication.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded on CPOMS. This will help if / when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. Should a student be at risk of immediate harm, the staff member should also see the DSL or Deputy DSL in person without delay in addition to ticking the ‘urgent’ box on CPOMS. All potential evidence must be safeguarded and preserved (for example, scribbled notes, mobile phones containing messages, or screenshots of online evidence, clothing and computers). The information should be kept confidential and stored securely, ensuring that the file is accessible only to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, Gateways will ensure the pupil’s wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. Gateways manages this by ensuring that there are systems in place that are well promoted, easily understood and easily accessible for children and young people to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Gateways operates its processes with the best interests of the student/s at their heart.

## 8. Options for Action

Each concern will be taken on a case-by-case basis and options include:

- Managing any support for the student internally via the Gateways' own pastoral support processes
- Undertaking an early help assessment
- The DSL might seek advice from the relevant local authority Safeguarding Partnerships using, for example, the Barnet MASH. These services might not be anonymous and the DSL will share information about the student, including their name.
- Making a referral to statutory services, for example, as the student might be in need, is in need or suffering or is likely to suffer harm. The parents will be informed about the need to refer whenever possible, except where, in doing so, Gateways would expose the child to further risk. Gateways is not required to gain the consent of parents before referring an incident to the Designated Officer (LADO).
- The DSL or DDSL should always be available to discuss safeguarding concerns. However, it is important to note that in exceptional circumstances where a DSL or Deputy DSL is not available, this should not delay appropriate action taking place and any staff member can refer their concerns directly to the relevant children and young people's social care department.

## 9. Allegations

Gateways will take all reasonable measures to design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations (referring to Part Four of KCSIE (September 2025) which looks at allegations of abuse made against teachers and other staff.

Gateways has procedures for dealing with allegations against staff and volunteers who work with children and young people that aim to strike a balance between the need to protect children and young people from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. These procedures, to be found in the Appendix, follow the guidance in KCSIE (September 2024) (Part Four: Safeguarding Concerns and Allegations made about staff, including supply teachers, volunteers and contractors).

If staff have safeguarding concerns or an allegation is made about another member of staff (volunteers and contractors) posing a risk of harm to children and young people, then this should be referred to the CEO who will contact the LADO, Barnet, promptly and within one working day, without any prior investigation undertaken by Gateways. Any doubts or concerns over an allegation of abuse against a member of staff or apparently borderline cases can be discussed informally with the LADO.

Where appropriate the CEO may consult with the DSL before reporting to the LADO, unless the allegation is against the DSL in which case the CEO will go straight to the LADO. The accused person will be informed as soon as possible after the LADO has been consulted. Appropriate support will be provided, and a representative will be appointed to keep the accused person informed of the progress of the case as appropriate. Gateways would seek suitable legal advice as to due process and appropriate procedure.

Where an allegation is made against the CEO, this should be referred to the Trustee in Charge of Safeguarding without first notifying the CEO. The Trustee in Charge of Safeguarding will inform the Chair of Trustees, Ruth Green, or in her absence Patrick Moriarty.

For an allegation against the Chair of Trustees, this would be reported to the LADO via the CEO.

Suspension will not be an automatic response to an allegation. Gateways has a duty of care to its employees and will offer appropriate advice when allegations are made and following guidance in KCSIE (September 2024) (Part Four: (Safeguarding Concerns and Allegations made about staff, including volunteers and contractors). The LADO will be consulted as to the appropriate action to take and full consideration given to all the options, subject to the need to ensure:

- The safety and welfare of the Students or Student concerned
- The need for a full and fair investigation.

Where an allegation by a Student is shown to have been deliberately invented or malicious, the CEO will consider whether to take disciplinary action.

Where Parents have made a deliberately invented or malicious allegation the CEO will consider (in accordance with the Gateways' terms and conditions) whether to require Parents to withdraw their child or children and young people from Gateways on the basis that they have treated Gateways or a member of staff unreasonably. Gateways reserves the right to contact the police to determine whether any action might be appropriate, whether or not the person making the allegation is a Student or Parents.

Staff are given clear and detailed guidance in the Code of Conduct on ensuring their behaviour or actions do not place them at risk of harm or of allegations of harming a Student.

## 9.1 Whistleblowing

All staff and volunteer should feel able to raise concerns about poor or unsafe practice and potential failures in Gateways' safeguarding regimes and know that such concerns will be taken seriously by the senior leadership team. There will be no retribution or disciplinary action taken against a member of staff for making a report, provided that it is done in good faith. Gateways has a Whistleblowing Policy which explains how to raise such concerns. Were a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they can also contact [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 9.2 Guidelines For Allegations by one Student Against Another

A Student against whom an allegation of abuse has been made may be suspended from Gateways during the investigation process and the Behaviour Rewards and Sanctions Policy will apply. Gateways will take advice from the relevant children and young people's social care and/or the police on the investigation of such allegations and take all appropriate action to ensure the safety and welfare of all Students involved including the Student or Students accused of abuse. If it is necessary for a Student to be interviewed by the police in relation to allegations of abuse, Gateways will ensure that, subject to the advice of the relevant children and young people's social care, Parents are informed as soon as possible and that the Student is supported during the interview by an adult.

