

SAFEGUARDING, CHILD PROTECTION and PROMOTING the WELFARE of CHILDREN POLICY

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Policies are generated and reviewed with an awareness of the important role of equity and inclusion as a driver for the work of The Regulation Station, and in relation to students, staff and visitors. We consistently hold these values along with our safeguarding responsibility at the heart of all that we do. We are committed to safeguarding and child protection in line with the statutory guidance. As required, all staff have read and understood part one of 'Keeping Children Safe in Education' (2025).

Local Multi Agency Safeguarding Arrangement

The Children and Social Work Act 2017 (the Act) replaces Local Safeguarding Children Boards with the new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police and clinical commissioning groups.) The Act places a duty on those partners to make arrangements for themselves and relevant agencies they deem appropriate, to work together for the purpose of safeguarding and promoting the welfare of children in their area. Education is one of the relevant agencies. In Luton, the arrangements continue to be referred to as the Local Safeguarding Children and Adult's Board.

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1. Contact Details

Role	Name	Contact details
Designated Safeguarding Lead	Janee Ryan	01582798420 safeguarding@theregulationstation.org
Designated Safeguarding Lead	Claire Moore	safeguarding@theregulationstation.org
Director - Safeguarding and Child Protection	Jackie Brooks	safeguarding@theregulationstation.org
The Prevent SPOC:		safeguarding@theregulationstation.org
Operation Encompass SPOC:		safeguarding@theregulationstation.org
Children Looked After and Previously Looked After Designated Teacher	Janee Ryan	safeguarding@theregulationstation.org
LA Safeguarding in Education Manager	Ella Sealy (Luton Borough Council) Maggie Lloyd (Education Safeguarding Lead)	01582 548984 0300 300 5115.
LA Child Protection Contact/LADO	Paul James	LADO@luton.gov.uk 01582 548069 LADO@centralbedfordshire.gov.uk
MASH - (Multi-agency Safeguarding Hub)	Luton Central Bedfordshire	mash@luton.gov.uk 01582 547653 cs.accessandreferral@centralbedfordshire.gov.uk 0300 300 8585
Emergency Duty Team (Children's Social care)	Luton Central Bedfordshire	01582 405109 0300 300 8123
Luton Safeguarding Children Board Central Bedfordshire Safeguarding Children Board		lutonlscb.org.uk

2. Policy Statement and Principles

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who encounters children and their families and carers have a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Working Together to Safeguard Children 2018 (page 6) – "a child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout"

At The Regulation Station, Janee Ryan is the Designated Safeguarding Lead, Jackie Brooks is the Director with oversight of Safeguarding. The DSL is supported by two other colleagues that have been fully trained to support students in our provision with safeguarding matters.

There are a variety of statutory policies that link to this policy including: Staff Code of Conduct, Safer Recruitment policy, allegations against staff, complaints, behaviour, children missing in education and on-line safety.

This Safeguarding Policy will be reviewed by the Designated Safeguarding Lead on a regular basis to ensure it remains current and incorporates all revisions made to local or national safeguarding guidance. This policy will be reviewed as a minimum once a year and provided to the Directors for approval and sign off.

Our policy applies to all staff, governors, volunteers and visitors working in the provision and takes into account statutory guidance provided by the Department for Education and local guidance issued by the Local Children Safeguarding Board.

We will ensure that all parents/carers are made aware of our responsibilities regarding child protection procedures and of how we will safeguard and promote the welfare of their children through the publication of the safeguarding policy.

These duties and responsibilities, as set out within the Education Act 2002 sec175 and 157, DfE Statutory Guidance Keeping Children Safe in Education 2025 and HM Working Together to Safeguard Children 2018 are incorporated into this policy.

3. Child Protection and Safeguarding Statement

At The Regulation Station, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We will endeavour to provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse neglect and exploitation and follow our procedures to ensure that children receive effective support, protection, and justice.

The procedures contained in this policy apply to all staff, volunteers, governors and staff of The Regulation Station and are consistent with those of Local Authority Safeguarding Partnerships.

Safeguarding children is defined as:

The actions we take to promote the welfare of children and protect them from harm. Everyone who comes into contact with children and families has a role to play.

Safeguarding and promoting the welfare of children is defined as:

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

Safeguarding is not just about protecting children from deliberate harm. It also relates to the broader aspects of care and education including:

- Students' health and safety and emotional well-being, and their mental and physical health or development.
- Meeting the needs of children with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits and off- site education.
- Intimate care and emotional wellbeing.
- On-line safety and associated issues.
- Appropriate arrangements to ensure student security, taking into account the local context.
- Keeping children safe from risks, harm and exploitation: KCSIE 2025 Annex A.

