



## MINDS LEAD ALTERNATIVE PROVISION SAFEGUARDING AND CHILD PROTECTION

**POLICY: Authors: Katie Leivers**

**Policy Created: September 2025**

**Policy Reviewed: September 2026)**

### 1. Policy Statement

### 2. Key Safeguarding Principles

### 3. Legislation and Statutory Guidance

### 4. Roles and Responsibilities

- Designated Safeguarding Lead (DSL) & Deputy Designated Safeguarding Lead (Deputy DSL)
- Responsibilities of All Staff
- Safeguarding Team and External Agency Partnerships

### 5. Recognising Responding and Reporting Safeguarding Concerns

- Definitions of Safeguarding and Child Protection
- Signs and Indicators of Abuse
- Types of Abuse and Neglect

### 6. Online Safety and E-Safety

- Online Risks (Content, Contact, Conduct, Commerce)
- Filtering and Monitoring
- AI and emerging risks

### 7. Support for Students and Mental Health Considerations

- Trauma-Informed Approaches
- Early Help and Intervention
- Mental Health First Aid

### 8. Safer Recruitment and Staff Conduct

- Pre-Employment Checks
- Induction and Ongoing Training
- Staff Code of Conduct

### 9. Children Missing from Education (CME) and Attendance Monitoring

- Risks of Persistent Absence
- Legal Responsibilities and School Actions

### 10. Specific Safeguarding Issues

- Domestic Abuse and Operation Encompass
- Female Genital Mutilation (FGM)
- Forced Marriage
- Radicalisation and Prevent Duty
- County Lines and Criminal Exploitation
- Modern Slavery and Human Trafficking

### 11. Managing and Supporting Safeguarding Cases

- Children in Care (LAC)
- Child Protection
- Children In Need

### 12. Policy Review and Monitoring

1. Annual Safeguarding Audits
2. Staff Training Compliance Tracking
3. Policy Updates and Change

### 13 Allegations Management

---

## 1. POLICY STATEMENT

At Minds Lead Alternative Provision, safeguarding and the welfare of our students are paramount. We are committed to fostering a safe, inclusive, and supportive environment where children are protected from harm and empowered to succeed.

Safeguarding is at the forefront of all decisions, interventions, and day-to-day interactions. Mind Lead complies with statutory requirements and best practice guidance, working in partnership with local safeguarding agencies to uphold the highest standards of child protection.

This policy sets out our commitment to:

- **Ensuring all children feel safe and supported** within our provision.
- **Early intervention** to identify and mitigate risks before harm occurs.
- **Regular staff training and development**, ensuring all staff are confident in safeguarding procedures.
- **Effective collaboration** with social care, police, health services, and external safeguarding partners.

---

## 2. KEY SAFEGUARDING PRINCIPLES

Mind Lead Alternative Provision adheres to the following core principles in safeguarding:

**Best Interests of the Child:** The welfare of the child is the paramount consideration in all decisions.

**Early Help and Preventative Action:** Identifying risk factors and implementing interventions before concerns escalate

**Listening to young people:** Encouraging student voice and ensuring children feel heard and believed.

**Accountability and Transparency:** Clear policies, rigorous oversight, and accountability mechanisms.

**Inclusive and Non-Discriminatory:** Providing equal protection to all children, regardless of background.

**Multi-Agency Working:** Effective partnerships with social care, law enforcement, and specialist safeguarding services.

---

## 3. LEGISLATION AND STATUTORY GUIDANCE

This policy is written in accordance with statutory safeguarding guidance, including:

- **DfE Arranging Alternative Provision (2025)**

- **Keeping Children Safe in Education (2025)**
- **Working Together to Safeguard Children (2023)**
- **Education Act 2002 (Section 175)**
- **Children Act 1989 & 2004**
- **Serious Crime Act 2015 (FGM Duty)**
- **Counter-Terrorism and Security Act 2015 (Prevent Duty)**
- **Sexual Offences Act 2003**
- **Data Protection Act 2018 and GDPR**

We also comply with the local safeguarding arrangements established by the Nottingham City Safeguarding Children Partnership.

At MINDS Lead, safeguarding and promoting the welfare of children is central to our mission. We are committed to providing a secure and nurturing environment where all children are safeguarded from harm, their health and development are supported, and they have opportunities to reach their full potential.

We uphold the principle that every child—regardless of age, gender, ability, culture, race, language, religion, or sexual identity—has an equal right to protection. The safety and well-being of children remain our top priority in all aspects of our provision.

All members of staff have a shared responsibility to act promptly and appropriately when concerns arise about a child’s welfare. We rigorously follow the guidance outlined in Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023) to work effectively with external agencies, including the Nottingham City Safeguarding Children Partnership, to uphold best practices in safeguarding.

As a provision, we recognise the link between safeguarding and fostering a positive, safe, and inclusive culture. In alignment with the government’s agenda to promote fundamental British values and uphold the rule of law, we ensure that safeguarding practices are embedded within the ethos of Minds Lead.