## 10. Safer Recruitment

Gateways is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children and young people at Gateways whilst deterring and preventing people who are unsuitable to work with children and young people from applying or securing employment, or volunteering opportunities, with Gateways.

Members of the teaching and non-teaching staff at Gateways including part-time staff, temporary and supply staff, and visiting staff, such as sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, Gateways may undertake an online update check through the DBS Update Service.

Full details of Gateways' safer recruitment procedures for checking the suitability of staff, Trustees and volunteers to work with children and young people and young people is set out in the Recruitment, Selection and Disclosure Policy and Procedure.

## 11. Confidentiality and Information Sharing/Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should include a clear, comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

Gateways (The DSL) will keep all child protection records confidential and secure, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children and young people. Gateways will co-operate with police and children and young people's social care to ensure that all relevant information is shared for the purposes of child protection investigations under the statutory requirements of The Children and young people Act 1989.

In accordance with Working Together to Safeguard Children and young people (July 2018) Gateways recognises that effective sharing of information between professionals and local agencies is essential for effective identification, assessment and service provision. While Student consent to share information will, in all normal circumstances, be sought, Gateways recognises that fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children and young people. The child's views will be taken into account where possible but the DSL and the Head will discuss each case where information might need to be shared with another agency and, if necessary, refer to Information Sharing: Advice for Practitioners providing safeguarding services to children and young people, young people, parents and carers (2015) or seek legal advice.



In line with its obligations Gateways will pass on child protection records when a child or young person changes School. These will be sent confidentially via CPOMS or by using a “signed for” delivery service/confirmation of receipt obtained. A copy may be kept until safe delivery at the new school, and the copy will then be destroyed.

When Gateways is unsure of the student’s next educational setting, it will fulfil its duty to inform the Local Authority that the student may be missing in education.

# Appendix A – Procedure for Dealing with Allegations Against Staff

## Section One: Allegations that meet the harm threshold

Gateways has procedures for dealing with allegations against staff, governors and volunteers who work with children and young people that aim to strike a balance between the need to protect children and young people from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures will be used where the member of staff or volunteer 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 or children and young people in a way that indicates he or she may pose a risk of harm to children and young people
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children and young people. This includes behaviour that may have happened outside of School and is known as transferable risk.

### 1. Allegations Against Staff

The LADO should be informed of all allegations that come to the Gateway's attention and appear to meet the criteria. Where an allegation or complaint is made against the DSL or any other member of staff or a volunteer, the matter should be reported immediately to the CEO. Where appropriate, the CEO will consult with the DSL and all allegations will be discussed with the LADO before further action is taken. When an allegation is made, there are two aspects to consider. The first is looking after the welfare of the child, and if the allegation is about the welfare of a child, then children and young people's social care and as appropriate the police should be contacted directly. The second is investigating and supporting the person subject to the allegation.

### 2. Allegations Against the Head Teacher, CEO or Chair of Trustees

The LADO should be informed of all allegations that come to organisations attention and appear to meet the criteria. Where an allegation or complaint is made against the DSL or any other member of staff or a volunteer, the matter should be reported immediately to the CEO. Where appropriate, the CEO will consult with the DSL and all allegations will be discussed with the LADO before further action is taken. When an allegation is made, there are two aspects to consider. The first is looking after the welfare of the child, and if the allegation is about the welfare of a child, then children and young people's social care and as

appropriate the police should be contacted directly. The second is investigating and supporting the person subject to the allegation.

### **3. Disclosure of Information**

The CEO will inform the accused person of the allegation as soon as possible after the LADO has been consulted. The Parents of the child involved will be informed of the allegation as soon as possible if they do not already know of it. Where the LADO advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Head Teacher should not inform the accused or their Parents until these agencies have been consulted and it has been agreed what information can be disclosed. The Parents should be kept informed of the progress of the case, only in relation to their child – no information can be shared regarding the staff member, and Parents should be made aware of the requirement to maintain confidentiality and avoid unwanted publicity whilst investigations are in progress.

### **4. Support**

A School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, guided by the LADO and the police where necessary. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate. The colleague should be advised to contact their trade union representative or a colleague for support, and employers should provide access to counselling or medical advice where appropriate.

### **5. Action to be taken against the Accused**

Where an investigation by the police or the local authority children and young people's social care services is unnecessary, the LADO will discuss the steps to be taken with the CEO or case manager (or the Chair of Trustees where the allegation is against the CEO). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the CEO how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the Barnet Safeguarding Children and young people Board.

### **6. Suspension**

Suspension must not be an automatic response to an allegation and should only be considered in a case where:

- There is cause to suspect a child or other children and young people at Gateways is or are at risk of significant harm or
- The allegation is so serious that it might be grounds for dismissal

The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment.

## 7. Criminal Proceedings

Gateways will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable. Wherever possible the organisation should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process.

## 8. Return to Work

If it is decided that the person who has been suspended should return to work, Gateways should consider how to facilitate this, for example, a phased return may be appropriate and/or the provision of a mentor to provide assistance in the short term. Gateways should also consider how to manage the contact with the child who made the allegation.