Safeguarding can involve a range of potential issues such as:

- Neglect, physical abuse, sexual abuse, emotional abuse and exploitation.
- Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying).
- child on child abuse (section 13 KCSIE 2025)
- Racist, disability- based, homophobic, bi-phobic or transphobic abuse.
- Gender based violence/violence against women and girls.
- Extremist behaviour and/or radicalisation.
- Child sexual exploitation, human trafficking, modern slavery or exploitation.
- The impact of new technologies, including 'sexting' and accessing pornography.
- Child on Child Sexual Violence and Sexual Harassment (defined in KCSIE 2025)
- Issues which may be specific to a local area or population, for example gang activity, knife crime, youth violence, criminal child exploitation (CCE) and County Lines.
- Family circumstances which present challenges for the child, such as drug and alcohol misuse, adult mental health issues.
- Risk of serious violence and violent crime (KCSIE 2025 paragraphs 31 and 32).
- Particular issues affecting children including domestic abuse and violence, female genital mutilation and honour-based abuse and forced marriage.
- 'Upskirting'- The Voyeurism (Offences) Act, which is commonly known as The

Upskirting Act, came into force on 12th April 2019. Upskirting is a criminal offence and reportable by all teachers (KCSIE 2025).

The Regulation Station demonstrates that the effective safeguarding of children can only be achieved by putting children at the centre of a system where we listen and hear what they say. Every individual within our provision will play their part, including working with professionals from other agencies, to meet the needs of our most vulnerable children and keep them safe. We will take opportunities to teach children about important safeguarding issues in a way that is age appropriate. We always put students at the centre of our safeguarding arrangements and listen carefully to the children, ensuring we hear their voices. Directors should ensure they facilitate a whole provision approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. (Paragraph 82 KCSIE 2025).

The Regulation Station will ensure where there is a safeguarding concern the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. (Paragraph 83 KCSIE 2025)

Our provision is led by senior members of staff whose aims are to provide a safe environment and vigilant culture where children and young people can learn and be safeguarded. If there are safeguarding concerns, we will respond with appropriate action in a timely manner for those children who may need help or who may be suffering, or likely to suffer, significant harm.

Where staff members have concerns about a child (as opposed to a child being in immediate danger) they will decide what action to take in conjunction with the Designated Safeguarding Lead (DSL). Although we advocate that any staff can make a referral to children's social care, especially where a child is identified as being in immediate danger, they should however ensure that the DSL or DDSLs are informed as soon as possible and subsequently record all factual information.

We also ensure that all our staff are clear that whilst they should discuss and agree with the DSL/DDSLs any actions to be taken, they are able to escalate their concerns and contact social care to seek support for the child if, despite the discussion with the DSL/DDSLs, their concerns remain. Staff are also informed of the provision whistle blowing procedures and the contact details for the Local Authority LADO and NSPCC helpline.

Our rigorous induction programme covers all aspects of safeguarding procedures. Staff and volunteers receive appropriate safeguarding information during inductions and refreshers on a regular basis.

The Designated Safeguarding Lead (DSL) and DDSLs, who are familiar with national and local guidance, will share concerns, where appropriate, with the relevant agencies.

4. Our Safeguarding Policy

There are six main elements to our policy:

- Providing a safe environment in which children can learn and develop.
- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children.
- Implementing procedures for identifying and reporting cases, or suspected cases of abuse.
- Supporting students who have been abused or harmed in accordance with his/her child protection plan.
- Raising awareness of how to safeguard children, child protection processes and equipping children with the skills needed to keep themselves safe.
- Working in partnership with agencies and safeguarding partners in the 'best interest of the child'.

We recognise that because of the day-to-day contact with children, staff are well placed to observe the outward signs of abuse.

The provision will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to and heard.
- Ensure children know that there are trusted adults in the provision who they can approach if they are worried.
- Ensure that every effort is made to establish effective working relationships with parents, carers and colleagues from other agencies.
- Include opportunities in the PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse by:
 - Recognising and managing risks including online, sexual exploitation, sexting and running away, as well as radicalisation.
 - Developing healthy relationships and awareness of domestic violence, and abuse which is linked to 'honour' such as female genital mutilation and forced marriage, bullying and peer on peer abuse.
 - Recognising how pressure from others can affect their behaviour.
 - Knowing that as a provision we will act swiftly to address any concerns related to serious violence, gang and knife crime or child on child sexual violence or sexual harassment incidents.

The Regulation Station supports the development of academic, social and emotional skills. We will:

- Take all reasonable measures to ensure any risk of harm to children's welfare is minimised.
- Take all appropriate actions to address concerns about the welfare of a child, working to local policies and procedures in full working partnership with agencies.
- Ensure robust child protection arrangements are in place and embedded in the daily life and practice of the provision.