We have a moral and statutory duty to safeguard and promote the welfare of all students in our care. Through our established safeguarding procedures, we remain proactive in identifying risks, addressing concerns, and ensuring that children receive the necessary protection, support, and access to justice. Our commitment is to provide a safe space where children feel respected, valued, and supported in their educational journey.

#### **4. Role & Responsibilities**

The Provision Minds Lead plays a key role in ensuring a proactive approach to safeguarding and child protection. They work closely with the DSL to create a culture where safeguarding is embedded into the fabric of the provision’s ethos. Their responsibilities include:

- Promoting a safeguarding-first approach within the provision, ensuring staff are aware of their responsibilities in identifying and addressing safeguarding concerns.

- Supporting the implementation of safeguarding policies and procedures, ensuring they are effectively followed across the provision.
- Engaging with staff, students, and external agencies to enhance awareness and understanding of safeguarding risks, including contextual safeguarding.
- Contributing to staff training on mental health, well-being, and safeguarding-related matters to equip them with strategies to support vulnerable students.
- Collaborating with the DSL in risk assessments, intervention planning, and reviewing safeguarding cases where necessary.
- Ensuring a whole-provision approach to preventative education, embedding safeguarding awareness within RSHE, behaviour policies, and pastoral care frameworks.
- Supporting a culture of zero tolerance for discrimination, harassment, and any form of abuse, ensuring students feel safe and empowered to report concerns.
- Ensuring all safeguarding policies align with the 3 Safeguarding Partners and local authority procedures.
- Providing a safe space for pupils who are LGBTQ+ to speak out, be proud, and share their concerns.
- Supporting students in understanding key safeguarding topics, such as healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, self-esteem, sexual consent, sexual exploitation, coercion, harassment, and accessing support.
- Ensuring effective safeguarding responses to children who go missing from education or are at risk of serious harm, such as child criminal exploitation (CCE) or county lines involvement.

---

## **4.2 Designated Safeguarding Lead (DSL) Responsibilities – *Katie Leivers***

The DSL has overall responsibility for safeguarding and child protection within the provision. They are the main point of contact for all safeguarding concerns and work with staff, students, parents, and external agencies to ensure a robust safeguarding culture. Their responsibilities include:

- Taking lead responsibility for safeguarding and child protection, ensuring compliance with statutory requirements and local safeguarding procedures.
- Being available during provision hours for staff to discuss safeguarding concerns and taking appropriate action, including making referrals where necessary.
- Providing advice, guidance, and support to all staff on safeguarding matters, including handling disclosures and reporting procedures.
- Ensuring all safeguarding records, reports, and documentation are accurate, up-to-date, and securely stored.

- Working closely with local safeguarding partners, children’s social care, and external agencies to support early intervention and child protection strategies.
- Leading safeguarding training for staff, ensuring all members understand their responsibilities and statutory obligations.
- Overseeing the provision’s approach to online safety, ensuring filtering and monitoring systems are effective in protecting students from online risks.
- Ensuring safeguarding and child protection is included in recruitment, induction, and ongoing staff training.
- Leading response strategies for incidents of sexual violence, harassment, or other serious safeguarding issues, ensuring appropriate support for all involved parties.
- Attending and contributing to multi-agency meetings and strategy discussions as necessary.
- Ensuring that staff are aware of their duty to make referrals to local authority children’s social care and statutory assessments where needed.
- Supporting staff in identifying emerging safeguarding issues, ensuring that early help assessments are conducted where necessary.
- Ensuring compliance with the Sexual Offences Act 2003, specifically in relation to the position of trust that staff hold over students.

---

### 4.3 All Staff Responsibilities

All staff will:

- Read and understand part 1 and annex B of the Department for Education’s statutory safeguarding guidance, *Keeping Children Safe in Education*, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to confirm that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers, including making them aware of what students are asked to do online.
- Provide a safe space for pupils who are LGBTQ+ to speak out, be proud, and share their concerns.
- Be aware of and adhere to all safeguarding policies and procedures, including the child protection and safeguarding policy, staff code of conduct, behaviour policy, eSafety policy, and the safeguarding response to children who go missing from education.
- Understand the early help assessment process and their role in identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

- Know how to make referrals to local authority children's social care and understand the statutory assessments that may follow a referral, including their expected role.
  - Recognise the signs of different types of abuse and neglect, as well as specific safeguarding concerns such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of serious violent crime, FGM, and radicalisation.
  - Be able to reassure students making disclosures that they are being taken seriously and will be supported and kept safe.
  - Recognise that children can be at risk of harm both inside and outside the provision, at home, and online.
  - Be aware that children who are (or who are perceived to be) LGBTQ+ can be targeted by other students and need appropriate support.
  - Know what to look for to identify children who need help or protection.
  - Support a culture of safeguarding by promptly reporting concerns and ensuring that no safeguarding issue is ignored.
- 

## **4. Recognising and Responding to Safeguarding Concerns**

### **4.1 Recognising Concerns**

There are four forms of child abuse recognised in legislation:

- **Physical abuse**
- **Neglect**
- **Sexual abuse**
- **Emotional abuse**

It is important to note that these types of abuse often occur in combination rather than in isolation. For example, a physically abused child may also suffer emotional abuse, and a sexually abused child may also be neglected.