## 9. Ceasing to Use Staff

If Gateways ceases to use the services of a member of staff (or a trustee or volunteer) because they are unsuitable to work with children and young people, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service. Any such incidents will be followed by a review of the safeguarding procedures within Gateways, with a report being presented to the trustees within one month. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

## 10. Resignation

If a member of staff (or a trustee or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by Gateways. Resignation will not prevent a detailed report being made to the Disclosure and Barring Service within one month in appropriate circumstances. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

## 11. Timescales

All allegations must be dealt with as a priority. Where it is clear immediately that the allegation is unfounded or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being

completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the CEO should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

## **12. Unfounded or Malicious Allegations**

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else. In such circumstances, a referral to local authority children and young people's social care may be appropriate.

Where an allegation by a Student is shown to have been deliberately invented or malicious, the CEO will consider whether to take disciplinary action in accordance with Gateways' policy on behaviour, discipline and sanctions.

Where Parents have made a deliberately invented or malicious allegation, the CEO will consider whether to require that the Parents withdraw their child or children and young people from Gateways on the basis that they have treated Gateways or a member of staff unreasonably. Whether or not the person making the allegation is a Student or Parents (or other member of the public), Gateways reserves the right to contact the police to determine whether any action might be appropriate.

## **13. Record Keeping**

Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal pension age or for a period of ten years from the date of the allegation, if this is longer, unless the allegation was found to have been malicious or false, in which case it will be removed from the employee's records.

Other than where allegations are false, malicious, unsubstantiated, or unfounded the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children and young people.

## **14. Non-Recent Allegations**

Where an adult makes an allegation to Gateways that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child should be reported to the LADO in line with local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority social care and the police. Abuse can be reported no matter how long ago it happened.

# Appendix B – Concerns that do not meet the harm threshold

## Section One: Introduction

This section applies to all concerns (including allegations) about members of staff, volunteers and trustees, which do not meet the harm threshold set out in Appendix A above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or another adult within or outside Gateways
- Pre-Employment vetting checks

Gateways recognises the importance of responding to and dealing with concerns in a timely manner to safeguard the welfare of children and young people.

## Section Two: What is a Low-Level Concern

The reporting of low-level concerns should be seen as a neutral act. Gateways recognises that low level concerns cover a broad spectrum of actions and can include intentional and unintentional or in averted behaviour or consequences such as:

- Behaviour that is inconsistent with the staff code of conduct, including inappropriate contact outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider referral to the DSL or LADO

Examples of which may include:

- Showing favouritism
- Being overly friendly
- Using inappropriate language that is sexual, profane, intimidating or offensive
- Inappropriate touching or initiating hugging
- Intimidation, punishment or degrading treatment

## Section Three: Thresholds and when this Policy applies

An 'allegation of harm' is where it is alleged that a person who works with children and young people or adults at risk has or may have behaved in a way that meets the harm threshold as specified below:

- Behaved in a way that has harmed or may have harmed a child at risk

- Possibly committed a criminal offence against or related to a child at risk
- Behaved towards a child or children and young people at risk in a way that indicates they may pose a risk of harm to children and young people at risk
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children and young people at risk (this behaviour includes inside and outside of the workplace)

In this case, staff, volunteers and trustees should follow the guidance above on Managing Allegations and report the matter to the DSL.

The term 'low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child at risk does not meet the harm threshold.

## Section Four: Sharing a Low-Level Concern

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'.

Any low-level concern must be shared with the DSL or DDSL without delay and within 12 hours of the incident or becoming aware of it. The DSL and DDSL can be contacted by emailing [safeguarding@Gateways.org.uk](mailto:safeguarding@Gateways.org.uk).

Where the concern relates to the DSL or DDSL, it must be raised with the Gateways CEO.

If for any reason, a low-level concern is not shared within 12 hours, a delay should never be seen as a barrier to raising it with the DSL.

## Section Five: Recording the Concern

The concern may be shared verbally or in writing. Where raised verbally, the DSL will make a written record at the time or immediately after.

The DSL will use professional judgement to decide the detail to be recorded but it will include:

- Name and role of the person sharing the concern
- Name and role of the person about whom the concern is raised (including their role at the time of the concern)
- Brief context in which the concern arose
- Details of the concern including dates, ensuring information is as accurate as possible and chronological
- The record must be signed and dated. The time the record was made should also be included

## Section Five: Anonymity

Where the person raising the concern wishes to remain anonymous, this will be respected as far as possible. However, to conduct a fair and thorough investigation it may be necessary to use names and so anonymity cannot be promised. In the spirit of an open and transparent culture, staff and volunteers are encouraged to give their consent to be named, wherever possible.

## Section Six: Responding to Low-Level Concerns

Investigation into low-level concern will be done on a discreet basis and on a need to know basis. Upon receipt of a low-level concern, the DSL will take the following actions:

- Speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary has been provided;
- Speak to any potential witnesses (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted);
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO or equivalent professional and/or other relevant external agencies, where they have been contacted);
- Where the concern relates to the individual's behaviour or relationships outside the workplace, the DSL must conduct a risk assessment concerning transferrable risk into the workplace and the safety of children and young people at risk they work or volunteer with
- Review the information and determine whether the behaviour:
  - Is entirely consistent with Gateways code of conduct and the law
  - Constitutes a low-level concern
  - Is not serious enough to consider a referral to the local authority – but may merit consulting with and seeking advice from them
  - When considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO or equivalent local authority professional
  - In itself meets the threshold of an allegation and should be referred to the LADO or equivalent local authority professional.