- Promote student health and safety.
- Promote safe practice, and challenge unsafe practice.
- Ensure that procedures are in place to deal with allegations of abuse against teachers and other staff including volunteers, and the local multi-agency procedures.
- Provide first aid and meet the health needs of children with medical conditions
- Ensure provision site security.
- Address drugs and substance misuse issues.
- Work with all agencies regarding missing children, anti-social behaviour/gang activity and violence in the community/knife crime and children at risk of sexual exploitation.

We will follow the procedures set out by the Local Safeguarding Children Board and take account of guidance issued by the DfE in Keeping Children Safe in Education 2025 to:

- Ensure we have a Designated Safeguarding Lead
- The Designated Safeguarding Lead role is written into C. Moore's and J Ryan's job description and clarifies the role and responsibilities included (as defined in KCSiE 2025 Annex B).
- Ensure we have a nominated director responsible for child protection/safeguarding.
- Ensure that we have a Designated Teacher for Children Looked After
- Ensure every member of staff (including temporary staff and volunteers) and the Directors know the name of the Designated Safeguarding Lead and the Safeguarding Team responsible for child protection, and that posters displaying the structure are placed around the provision, in visitor packs and on the provision website.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead, DDSL or to children's social care/police if a child is in immediate danger. All staff sign that they have read KCSiE part 1 and this is also part of induction training.
- Ensure all staff and volunteers are aware of the early help process and understand their role in making referrals or contributing to early help offers and arrangements.
- Ensure that there is a whistleblowing policy and culture where staff can raise concerns about unsafe practice, and that these concerns will be taken seriously.
- Ensure that there is a complaints system in place for children and families.
- Ensure that parents understand the responsibility placed on the provision and staff for child protection and safeguarding by setting out its obligations in the provision prospectus and on the provision's website.
- Notify Children's Social Care if there is an unexplained absence for a child who is subject to a child protection plan and where no contact can be established with the child or a parent or appropriate adult linked to the child.
- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at child protection conferences.
- Keep records of concerns about children, even where there is no need to refer the matter immediately; documenting and collating information on individual children to

support early identification, referral and actions to safeguard.

- Ensure that we follow robust processes to respond when children who are absent for prolonged periods of time and or repeated occasions
- Follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.
- Apply confidentiality appropriately.
- Apply the Luton/Central Bedfordshire Safeguarding Children Board escalation procedures if there are any concerns about the actions or inaction of social care staff or staff from other agencies.

5. Supporting children

We recognise that children who are abused or who witness violence may find it difficult to develop a positive sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The provision may be the only stable, secure and predictable element in the lives of children at risk. When at provision their behaviour may be challenging and defiant or they may be withdrawn. We also recognise that there are children who are more vulnerable than others, which include children with special educational needs and or disabilities.

Our provision will endeavour to support the student through:

- Developing the content of the curriculum by ensuring that we meet the needs of the PSHE curriculum 2020, whilst also being proactive to local concerns and adapting our curriculum to deliver emergency student briefings as and where appropriate.
- Maintaining an ethos which promotes a positive, supportive and secure environment, and which gives students a sense of them being valued.
- The behaviour policy and anti-bullying policy which is kept up to date with national and local guidance and which is aimed at supporting vulnerable students in our provision.
- We will proactively ensure that all children know that some behaviours are unacceptable and will need to be addressed, but as members of our community they are valued and will be supported through the time required to deal with any abuse or harm that has occurred, or outcomes from incidents.
- In our provision we run a system based on restorative justice, staff work closely with students to discuss behaviour incidents including what went wrong, how everyone is feeling and what actions are required to repair relationships. Our team offer support to students who need additional support in managing their emotions.
- Liaison with other agencies that support the student such as Children's Social Care (in line with the Threshold Document), Behaviour Support Service and Education Psychology Service and Early Help Assessment (EHA), etc.
- Ensuring that, where a student leaves and is subject to a child protection plan, child in need plan or where there have been wider safeguarding concerns, their information is transferred to the new provision immediately and that the child's social worker is informed.
- Ensuring that the vulnerability of children with special educational needs and or disabilities is recognised and fully supported by our Learning Support Assistants and Pastoral Team.

6. Safe Staff and Supporting Staff

- The leadership team of the provision will ensure that all safer working practices and recruitment procedures are followed in accordance with the guidance set out in KCSIE 2025 Part Three.