Recognising and responding to signs of abuse or neglect is of utmost importance at Mind Leads. We are committed to providing a safe environment for all our students.

#### **Signs of Physical Abuse:**

- Unexplained burns, bites, bruises, broken bones, or black eyes.
- Bruises or marks appearing after a period of absence.
- Fear or resistance towards parents or caregivers and distress when going home.
- Fearful or shrinking response in the presence of adults.
- Reporting injuries caused by a parent or caregiver.
- Conflicting, unconvincing, or no explanation provided for injuries.

- Harsh physical discipline or extremely negative descriptions of the child by a caregiver.

### **Signs of Sexual Abuse:**

- Difficulty walking or sitting.
- Reluctance to change for physical activities or participate.
- Nightmares or bedwetting.
- Sudden changes in appetite.
- Displaying inappropriate sexual behaviours or knowledge.
- Pregnancy or sexually transmitted infections, particularly under age 14.
- Running away.
- Disclosing sexual abuse.
- Overprotective behaviour or limiting contact with the opposite sex.
- Secretive or isolated behaviour.
- Controlling behaviour from family members.

### **Signs of Neglect:**

- Frequent absences from provision.
- Begging or stealing food or money.
- Lack of necessary medical or dental care, immunizations, or glasses.
- Consistently appearing dirty with severe body odour.
- Inadequate clothing for weather conditions.
- Substance abuse.
- Stating there is no one at home to provide care.
- Indifference, apathy, depression, or bizarre behaviour in the caregiver.

### **Signs of Emotional Abuse:**

- Extreme behaviour (overly compliant, demanding, passive, or aggressive).
- Inappropriately assuming adult or infantile behaviours.
- Delayed physical or emotional development.
- Suicide attempts.
- Expressing a lack of attachment to the caregiver.
- Constant blaming, belittling, or berating of the child.
- Indifference towards the child or rejecting offers of help for their problems.

## **Female Genital Mutilation (FGM)**

FGM is illegal in the United Kingdom, both within the country and abroad. Those guilty of allowing FGM to take place face fines and up to fourteen years in prison.

There is a specific legal duty on teachers. If a teacher, in the course of their professional work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they must report this to the police. Training is provided to staff to ensure full understanding of this issue.

All other staff should speak to the DSL (or Deputy DSL) with any concerns about FGM. The DSL has undertaken additional training in this area.

### **8.2 Managing Disclosures**

If a child discloses a safeguarding issue to you:

- Listen actively and believe them.
- Allow time for them to speak freely without interruption or leading questions.
- Stay calm and do not show shock or distress.
- Reassure the child that they have done the right thing by telling you.
- Explain the next steps and that you must pass this information on. Do not promise confidentiality.
- Write a detailed report as soon as possible using the child's own words, sticking to information without personal judgment.
- Report the disclosure immediately to the Safeguarding Team.

### **8.3 Reporting Concerns**

All safeguarding concerns must be shared with relevant parties. If a student is dual registered with a school, that school must also be made aware of any concerns and the actions being taken.

All safeguarding concerns, discussions, and actions taken must be reported immediately to the DSL or a Deputy DSL. Staff should provide as much detail as possible, including:

- A summary of the concern.
- Actions taken, including whom they reported it to.
- Any follow-up required.
- Next steps as advised by the Safeguarding Team.

Staff must record concerns using secure email and password-protected files, ensuring information is shared safely within the organisation. No information should be shared outside of approved safeguarding procedures.

#### **Recording a Concern:**

- Write up your conversation as soon as possible using the child's own words.

- Stick to the facts and do not include personal judgments.
- Ensure detailed reports are stored securely and shared only with authorised safeguarding personnel.

**Understanding Barriers to Disclosure: Staff should be aware that some children may:**

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

These barriers should not stop staff from having a professional curiosity and reporting any concerns to the DSL.

**Early Help Assessment:**

- If an early help assessment is appropriate, the DSL will liaise with relevant agencies and lead inter-agency discussions.
- Staff may need to support other professionals involved in an early help assessment.
- The DSL will continuously review the case and escalate to local authority children's social care if necessary.

**Referral Process:**

- If necessary, the DSL will refer the case to Children's Social Care or the Police.
- In Nottingham City, referrals are completed via the Multi-Agency Referral Form (MARF), submitted online to Children and Families Direct.
  - [Nottingham MASH Referral Form](#)
- The local authority will decide on the next steps within one working day and inform the referrer of the outcome.
- If the referrer does not receive a response, they must follow up to ensure action has been taken.
- If concerns persist after the referral, escalation procedures must be followed to address unresolved safeguarding issues.