## Section Seven: Records during the investigation

Whilst conducting the investigation and making decisions, the DSL will make a record of:

- All internal conversations
- All external conversations – for example, with the LADO or equivalent local authority professionals
- The rationale for decisions taken
- Actions to be taken and by whom

The record will include the names, roles, dates and times of conversations; emails and other relevant documentation.

Gateways will retain all records of low-level concerns (including those that are subsequently deemed by the DSL to relate to behaviour which is entirely consistent with the Gateways code of conduct) in a central electronic low-level concerns file, records will be:

- Kept confidential, held securely and comply with DPA 2018 and UK GDPR legislation
- Reviewed so that potential patterns of such behaviour is identified, Gateways will decide a course of action, either through disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold we will refer it to the LADO.
- Retained at least until the individual leaves employment at Gateways

The information on the personnel file will be retained to allow Gateways to hold a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the

allegation was followed up and resolved and a note of any action taken and decisions reached. A copy will be provided to the individual.

## Appendix C – Role of the Designated Safeguarding Lead

The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role-holder’s job description. This person should have the appropriate status and authority within Gateways to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children and young people.

### 1. Deputy Designated Safeguarding Leads

Deputy Designated Safeguarding Lead(s) and any deputies should be trained to the same standard as the Designated Safeguarding Lead and will have the time, status and authority to be responsible for such matters to deputise for the Designated Safeguarding Lead where appropriate.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead; this lead responsibility should not be delegated.

### 2. Manage Referrals

The Designated Safeguarding Lead is expected to:

- Refer cases of suspected abuse to the local authority children and young people’s social care as required
- Support staff who make referrals to local authority children and young people’s social care
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and
- Refer cases where a crime may have been committed to the police as required.

### 3. Work with Others

The Designated Safeguarding Lead is expected to:

- Liaise with the CEO to inform them of issues, especially ongoing enquiries under Section 47 of The Children and young people Act 1989 and police investigations. This should include being aware of the requirement for children and young people to have an Appropriate Adult
- Liaise with the “case manager” and the LADO at the local authority for child protection concerns which concern a staff member
- Liaise with relevant staff (e.g., SENCO/ pastoral team) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children and young people’s needs are considered holistically
- Liaise with the mental health support team where safeguarding concerns are linked to mental health
- Promote supportive engagement with Parents and Carers in safeguarding and promoting the welfare of children and young people, including where families may be facing challenging circumstances
- Work with the CEO and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children and young people in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children and young people’s attendance, engagement and achievement at Gateways. This includes: ensuring that Gateways know who its cohort of children and young people who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to provide additional academic support or reasonable adjustments to help children and young people who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children and young people’s educational outcomes.
- Know those children and young people with a social worker and maintain a culture of high aspirations for this cohort
- Act as a source of support, advice and expertise for staff
- Act as a point of contact with the safeguarding partners.

## 4. Training, knowledge and skills

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, including local criteria for action and local referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

- Understand the importance of the role the DSL has in providing information and support to children and young people social care in order to safeguard and promote the welfare of children and young people
- Understand the lasting impact that trauma and adversity can have, including on children and young people's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- Are alert to the specific needs of children and young people in need, those with special educational needs, those with relevant health conditions and young carers
- Understand the importance of information sharing, both within Gateways and with the safeguarding partners, other agencies, organisations and practitioners
- Understand and support Gateways with regard to the requirements of the Prevent duty and are able to provide advice on and support to staff in protecting children and young people from the risk of radicalisation
- Understand the unique risks associated with online safety and are confident they have the relevant up to date knowledge to keep children and young people safe whilst they are online at school
- Can recognise the additional risks that children and young people with SEN face online, for example from online bullying, grooming and radicalisation and have the capability to support children and young people with SEN to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses and
- Encourage a culture of listening to children and young people and taking account of their wishes and feelings, among all staff, in any measures Gateways may put in place to protect them.

## 5. Providing Support to Staff

Training should support the DSL in developing expertise, so they can support and advise staff and help them to feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes and
- support staff to consider how safeguarding welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

## 6. Understanding the Views of Children and young people

It is important that all children and young people feel heard and understood. Therefore, DSLs (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to students and taking account of their wishes and feeling, among all staff, and in any measures Gateways may put in place to protect them, and,
- understand the difficulties that children and young people may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

## 7. Raise Awareness

The Designated Safeguarding Lead should:

- Ensure each member of staff has access to, and understands, Gateways' Safeguarding Policy and procedures, especially new and part-time staff
- Ensure Gateways' Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure Gateways' Safeguarding Policy is available publicly and Parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Gateways in this
- Link with the local Safeguarding Partnerships to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children and young people who have or have had a social worker are experiencing with teachers and other Gateways leadership staff.