- All staff will be appropriately trained in safer working practices and Provision leaders and Directors will access the safer recruitment training.
- Statutory pre-employment checks and references from previous employers are an essential part of the recruitment process. We will ensure we adopt the appropriate necessary procedures to carry out the checks required and where any concerns arise we will seek advice and act in accordance with national guidance.
- The provision has in place recruitment, selection and vetting procedures in accordance with KCSIE 2025 Part Three and maintains a Single Central Record (SCR), which is reviewed regularly and updated in accordance with KCSIE 2025 Part Three paragraphs 164 to 171.
- Staff will have access to advice on the boundaries of appropriate behaviour and will be aware of the Employee Code of Conduct, which includes contact between staff and students outside the work context. There is also the Low-Level Concerns policy which provides clarity for staff.
- Newly appointed staff will receive Safeguarding training, including appropriate behaviours and setting boundaries.
- In the event of any complaint or allegation against a member of staff, the Head of Provision (or Managing Director) if the Head of Provision is not present, will be notified immediately. If it relates to the Head of Provision, the Managing Director will be informed without delay. We will respond to all allegations robustly and appropriately in collaboration with the Local Authority Designated Officer (LADO).
- All new employees will be appropriately inducted to their role.

7. Roles and Responsibilities

The Department for Education has provided key documents which offer clear and detailed information about the role and responsibilities of schools, governors and provision staff with regards to the safeguarding of children and young people; some of the documents are as follows:

Keeping children safe in education – Statutory guidance for schools and colleges (September 2025)
(https://assets.publishing.service.gov.uk/media/68b02d1efef950b0909c1734/Keeping_children_safe_in_education_2025_part_one_Information_for_school_college_staff.pdf)

Note: all staff working directly with children must have read part 1 – Statutory guidance for schools and colleges (September 2025). The provision will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of the guidance.

- What to do if you're worried a child is being abused – Advice for practitioners (March 2015)
(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
- Working together to safeguard children – A guide to inter-agency working to safeguard and promote the welfare of children (July 2018)
(<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>)

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone in our provision who comes into contact with children and their families has a role to play in safeguarding children. All staff in our provision consider, at all times, what is in the best interests of children. Staff in the provision hold a variety of roles that contribute to keeping children safe, and are aware of how to raise concerns.

All staff within our provision are important as they are in a position to identify concerns early and provide help to children to prevent concerns from escalating. All staff contribute to providing a safe environment in which children can learn by contributing to a bigger picture in reporting all of their concerns regardless of how minor/ insignificant they may seem at the time. This is embedded into the culture of the provision and all staff understand the importance of their contribution in keeping all of our children safe.

The provision recognises the importance of children and social workers meeting during the provision day where required and we have a robust Safeguarding Team to work with social care and safeguarding partners to ensure children subject to child protection, child in need and CLA plans are kept safe and the child's needs are met at any time of the day. DDSLs are on call during the provision holidays.

We understand that children who need a social worker due to safeguarding or welfare needs, are potentially at greater risk of harm, we work very closely with all external agencies to address safeguarding and child protection concerns in this area.

We do recognise how a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educational disadvantage in facing barriers to attendance, learning, behaviour and mental health. We sign post children, parents and carers to for support, in provision and through posters around the provision.

8. Safeguarding Training

All staff must now receive safeguarding and child protection training, including online safety, with explicit reference to filtering and monitoring responsibilities. Training must be refreshed regularly, with updates at least annually.

The provision is registered with a digital training portal where staff complete elements of Safeguarding Training including statutory safeguarding CPD. In addition to this training, all staff members receive child protection and safeguarding updates when required, but at least annually.

All our staff are aware of systems within the provision, and these are explained to them as part of staff induction, which include our Safeguarding Training, the employee code of conduct, prevent training and reading Keeping Children Safe in Education 2025 part 1 and Part 5.

Our provision utilises an induction checklist when staff are inducted which includes the above, but also other policy and procedural information.

LSCB provides DSL training and staff are kept up to date with any local or national changes to safeguarding guidance via our DSLs.

All our staff know what to do if a child is raising concerns or makes a disclosure of abuse neglect and/or exploitation. Staff will maintain a level of confidentiality whilst liaising with the Designated Safeguarding Lead, DDSL and children's social care if necessary. Our staff will never promise a child that they will not tell anyone about a disclosure or allegation, recognising this may not be in the best interest of the child.

9. Provision's filtering and monitoring systems for IT.

The DSL is expected to take lead responsibility for this.

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

All staff should receive appropriate safeguarding and child protection training which now includes an understanding of expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

Governing bodies and proprietors should receive safeguarding training which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

Paragraph 141 of the guidance now states the following:

'Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.'

10. Staff responsibilities

Senior Leadership responsibilities:

- Contribute to inter-agency working in line with HM Working Together to Safeguard Children 2018 guidance.
- Provide a co-ordinated offer of early help when additional needs of children are identified.
- Ensure all staff, supply staff and volunteers are alert to the definitions of abuse and indicators (KCSIE 2025 paragraphs 19 to 28), and through access to regular training opportunities and updates and through mandatory staff reading of KCSiE, part 1 and part 5.
- Ensure staff are alert to the various factors that can increase the need for early help (KCSIE 2025 paragraph 18).
- Working with Children's Social Care, support their assessment and planning processes including the provision's attendance at conference and core group meetings as appropriate.
- Carry out tasks delegated by the Directors such as training of staff, safer recruitment and maintaining a single central register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the provision including agencies working on provision premises.