All safeguarding concerns, discussions, and actions taken must be reported immediately to the DSL or a Deputy DSL. Staff should provide as much detail as possible, including:

- **A summary of the concern.**
- **Actions taken, including whom they reported it to.**
- **Any follow-up required.**
- **Next steps as advised by the Safeguarding Team.**

Staff must record concerns using secure email and password-protected files, ensuring information is shared safely within the organisation. No information should be shared outside of approved safeguarding procedures.

If at any point there is an immediate risk of serious harm to a child, a referral should be made directly to Children's Social Care or the Police. The DSL should be informed as soon as possible if a direct referral is made.

If a safeguarding concern is not addressed or if a child's situation does not improve, staff must follow escalation procedures:

- **Step 1: Raise the concern with the DSL if a response has not been received or if the child remains at risk.**
- **Step 2: If the issue remains unresolved, escalate to the senior leadership team.**
- **Step 3: If necessary, make a direct referral to Children's Social Care or seek advice from the Local Authority Designated Officer (LADO).**
- **Step 4: If still unresolved, concerns can be raised with the Local Safeguarding Children Partnership.**

Staff should always act in the best interests of the child, ensuring their safety and well-being are prioritised.

For urgent concerns regarding extremism, FGM, or peer-on-peer abuse, specific procedures outlined in this policy should be followed. Staff should also ensure they are aware of reporting pathways for such incidents.

All safeguarding concerns and responses must be securely documented and stored in line with Mind Leads' confidentiality and data protection policies.

---

## **6.E-Safety and Online Learning**

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

To address this, our provision aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupil and staff.
- Protect and educate the whole provision community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole provision community.

- Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

### **6.1 The Four Key Categories of Risk**

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

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

### **6.2 Our Approach to Online Safety**

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

Educate pupils about online safety as part of our curriculum. This includes:

- The safe use of social media, the internet, and technology.
- Keeping personal information private.
- How to recognise unacceptable behaviour online.
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and expectations regarding filtering and monitoring. Refresher training will be provided at least once annually.
- Ensure staff are aware of mobile phone use restrictions, including:

- Personal phones must only be used during non-contact time when pupils are not present.
- Staff must not take pictures or recordings of pupils on personal devices.
- Ensure all staff, pupils, and parents/carers are aware that staff have the power to search pupils' phones, as per DfE guidance on searching, screening, and confiscation.
- Implement robust filtering and monitoring systems to limit children's exposure to the four key risk categories via provision IT systems. We use Draytek systems to provide up-to-date filtering and monitoring.
- Conduct an annual review of our approach to online safety, supported by an annual risk assessment that reflects the risks faced by our provision community.
- Provide regular safeguarding and child protection updates, including online safety, in team meetings and at least annually to all staff.
- Review the child protection and safeguarding policy, including online safety, annually to ensure procedures remain current.
- Store all student records and safeguarding records securely using GSuite and password-protected files.
- Ensure students, staff, and parents receive guidance on the responsible use of social media and the risks associated with it, including online harassment and radicalisation.
- Restrict student access to social networks during provision hours and educate them about their safe and responsible use outside of school.
- Ensure that ICT is used effectively in the curriculum while maintaining safeguards against inappropriate use.
- Monitor and filter all internet activity through our IT support provider, ensuring that inappropriate content is blocked and suspicious activity is flagged.
- Provide Acceptable Use Agreements for staff, students, and parents to outline expected behaviours in the use of technology within our provision.

### **8.3 Artificial Intelligence (AI)**

Generative artificial intelligence (AI) tools are widespread and easily accessible. Staff, pupils, and parents/carers may be familiar with AI-powered chatbots such as ChatGPT and Google Bard.

While AI has many beneficial uses, including enhancing teaching and learning and helping to safeguard pupils, it also presents risks, such as:

- Facilitating abuse (e.g., cyberbullying and grooming).
- Exposing pupils to harmful content.
- The creation of 'deepfakes', where AI generates fake images, audio, or video hoaxes.

Our provision will:

- Treat any AI-related online abuse as a safeguarding concern, subject to this policy and the behaviour policy.
- Require staff to conduct risk assessments before using AI tools for educational purposes.
- Educate students about the risks of AI and how to critically assess AI-generated content.
- **8.4 Sharing of Nudes and Semi-Nudes ('Sexting')**

If you become aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth-produced sexual imagery'), you must report it to the DSL immediately and log the incident securely.

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

You must not:

- View, copy, print, share, store, or save the imagery yourself. If you accidentally view it, report this to the DSL immediately.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) involved to disclose further details regarding the imagery (this is the DSL's responsibility).

- Share information about the incident with other staff, pupils, or parents/carers.
- Blame or shame any young people involved.

### **Curriculum Coverage**

To equip students with knowledge on this issue, our PHSE curriculum includes education on:

- What the sharing of nudes and semi-nudes is.
- How such imagery is commonly encountered.
- Consequences of requesting, forwarding, or providing such images.
- Legal implications of sharing such images.