## 8. Holding and Sharing Information

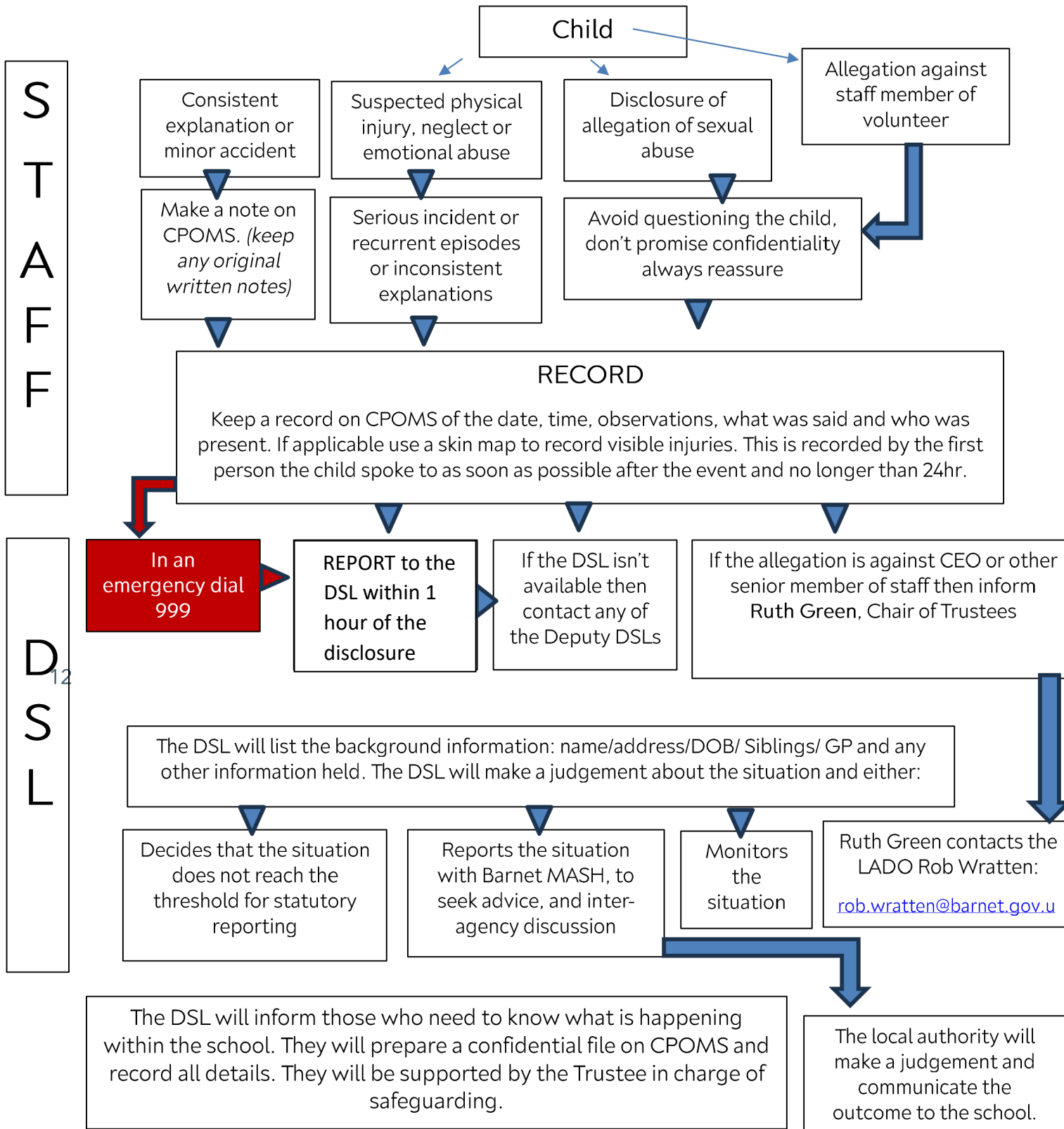
The Designated Safeguarding Lead should be equipped to:

- Understand the importance of information sharing, both within Gateways, and with other schools and colleges on transfer including in-year and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection act 2018 and the UK General Data Protection Regulation (GDPR)
- Be able to keep detailed, accurate, secure written records of concerns discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