- Treat any information shared by staff or students with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE KCSIE 2025 Part Four 'Allegations of abuse made against teachers, and other staff, including supply teachers and volunteers').
- KCSIE 2025 Part Four 'Allegations of Abuse made against teachers including supply teachers, other staff and volunteers and contractors', paragraph 211: Includes behaviours which covers where an individual has behaved or may have behaved in a way that indicates they may not be suitable to work with children. The reason is because of transferrable risk. Where a member of staff or volunteer is involved in an incident outside of provision/college which did not involve children but could have an impact on their suitability to work with children.

Teachers (including ECT's) and Headteachers – Professional Duty

- The Teachers Standards 2012 remind us that teachers, newly qualified teachers and headteachers should safeguard children and maintain public trust in the teaching profession as part of our professional duties.
- The Children and Social Work Act of 2017, places responsibilities for designated teachers to have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- Care leavers are treated exactly the same as other children who are currently looked after. The designated CLA teacher will work with them as a mentor and support them throughout their time in the provision.

11. Designated Safeguarding Lead

- We have a Designated Safeguarding Lead who takes lead responsibility for safeguarding children and child protection who has received appropriate training and support for this role. The Designated Safeguarding Lead is a senior member of the provision leadership team, and their responsibilities are explicit in their job description.
- We also have 2 Deputy Designated Safeguarding Leads, who will provide cover for the Designated Safeguarding Lead when they are not available. They will provide additional support to ensure the responsibilities for child protection and safeguarding children are fully embedded within the provision ethos and that specific duties are discharged. They will assist the Designated Safeguarding Lead in managing referrals, attending Child Protection Conferences, reviews and meetings and supporting the child/children.
- We acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding students. Our Designated Safeguarding Lead will ensure there is a structured procedure within the provision, which will be followed by all of the members of the provision community in cases of suspected abuse.

The Designated Safeguarding Lead is expected to:

Manage Referrals

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Support staff who make referrals to children's social care and other referral pathways.
- Refer cases where a person is dismissed or left due to risk/harm to a child and the DBS as required.

The Safeguarding Team meet on a weekly basis to review our current vulnerable students. This ensures that everyone is fully informed and able to respond to the needs of children subject to safeguarding concerns.

Where students are identified as vulnerable or have safeguarding concerns, they are allocated a safeguarding key worker who will be their point of contact in provision and will liaise with home and external agencies. This person will engage with the student in provision and give the student confidence in speaking about their issues as they know that the keyworker is aware of all situations, allowing trust to be built and an openness to share information.

Work with others

- Liaise with the Head of Provision to inform him/her of any issues and ongoing investigations.
- As required, liaise with the 'case manager' (as per Part Four of KCSIE 2025) and the LADO where there are child protection concerns/allegations that relate to a member of staff.
- Liaise with the case manager and the LADO/ LADO Allegation Officer where there are concerns about a staff member.
- Liaise with staff on matters of safety and safeguarding and deciding when to make a referral by liaising with other agencies and acts as a source of support, advice and expertise for other staff.
- Take part in strategy discussions or attend inter-agency meetings and/or support other staff to do so and to contribute to the assessment of children.
- Liaise with the local authority and other agencies in line with HM Working Together to Safeguard Children 2018 and the Luton/Central Bedfordshire Safeguarding Children Board procedures and practice guidance.

Undertake training

- Formal Designated Safeguarding Lead training will be undertaken every two years. Informal training and updating of knowledge and skills will be at regular intervals, undertaken at least annually. The Designated Safeguarding Lead is responsible for their own training and should obtain access to resources or any relevant refresher training.
- The Designated Safeguarding Lead is also responsible for ensuring all other staff with designated safeguarding responsibilities access up to date and timely safeguarding training and maintains a register or data base to evidence the training.

The training undertaken should enable the Designated Safeguarding Lead to:

- Understand the assessment process for providing early help and intervention
- Have a working knowledge of how the Luton/Central Bedfordshire Safeguarding Children Boards operate, the conduct of a child protection conference, and be able to attend and contribute to these effectively when required to do so.
- Ensure that each member of staff has access to the child protection policy and procedures.
- Be alert to the specific needs of children in need, including those with special educational needs and or disabilities and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Understand the Prevent Duty and provide advice and support to staff on protecting and preventing children from the risk of radicalisation and being grooming into extremist behaviours and attitudes (KCSIE 2025 Annex A pages 89 to 91).