### **The emotional and reputational impact of such actions.**

Pupils are also taught strategies to manage:

- Requests or pressure to share such images
- The receipt of such images from others.

This section ensures that all aspects of eSafety and online safeguarding are embedded within our wider safeguarding framework, helping to create a safe digital environment for all members of our provision community.

---

## **7. Support for Students and Mental Health Considerations**

At Mind Leads, we specialise in placing the well-being of the young people we work with at the centre of all our approaches. We recognise that traditional education structures do not meet the needs of all students, and we offer bespoke, flexible timetables that include reduced timetables and half-day packages for those who require alternative provisions. This approach ensures that students who struggle with full-time education due to mental health concerns, trauma, or other barriers can still access learning in a way that meets their individual needs.

### **7.1 Trauma-Informed Approaches**

We are committed to adopting trauma-informed practices to create a supportive and nurturing environment for all students. Our approach is strengthened by DSL and Provision Leader, who is undertaking the Relational-Based Practices Training Course delivered by The East Midlands Educational Support Services on developing trauma-informed schools. This training enables us to:

- Understand the impact of trauma on young people's behaviour and emotional well-being.
- Respond appropriately to students experiencing trauma, ensuring they feel safe and supported.
- Foster strong, positive relationships that help students build resilience and self-regulation skills.
- Recognise and address the physiological effects of trauma, ensuring students have access to sensory regulation strategies and safe spaces within the provision.
- Work in partnership with mental health professionals, social workers, and family support teams to provide a multi-agency approach to safeguarding and student well-being.

## **7.2 Early Help and Intervention**

Early intervention is key to preventing long-term difficulties for young people. We provide:

- A holistic approach to identifying students in need of early support, ensuring that concerns are flagged and acted upon as soon as possible.
- Collaborative work with families, external agencies, and professionals to ensure early identification of safeguarding risks and mental health concerns.
- A range of tailored interventions, including one-to-one mentoring, group support sessions, and targeted pastoral care, to support students' emotional well-being and academic progress.
- Regular well-being check-ins, ensuring that students have a trusted adult they can speak to about any concerns they may have.
- Parental engagement strategies to equip families with the knowledge and skills to support their child's emotional well-being at home.

## **7.3 Mental Health First Aid and Signposting Support**

We prioritise mental health awareness and first aid, ensuring that staff are trained to provide appropriate support. This includes:

- Providing students with access to external mental health services, including counselling, therapeutic support, and crisis intervention services through well-established partnerships.
- Embedding mental health and well-being strategies into our daily practice to promote resilience and positive coping mechanisms, including mindfulness activities, stress management techniques, and emotional literacy sessions.
- Developing personalised mental health action plans for students who require additional support.

- Facilitating peer support groups where students can connect with others who may have experienced similar challenges, fostering a sense of belonging and reducing feelings of isolation.

At Mind Leads, our safeguarding approach ensures that all students have access to the support they need to thrive both emotionally and academically. We are committed to ongoing training, collaboration, and innovation to continuously improve the mental health support we offer to young people.

---

## **8. Safer Recruitment and Staff Conduct**

At Mind Leads, we are committed to ensuring the highest standards of safeguarding by recruiting and retaining staff who share our values and dedication to the safety and well-being of young people. Our safer recruitment procedures ensure that all staff and volunteers are suitable to work with children and vulnerable individuals, while our ongoing training and code of conduct reinforce professional expectations.

### **8.1 Pre-Employment Checks**

To ensure the safety of our students, all recruitment processes follow strict safeguarding procedures. This includes:

- Enhanced Disclosure and Barring Service (DBS) checks for all staff and volunteers before employment begins.
- Identity verification to confirm the authenticity of personal details.
- Right to work checks to ensure compliance with employment regulations.
- Professional reference checks, including at least one from a previous employer working with children.
- Verification of qualifications and professional registrations, ensuring all staff hold the appropriate credentials for their role.
- Reviewing employment history and addressing any gaps with appropriate explanation.
- Declaration of any criminal convictions in accordance with the Rehabilitation of Offenders Act 1974.

Any offer of employment is conditional on the satisfactory completion of these checks. Failure to meet these requirements may result in withdrawal of the job offer or termination of employment.

## **8.2 Induction and Ongoing Training**

Safeguarding is at the core of our professional practice, and all staff undergo rigorous induction and continuous professional development to uphold these standards. This includes:

- A mandatory safeguarding induction covering child protection policies, reporting procedures, and staff responsibilities.
- Regular safeguarding training, including updates on Keeping Children Safe in Education (KCSIE) and any changes in local or national safeguarding policies.
- Annual refresher courses to ensure staff remain informed about best practices and emerging safeguarding risks.
- Specialist training for Designated Safeguarding Leads (DSLs) and senior staff to ensure they are equipped to handle complex safeguarding concerns.
- Workshops and briefings on emerging risks such as online safety, exploitation, radicalisation, and trauma-informed approaches.