## 9. Availability

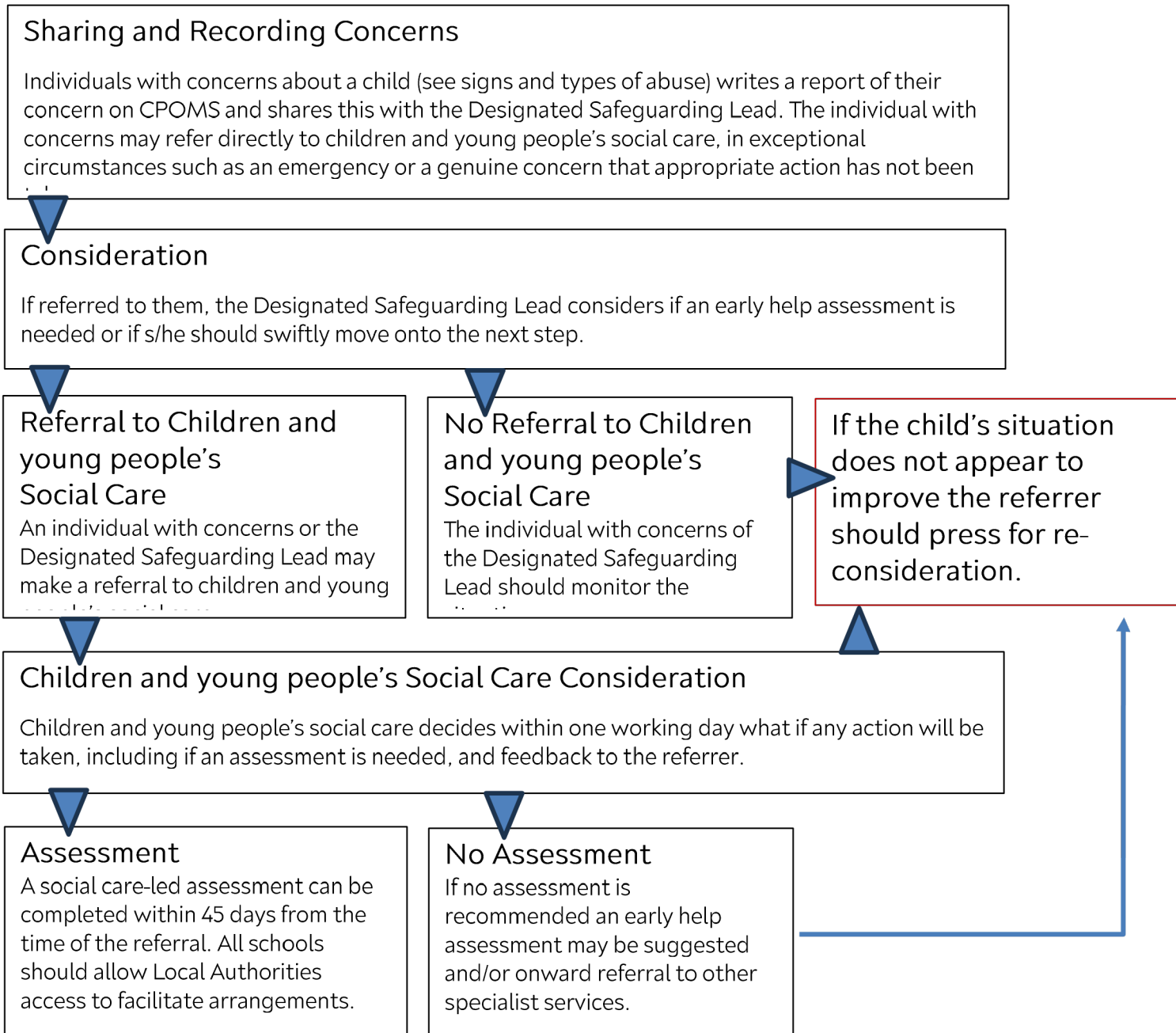
During term time the Designated Safeguarding Lead (or a deputy) should always be available (during School hours) for staff at Gateways to discuss any safeguarding concerns.

# Appendix D: Safeguarding Concerns Referral Flowchart



# Appendix E: Child Protection Flowchart

This diagram illustrates what action should be taken and who someone should take their concerns to if they have any about a child. If at any point, there is risk of immediate serious harm to a child, a referral should be made to children and young people’s social care immediately. **Anyone can make a referral.**



# Appendix F: Statutory Guidance for Adult Safeguarding

Gateways straddles across two main cohorts, children and young people as well as adults. We recognise that health, wellbeing, ability and the need for care and support can affect a person's resilience. We understand that some people experience barriers, for example, to communicate concerns or seeking help. Actions taken by Gateways will be consistent with the following general statutory guidance relevant to adult safeguarding ensuring that everyone associated with the organisation feels confident to take action where necessary.

- **The Care Act 2014** – Which came into effect in 2015, it's focus is putting people and their carers in control of their care and support. The Act combines various existing pieces of legislation which previously shaped how social care was arranged in Britain.
- **Health, Safety and Welfare Act 2006** – A general duty for employers to protect and ensure a safe space for employees and volunteers.
- **Safeguarding Vulnerable Groups Act 2006** – All people working with adults at risk should be appropriately checked if they are undertaking a regulated activity on a regular basis.
- **Equality and Diversity Act 2010** – Consolidating previous anti-discrimination law in the UK, requiring equal treatment to all.
- **Human Rights Act 1998** – Article 14; duty to protect. Public authorities have a proactive duty towards Adults at Risk to take 'reasonable steps to prevent ill-treatment.
- **The Mental Capacity Act 2005** – Protects adults by providing a legal framework to empower and support individuals who may lack the mental capacity to make their own decisions, ensuring that decisions made on their behalf are in their best interests whilst respecting their autonomy and rights.

Working in tandem with statutory guidance relating to the Safeguarding of Children Young People Gateways will take a holistic approach to Safeguarding of vulnerable adults.

# Appendix G: Vulnerable Adult Safeguarding

## Definitions of Abuse

Abuse is a form of maltreatment and can be both self-inflicted or inflicted by others. Abuse can take place at home, school, or within any physical environment. It can also happen in an online or virtual environment such as on social media or in gaming apps.

An abuser may be anyone, but they are often known by the victim. An abuser will make every effort to build a trusting relationship with the victim and will often befriend or seek to maintain the respect of friends and colleagues alike, this is called grooming.

Abuse can occur in any relationship at any time. It may result in significant harm to, or exploitation of the person subjected to it.

**Emotional/ Psychological** – Persistent emotional maltreatment of a person that results in their wellbeing or development being impaired. Some form of emotional abuse is involved in all types of abuse, however, it can also occur on its own.