- Understand the reporting requirements for FGM.
- Understand and support children to keep safe when online and when they are learning at home. (KCSIE 2025 Paragraph 92 and Annex C).
- Encourage a culture of protecting children, listening to children and their wishes and feelings.

Raise awareness

- Ensure that the child protection policies are known, understood and used appropriately.
- Ensure that the safeguarding policy is reviewed annually in consultation with staff members, and procedures are updated and reviewed regularly and implemented, and that Directors are kept up to date and actively involved.
- Work strategically to ensure policies and procedures are up to date and drive and support development work within the provision.
- Ensure that the safeguarding policy is available to parents and carers and uploaded to the provision's website and make parents/carers aware that referrals may be made about suspected abuse, neglect or exploitation.
- Ensure all staff receive induction training covering child protection before working with children and can recognise and report any concerns immediately as they arise.

Availability

- During term time the Designated Safeguarding Lead (or the Deputy) will always be available (during provision hours) for staff in the provision to discuss any safeguarding concerns. Appropriate arrangements will also need to be in place for any out of provision hours' activities in line with the guidance contained in DfE KCSIE 2025 paragraphs 45 and 46, 67 to 73, and Annex B

Head of Provision

The Head of the provision will ensure that:

- The policies and procedures adopted by the governing body are fully implemented and followed by all staff.
- The provision has an up-to-date Single Central Record (SCR) which is reviewed regularly and is compliant with statutory guidance.
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and inter-agency meetings, contributing to the assessment of children and receive supportive supervision.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.
- The Head of Provision will ensure all staff and volunteers have access to and read and understand the requirements placed on them through: - the Safeguarding, Child Protection and Promoting the Welfare of Children policy.
- The Head of Provision will ensure there are mechanisms in place to assist staff to fully understand and discharge their role and responsibilities as set out in KCSIE 2025.
- Where there is an allegation made against a member of staff (either paid or unpaid) that meets the criteria for a referral to the LADO, then the Head of Provision will discuss the allegation immediately with the LADO (within 24 hours) and ensure that cases are managed as per Part Four of KCSiE (2025). If the allegation is against the Head of Provision, then LADO will manage the allegation
- Where a teacher's employer, including an agency, dismisses or ceases to use the

services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

12. Children Looked After

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

- Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL/DDSLs have details of children's social workers and relevant virtual provision heads.
- We have appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL/DDSL to ensure that any safeguarding concerns regarding children looked-after and previously looked-after are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of children looked-after and children previously looked-after, including discussing with the home school how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

13. Identifying Concerns

All members of staff and Directors will know how to identify students who may be being harmed and then how to respond to a student who discloses abuse, or where others raise concerns about them. Our staff are familiar with procedures to be followed. Staff must be particularly alert to safeguarding concerns arising from children being absent from education on repeat occasions and/or for prolonged periods.

Some of the following signs might be indicators of abuse, neglect or exploitation:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed.
- Children with clothes which are ill-fitting and/or dirty.
- Children with consistently poor hygiene.
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason.
- Children who don't want to change clothes in front of others or participate in physical activities.
- Children who are having problems at provision, for example, a sudden lack of concentration and learning or they appear to be tired and hungry.
- Children who talk about being left home alone, with inappropriate carers or with strangers.
- Children who reach developmental milestones, such as learning to speak or walk, late,

with no medical reason.

- Children who are regularly missing from school or education.
- Children who are reluctant to go home after provision.
- Children with poor school attendance and punctuality, or who are consistently late being picked up.
- Parents who are dismissive and non-responsive to practitioners' concerns.
- Parents who collect their children from provision when drunk, or under the influence of drugs, are influenced by gangs and drug and knife crime.
- Children who have limited or no support or supervision when online and or using social media sites outside of their understanding or age limits.
- Children who drink alcohol regularly from an early age.
- Children who are concerned for younger siblings without explaining why.
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.
- Children with mental or physical health issues or needs.
- Children or young people with 'carer responsibilities beyond their age or limitations.'
- Children who are persistently late to provision lacking equipment.
- Children who suddenly have new things and money

Our staff will be familiar with procedures to be followed regardless of their role in provision. Staff should recognise that mental health problems may indicate abuse or neglect. While staff should not diagnose conditions, they must be alert to changes in behaviour and wellbeing, and act in line with safeguarding policy if concerns arise.

14. Categories of Abuse

All The Regulation Station staff are aware of the categories of abuse and the possible indicators.

The four categories of child abuse are as follows:

1. Physical Abuse
2. Emotional Abuse
3. Sexual Abuse
4. Neglect

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 a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Some of the Possible Indicators could include or may be recognised by:

Children with frequent injuries, injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury.