All staff are required to complete training and demonstrate competency in safeguarding responsibilities to ensure the highest level of care for our students.

## **8.3 Staff Code of Conduct**

All staff at Mind Leads are expected to adhere to a strict code of conduct to maintain professional boundaries and uphold the safeguarding ethos of our organisation. This includes:

- Maintaining appropriate relationships with students, ensuring all interactions remain professional, supportive, and respectful.
- Reporting safeguarding concerns immediately, whether related to a student, colleague, or any other individual within the provision.
- Using technology and social media responsibly, ensuring that communication with students is only conducted via approved channels and in line with safeguarding policies.
- Maintaining confidentiality of student records and safeguarding reports, sharing information only with authorised individuals.
- Following whistleblowing procedures to report any concerns regarding inappropriate behaviour or safeguarding risks.
- Ensuring professional conduct in and out of the provision, as behaviour outside of work may impact professional responsibilities.

Failure to adhere to the staff code of conduct may result in disciplinary action, including dismissal if necessary. Staff are reminded that safeguarding is a collective responsibility, and all concerns should be reported in line with Mind Leads' safeguarding procedures.

By implementing robust safer recruitment, ongoing training, and a strict code of conduct, Mind Leads ensures a safe and supportive environment for all students, staff, and stakeholders.

---

## **9. Children Missing from Education (CME) and Attendance Monitoring**

Ensuring consistent attendance is a crucial part of safeguarding children and young people. Children missing from education (CME) are at significant risk of harm, neglect, exploitation, or becoming victims of crime. Minds Lead is committed to monitoring attendance closely and taking immediate action where concerns arise.

### **9.1 Risks of Persistent Absence**

Persistent absenteeism can be an indicator of broader safeguarding concerns, including:

- Risk of neglect or abuse within the home environment.
- Increased vulnerability to exploitation, including criminal or sexual exploitation.
- Exposure to radicalisation or gang involvement.
- Mental health concerns and social isolation.
- Barriers to learning that may not have been identified or addressed.

To mitigate these risks, Minds Lead takes a proactive approach to monitoring and addressing attendance concerns, ensuring that students remain engaged in education and receive necessary support.

### **9.2 Legal Responsibilities and School Actions**

Schools and alternative provisions have a legal duty to monitor attendance and act promptly when children go missing from education. Our responsibilities include:

- Daily Attendance Monitoring:
  - All students' attendance is recorded and reviewed daily.
  - Parents/carers are contacted on the first day of unexplained absence.
  - Patterns of absence are monitored for early intervention.
- Identifying CME Cases:
  - If a student is absent for more than 10 consecutive school days without authorisation, this will be reported as a potential CME case.
  - Schools must attempt to locate the student through contact with families and known associates.

- Reporting to the Local Authority:
    - If a child is suspected to be missing from education, the case is referred to the Local Authority CME Team.
    - Mind Leads ensures all relevant safeguarding concerns are reported to appropriate agencies.
  - Supporting Families and Students:
    - Early help assessments may be conducted to identify barriers to attendance.
    - Multi-agency support is coordinated for families experiencing challenges in ensuring regular school attendance.
    - Mental health and well-being support are offered to students struggling with attendance due to anxiety, trauma, or other underlying issues.
  - Legal Interventions:
    - Where necessary, legal interventions such as fixed penalty notices or school attendance orders may be considered in line with Department for Education (DfE) guidance.
  - Minds Lead is dedicated to safeguarding students by ensuring that any attendance concerns are identified early and addressed effectively to prevent children from slipping through the gaps in education and care.
- 

## **10. Specific Safeguarding Issues**

Minds Lead is committed to staying up to date with safeguarding trends and adapting our practices accordingly to respond to emerging issues both locally and nationally. Our proactive approach ensures that we remain vigilant to new and evolving risks, equipping staff with the necessary knowledge and training to protect our students effectively.

### **10.1 Domestic Abuse and Operation Encompass**

Domestic abuse has a significant impact on children and young people, affecting their emotional well-being, behaviour, and academic performance. Minds Lead works in partnership with Operation Encompass, a police-led initiative that shares information with schools when a child has been exposed to domestic abuse.

Our responsibilities include:

- Providing immediate support and intervention for affected students.
- Ensuring staff are trained to recognise signs of domestic abuse.
- Referring families to appropriate external support services.

### **10.2 Female Genital Mutilation (FGM)**

FGM is a criminal offence in the UK and a serious form of child abuse with long-lasting consequences. There is a mandatory duty for teachers to report any cases where FGM appears to have been carried out on a girl under 18.

Minds Lead's approach to FGM safeguarding includes:

- Raising awareness through staff training and student education.
- Reporting any concerns immediately to the DSL, who will liaise with social services and the police.
- Supporting at-risk students through confidential pastoral care and multi-agency work.

### **10.3 Forced Marriage**

Forced marriage is illegal in the UK and a form of abuse that violates human rights. It is important to distinguish between arranged marriage (where both parties consent) and forced marriage (where consent is absent due to coercion or threats).