**Physical** – An individual’s body being injured or hurt e.g. hitting, pushing or assault. Physical abuse can also be other forms i.e. drowning, inflicting illness upon another. It is always intentional hurtful and harmful.

**Sexual** – Involvement in a sexual act where the person does not wish to be involved, is coerced or does not have the understanding to make an informed choice e.g. rape, sexual assault, inappropriate touching or exposure for example, images or filming.

**Neglect / Act of Omission** – The failure to prevent harm that damages or impairs growth or development by not meeting a person’s basic physical or mental needs.

**Discriminatory Abuse** – Discriminatory abuse is when someone picks on a person because something about them is different. This can include unfair or less favourable treatment due to a person’s race, sex, gender reassignment, age, disability, religion or belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy or maternity.

Signs of possible discriminatory abuse include but are not limited to: harassment, offensive materials or graffiti, verbal abuse, gestures or statements which are unwelcome and intended as insults, threatening or obscene behaviour, jokes of a derogatory nature, bullying, offensive language or violence, excluding or treating differently preventing contact with particular individuals.

**Domestic Abuse** – Abuse or violence in a relationship is about a pattern of behaviour that one person uses against another to intimidate them and get them to do what they want. Domestic abuse is any incident of threatening behaviour, violence or abuse. Domestic abuse will include, emotional, psychological, physical, sexual and financial abuse between those who are or have been intimate partners or family members, regardless of gender, sexuality, age, race, wealth or geography.

**Financial or Material Abuse** – Financial Abuse or Material Abuse is the theft or misuse of a person’s property or assets. Signs of possible Financial or Material Abuse include but are not limited to: money going missing and/or having no cash available, small items disappearing regularly, unusual or inappropriate financial transactions, person is without belongings, clothes or services which they can afford, Person managing financial affairs appears evasive or difficult, carer seeks to secure financial assets rather than provide

personal care, recent or long-lost relatives or acquaintances expressing sudden or disproportionate affection for a vulnerable adult with money or property, recent changes to their legal documents.

**Organisational Abuse** – Organisational abuse is the mistreatment, abuse or neglect of vulnerable adults by an organisation or its personnel. It can take place within settings and services that children or vulnerable adults live in or use, and it violates their dignity, resulting in a lack of respect for their human rights. It can take the form of an organisation failing to respond to or address incidents of poor practice brought to its attention. Organisational Abuse means that a culture is created where emotional, physical and sexual abuse become acceptable and can be regarded as the norm. As part of that culture all too often visits are discouraged and the involvement of friends and relatives are kept to a minimum.

**Criminal Exploitation: County Lines** - Criminal exploitation: county lines - Criminal exploitation of vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines is missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. It can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threat of violence. It can be perpetrated by individuals or groups, males or females, and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**Grooming** - Grooming is the planned and deliberate act of manoeuvring another individual into a position that makes them more isolated. They become dependent and likely to trust the abuser, and more vulnerable to abusive behaviour. Grooming occurs when someone builds an emotional connection with a child or vulnerable adult to gain their trust for the purposes of abuse or exploitation. They can be groomed online or in person, by a stranger or by someone they know – for example a family member, friend or professional. Groomers can be male or female. They can be any age. The internet has created new opportunities for abusers to target the vulnerable. They do this by taking advantage of an unsuspecting individual and then proceed to groom. Because the internet is largely unregulated, it has become a significant tool for manipulation in the hands of an abuser. Caring and concerned adults may also be groomed by the abuser, winning their trust, and as a result a situation which should cause concern becomes acceptable. Those affected may not realise they have been groomed, or that what has happened is abuse and abusers will try to overcome a child or an adult's natural resistance in stages by: making and sustaining contact offering gifts or rewards as bribes using secrecy and possible threats so that they become isolated introducing them to abuse that appears natural.

**Radicalisation** - Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. It may follow experience of racism or discrimination. They believe that joining a movement offers social and psychological rewards such as adventure, camaraderie and a heightened sense of identity. Signs of possible radicalisation include but are not limited to: changes in behaviour sense of isolation or failure expression of extremist views use of inappropriate language – racist or hate terms supporting violent methods and actions accessing extremist material online, including through networking

sites (eg. Facebook, YouTube) travel for extended periods to international locations known to be associated with extremism.

**Self-harm** - Self-harm is the act of deliberately causing harm to oneself either by causing a physical injury or by putting oneself in dangerous situations. Self-harm is primarily a coping strategy and can provide a release from emotional distress and enable an individual to regain feelings of control. There is no typical person who self-harms. It can be anyone. Signs of possible self-harm include but are not limited to: covering up cut marks with clothing frequent thoughts of helplessness, hopelessness, or worthlessness shame, guilt, low self-esteem unexplained injuries fear depression loss of sleep unexplained weight loss or gain confusion unexpected or unexplained change in behaviour feeling guilty.