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. These may include interactions that are beyond a child's developmental capability as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Some of the Possible Indicators could include or may be recognised by:

Developmental delay, attachment issues, aggressive behaviour, appeasing behaviour, watchfulness or stillness, low self-esteem, withdrawn or a loner, or having difficulty in forming relationships. Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.

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 in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Some of the Possible Indicators could include or may be recognised by:

Inappropriate sexualised conduct, age-inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports/ PE etc., pain or itching in genital area, blood on underclothes, bruising in genital region and/or inner thighs etc.

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 a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some of the Possible Indicators could include or may be recognised by:

Being constantly hungry; constantly tired; have a poor state of clothing; be emaciated; have untreated medical problems; be frequently late or have poor or non-attendance at provision; have low self-esteem; display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive, or be left with or in the care of adults under the influence of alcohol or drug misuse.

15. Operation Encompass

At The Regulation Station we are working in partnership with local authorities and Police to identify and provide appropriate support to students who have experienced domestic abuse in their household; nationally, this scheme is called Operation Encompass. In order to achieve this the local authority will share police information with the nominated Operation Encompass SPOC of all domestic incidents where one of our students has been affected. On receipt of this information, the nominated Operation Encompass SPOC will decide on the appropriate support the child requires - silent or overt.

All information sharing and resulting actions will be undertaken with the 'LC Protocol for Domestic Abuse-Notifications to Schools.' We will record this information and store this information in accordance with the record keeping procedures outlined in this policy. Operation Encompass now informs the school if a child is 'missing'.

16. Contextualised Safeguarding

We recognise safeguarding incidents and/or behaviours can be associated with factors outside of the provision and/or can occur between children outside of provision. All our staff, but particularly our Designated Safeguarding Leads (DSLs) will consider the context within which such incidents and or behaviours occur. We recognise this is known as 'contextual safeguarding' and will consider by assessing whether wider environmental factors are present in a child's life that threaten their safety or welfare. In such cases we will work with safeguarding agencies and support the child and family as part of any referral process.

Contextual safeguarding/extra familial risk as referenced in KCSIE (2025) highlights that 'assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare including online abuse, county lines, serious youth violence, radicalisation, and exploitation) must be actively considered. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process

The Regulation Station understand contextual safeguarding and will make a referral in the first instance if apparent.

17. Safeguarding in specific circumstances

17.1 Children who are vulnerable to extremism

- The regulation Station seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- In accordance with the Prevent Duty placed upon the provision by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism.
- The Regulation Station is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- Are clear that this is exploitation and radicalisation should be viewed as a safeguarding concern
- Understand the referral process within Luton/central Bedfordshire should a Prevent concern arise
- The regulation Station values freedom of speech and the expression of beliefs /

ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to this the provision promotes fundamental British values of Democracy, Rule of Law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and equality of opportunity and the rights of all Women and Men to live free from persecution of any kind and it would be expected that views and opinions expressed would be commensurate with these.

Risk reduction

- The Head of Provision and the Designated Safeguarding Leads will assess the level of risk within the provision and put actions in place to reduce that risk. Risk assessment may include consideration of the provision's curriculum, SEND policy, the use of provisions premises by external agencies, integration of children by gender and SEN, anti-bullying strategy and other issues specific to the provision's profile, community and philosophy.
- In addition, the provision Prevent Action Plan template is used to demonstrate how the provision is fulfilling the prevent duty. A copy is held by the DDSL/Prevent SPOC.
- This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and the local multi-agency safeguarding arrangements.
- In accordance with the Prevent Duty, Anne Clark is the Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.
- When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and registered school.
- If a child or Young Person is thought to be at risk of radicalisation, advice will be sought from the Channel Team or the Multi-Agency Safeguarding Hub (MASH). A referral will be made to the MASH, and if advised, information will be shared with the Channel Panel who may advise a National Referral form be completed.
- In all cases, in accordance with advice from the Channel Team or MASH, the registered school will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children assessed as being vulnerable to radicalization
- If the provision is concerned that a child may be at risk of significant harm in relation to radicalisation or involvement in violent extremism a child, protection referral will be made to the Multi Agency Safeguarding Hub

17.2 Female Genital Mutilation/Forced Marriage/Modern Day Slavery

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.
- FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM or help someone trying to do this.
- Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) to report to the police where they discover (either through disclosure by the victim or

visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the provision's safeguarding reporting procedures. A Teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions.