Key actions include:

- Identifying and supporting students at risk of forced marriage.
- Reporting concerns to the DSL and social services immediately.
- Educating students about their rights and available support services.

### **10.4 Radicalisation and Prevent Duty**

Under the Prevent Duty, Minds Lead is committed to protecting students from being drawn into extremism and radicalisation.

Our safeguarding approach includes:

- Training staff to recognise signs of radicalisation.
- Promoting critical thinking and resilience to extremist narratives through our curriculum.
- Referring concerns to the Local Authority Prevent Team or Channel Programme for early intervention.
- Providing PHSE lessons on extremism and radicalisation, equipping students with the skills to challenge extremist ideologies.

### **10.5 County Lines and Criminal Exploitation**

County Lines refers to the exploitation of young people by criminal networks to transport and distribute drugs. Victims are often coerced, threatened, or manipulated.

Minds Lead takes the following steps:

- Training staff to identify signs of exploitation, such as sudden absences, possession of large sums of money, or associating with unknown adults.
- Reporting concerns promptly to the DSL and safeguarding authorities.

- Providing tailored support to affected students, including working with the police and youth services.
- Delivering PHSE lessons on County Lines to raise student awareness about the risks, warning signs, and protective strategies.

### **10.6 Modern Slavery and Human Trafficking**

Modern slavery includes forced labour, domestic servitude, and human trafficking, affecting both UK and international victims. Children may be forced to work in unsafe conditions, exploited for financial gain, or trafficked across regions.

Minds Lead's role includes:

- Raising awareness among staff and students about the dangers of human trafficking.
- Identifying vulnerable students who may be at risk of exploitation.
- Working with external safeguarding agencies to intervene and protect victims.

### **10.7 Peer-on-Peer Abuse**

Peer-on-peer abuse, including bullying, sexual harassment, and physical violence, can have serious consequences for young people.

Minds Lead takes a zero-tolerance approach by:

- Providing clear reporting mechanisms for students experiencing peer-on-peer abuse.
- Training staff to recognise and respond to incidents promptly.
- Implementing restorative practices and support interventions to address issues effectively. Peer-on-peer abuse, including bullying, sexual harassment, and physical violence, can have serious consequences for young people.

**Minds Lead takes a zero-tolerance approach by:**

- Providing clear reporting mechanisms for students experiencing peer-on-peer abuse.
- Training staff to recognise and respond to incidents promptly.
- Implementing restorative practices and support interventions to address issues effectively.

By embedding awareness of these specific safeguarding issues into our policies and staff training, Minds Lead ensures that all students receive the protection and support they need.

## **11. Managing and Supporting Safeguarding Cases**

Minds Lead is committed to being an inclusive and supportive environment for all students, particularly those in vulnerable circumstances. We recognise that some students may require additional support due to their life experiences, legal status, or safeguarding concerns. Our provision ensures that every young person has access to the right interventions, pastoral care, and multi-agency support to safeguard their well-being and academic success.

### **11.1 Children in Care (Looked After Children - LAC)**

Definition: Children in Care (LAC) are young people who have been taken into the care of the local authority due to concerns about their safety, welfare, or family circumstances. This may include children living in foster care, residential homes, or under special guardianship arrangements.

#### **How Minds Lead Supports LAC Students:**

- A Designated Teacher for LAC ensures personalised support and close collaboration with the Virtual School.
- We provide tailored academic and pastoral interventions to support students' emotional well-being and learning progress.
- Regular Personal Education Plan (PEP) meetings are held to track educational progress and identify any additional support needs.
- We work closely with social workers, foster carers, and external agencies to ensure a coordinated approach to the child's care and education.
- Priority access to mental health and well-being services, ensuring looked-after children receive emotional and therapeutic support as needed.

#### **11.2 Child Protection**

Definition: A child is subject to a Child Protection Plan (CPP) when there is reasonable cause to believe they are suffering, or are likely to suffer, significant harm due to abuse, neglect, or other safeguarding concerns. Child protection interventions aim to ensure a child's immediate safety and long-term well-being.

#### **How Minds Lead Supports Children on a Child Protection Plan:**

- DSL (Designated Safeguarding Lead) and team attend all case conferences, core group meetings, and child protection reviews.
- Enhanced monitoring and support to ensure the child's safety and engagement in education.
- Working closely with social services, police, and health professionals to ensure a multi-agency safeguarding approach.
- Early intervention and pastoral care to address trauma and emotional needs.
- Robust risk assessments to ensure school-based and external risks are mitigated effectively.

#### **11.3 Children in Need (CIN)**

Definition: A Child in Need (CIN) is a child who requires additional services from the local authority to maintain their health and development. This may be due to disabilities, family difficulties, or concerns that do not meet the threshold for child protection intervention.

#### **How Minds Lead Supports Children in Need:**

- Close collaboration with family support services to ensure children receive additional help as needed.