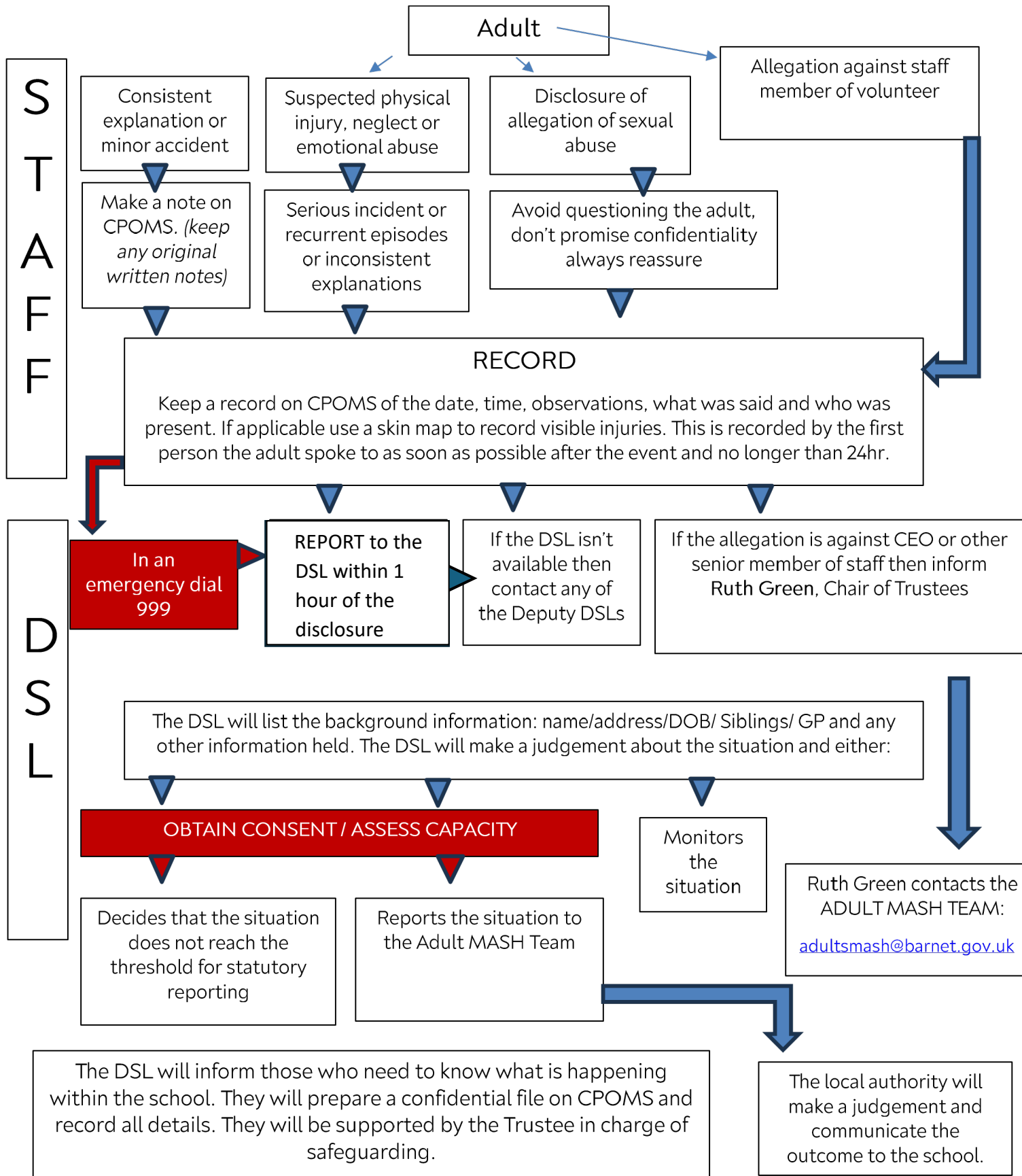
**Self-neglect** - Self-neglect is neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Possible signs indicating self-neglect can be found under the heading of Neglect in this section. Sexual exploitation Sexual exploitation is a type of sexual abuse in which children or vulnerable adults are sexually exploited for money, power or status. Some children and vulnerable adults are trafficked into or within the UK for this purpose. They may be tricked into believing they are in a loving, consensual relationship. Abusers will use various means to gain compliance such as drugs, alcohol, gifts, threats and bribes. Signs of possible sexual exploitation include but are not limited to: being missing from home or care physical injuries drug or alcohol misuse involvement in offending repeated sexually-transmitted infections, pregnancy and terminations absence from school change in physical appearance being estranged from their family inappropriate use of social networking sites and other media devices receipt of gifts from unknown sources recruiting others into exploitative situations poor mental health, self-harm thoughts of or attempts at suicide.

**Distribution of nudes and semi-nudes** – this is when someone shares sexual, naked or semi-naked images of themselves or others, or sends sexually explicit pictures. This is illegal in the UK.

**Drug or alcohol misuse** – is a pattern of behaviour which changes or alters the mood or mental state of an individual. Substances that can cause harm can be illegal or legal i.e. pain relief, glues etc.

**Gambling addiction** - is the inability to stop gambling when losses begin to take a toll on relationships, finances and career. Gambling addiction often co-occurs with alcohol abuse or drug addiction and it can make people very vulnerable to coercion and/or mental health issues.

# Appendix H: Adult Referral Flowchart



# Appendix I: Child Protection Flowchart

This diagram illustrates what action should be taken and who someone should take their concerns to if they have any about an adult. If at any point, there is risk of immediate serious harm to an adult, a referral should be made to adult social care immediately. **Unless, the adult lacks capacity, consent must be obtained prior to a referral being made.**