- Flexible learning plans and alternative timetables to accommodate students' individual needs and circumstances.
- Access to in-school mentoring and pastoral care to promote well-being and resilience.
- Regular multi-agency meetings to review progress and identify any additional safeguarding concerns.
- Early Help referrals where additional intervention is required to prevent escalation to child protection.

#### **11.4 The Difference Between Child Protection and Child in Need**

Understanding the distinction between Child Protection and Child in Need is crucial in providing the right support:

- **Child Protection (CP)** – Involves cases where there is a risk of significant harm due to abuse or neglect, requiring statutory intervention.
- **Child in Need (CIN)** – Involves cases where extra support is required but there is no immediate risk of significant harm.

Minds Lead ensures that both groups receive appropriate interventions, referrals, and safeguarding measures to promote their safety and well-being.

## **12. Policy Review and Monitoring**

Minds Lead is committed to regularly reviewing and updating our safeguarding policies to ensure they remain effective, compliant with statutory guidance, and responsive to emerging risks. Our safeguarding policy is subject to continuous monitoring and evaluation to maintain the highest standards of child protection.

### **12.1 Annual Safeguarding Audits**

- Minds Lead conducts comprehensive annual safeguarding audits to assess the effectiveness of our safeguarding procedures.
- Audits include reviews of safeguarding records, reporting mechanisms, staff compliance, and intervention strategies.
- Findings from these audits inform action plans for continuous improvement and are shared with senior leadership and external safeguarding partners where appropriate.

### **12.2 Staff Training Compliance Tracking**

- We ensure that all staff receive mandatory safeguarding training as part of their induction and through regular refresher courses.
- A centralised tracking system monitors staff training completion, ensuring all team members remain up to date with the latest safeguarding guidance.
- Additional specialist training is provided for Designated Safeguarding Leads (DSLs) and staff in high-risk roles.

- Non-compliance with safeguarding training requirements is escalated to leadership to ensure full compliance.

### **12.3 Policy Updates and Changes**

- Our safeguarding policy is reviewed annually or sooner if there are significant changes in legislation or local/national safeguarding priorities.
- Updates are informed by DfE guidance, local authority safeguarding teams, and feedback from staff, students, and external safeguarding agencies.
- All staff are informed of policy updates and required to confirm their understanding and adherence.
- A structured policy review process ensures that safeguarding procedures remain robust, effective, and aligned with best practices.

By embedding regular review and monitoring into our safeguarding framework, Minds Lead ensures that our approach to child protection is proactive, evidence-based, and continuously improving.

## **13. Allegations Management**

Minds Lead is committed to responding to concerns or allegations about adults working with children promptly, fairly, and in a way that prioritises the safety and welfare of pupils. This applies to staff, volunteers, contractors, and visitors.

### **13.1 When a concern becomes an allegation**

This procedure must be followed where an adult may have:

- Harmed a child or may have harmed a child
- Committed a criminal offence against or related to a child
- Behaved in a way that indicates they may pose a risk of harm to children
- Behaved in a way that indicates they may not be suitable to work with children

Concerns may relate to conduct in or out of the provision, including online.

### **13.2 Reporting routes**

All concerns or allegations must be reported immediately and not investigated by the person receiving the information.

- Concern about staff, volunteer, contractor, visitor: report to the DSL and Provision Lead
- Concern about the DSL: report to the Provision Lead
- Concern about the Provision Lead: report to the DSL
- Concern about both: report to the safeguarding governance lead or Chair of Trustees and contact the LADO for advice

If a child is at immediate risk of serious harm, contact Police and or Children's Social Care without delay, then inform the DSL as soon as possible.

### **13.3 Immediate action and LADO liaison**

The DSL and or Provision Lead will complete an immediate safeguarding risk assessment and take proportionate action to protect children. This may include increased supervision, changes to duties, or removing the adult from contact with children. Suspension will only be considered where necessary and is a neutral act.

Where the threshold is met, the DSL or Provision Lead will contact the Local Authority Designated Officer (LADO) as soon as possible and within one working day, and will follow agreed next steps with Police and or Children's Social Care where required.

#### **13.4 Low level concerns**

Low level concerns are behaviours that do not meet the allegation threshold but are inconsistent with the Staff Code of Conduct. These must be reported to the DSL or Provision Lead, recorded, reviewed for patterns, and addressed through supervision, training, and clear expectations. Any low level concern that indicates a child may be at risk must be escalated and treated as an allegation.

#### **13.5 Recording, confidentiality and outcomes**

All concerns and allegations will be recorded securely, shared on a strict need to know basis, and managed in line with data protection. Outcomes will be recorded in line with statutory guidance.

Where an adult is removed from regulated activity, resigns, or would have been removed due to risk of harm, a referral will be made to the DBS and where appropriate the Teaching Regulation Agency.

#### **13.6 Support and escalation**

Minds Lead will provide appropriate support to pupils and staff during any process. Staff must use whistleblowing routes if they believe concerns are not being managed appropriately, including escalation to governance or seeking advice from the LADO.