- Those failing to report such cases will face disciplinary sanctions.
- If the provision is concerned that a child / young person has experienced or is at risk of FGM a Child Protection referral will be made to the Multi Agency Safeguarding Hub in accordance with interagency procedures produced by the LSCB. In addition, all teachers will follow mandatory reporting duties.
- Further information regarding FGM can be found in Appendix five.
- A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
- The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.
- The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry This includes:
 - o taking someone overseas to force them to marry (whether or not the forced marriage takes place)
 - o marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
 - o breaching a Forced Marriage Protection Order
- Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol)
- These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour or facilitating their travel with the intention of exploiting them soon after.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

Types of human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- sexual exploitation
- forced labour
- domestic servitude
- organ harvesting
- child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc
- forced marriage and illegal adoption (if other constituent elements are present)

17.3 Child on Child abuse

- Staff must challenge inappropriate behaviours between children. Behaviours such as dismissing harassment as “banter” or “part of growing up” must not be tolerated, as they can create unsafe cultures.
- The provision is aware that children can abuse other children (often referred to as child-on-child abuse). Most cases of students hurting other students will be dealt with under our behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.
- The provision recognises that children can abuse other children. It can happen both inside and outside provision and online. Such behaviours are never viewed simply as ‘banter’ or as part of growing up. Downplaying certain behaviours, for example, dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys will be boys” can lead to a culture of unacceptable behaviours and an unsafe environment for children. Subsequently this can normalise abuse, leading children to accept this is normal and minimises the chances of reporting it.
- We recognise that child on child abuse can take many forms such as:
 - o bullying (including cyber-bullying, prejudiced-based and discriminatory bullying)
 - o physical abuse including hitting, kicking, shaking, biting, pulling hair and online abuse that facilitates, threatens or encourages physical abuse
 - o sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as youth Produced Sexual Imagery)
 - o consensual and non-consensual sharing of nudes and semi-nudes and or videos (also known as sexting and youth produced sexual imagery)
 - o sexual assault causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in a sexual activity with a third party
 - o sexual violence or harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse (this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - o upskirting (an illegal offence which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification)
 - o sexually harmful or problematic behaviour
 - o gang initiation or hazing type violence (initiation/hazing type violence and rituals (which could include activities involving harassment, abuse or humiliation used in a way of initiating a person into a group and may include an online element)

The provision understands that even if there are no reports in the provision it does not mean it is not happening. It may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL.

It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to concerns. Staff should be clear as to the provision’s policy on child on child abuse and their role in preventing it.

At The Regulation Station, we minimise the risk of Child-on-Child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including the sharing of nude and semi-nude images and following the UKCIS advice.

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially. Students will be taken seriously and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment. (Paragraph 18 KCSIE 2025)
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

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

- The allegation must be recorded and reported to the DSL/DDSL, individual staff do not investigate.
- The DSL/DDSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL/DDSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL/DDSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- Child on Child abuse will be recorded

The provision will reassure victims 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 abuse, exploitation, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The provision will follow Sexual Violence and Sexual Harassment guidance (DfE, 2017) when responding to such issues alongside local interagency procedures and the Harmful Sexual Behaviours strategy. This includes responding to any reports in a child centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children. The provision will respond to reports of sexual violence and sexual harassment on a case-by-case basis considering the Effective Support Document whether a criminal offence may have been committed and whether a report to the Multi Agency Safeguarding Hub or the police is necessary. The provision will also consider, in collaboration with the registered school, seeking specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

The Regulation Station understands serious violence and what may signal that children are at risk from or involved in serious violent crime. Indicators may include increased absences, a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in wellbeing or signs of assaulted/unexplained injuries. Unexplained gifts or new possessions could indicate that children have been appropriated, or are involved with, individuals associated with criminal networks or gangs.

The provision will have sight of Part 5 - Child on child sexual violence and sexual harassment in KCSIE 2025 and understand how to report and respond to allegations of sexual violence or sexual harassment.

17.4 Sexualised Behaviours

- Where children display sexualised behaviours, the behaviours will be considered in accordance with the children's developmental understanding, age, and impact on the alleged victim. Tools such as Brook Traffic Light Tool will be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child/ren receive the right support at the right time either via the Family Partnership Service or referral to Children's Social Care.
- The provision will utilise support and guidance from wider services such as Luton Sexual Health and make referrals where necessary.
- The provision will manage incidents of sexualised behaviour on a case by case basis, with consideration to the alleged victim and perpetrator.
- In all cases of child on child abuse the provision will consider the vulnerability of all children including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response consistent with Local Authority support models.
- Where necessary, the provision behaviour policies will be invoked, and any sanctions applied will be consistent with these procedures.
- Where issues indicate that a criminal offence may have been committed a report will be made to Bedfordshire police. The provision will support victims through reporting concerns to the police and will ensure the well-being of the child is supported thereafter.

17.5 Gang Related Violence (Contextual/Extra Familial Risk)

- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the provision and/or can occur between children outside of these environments.
- All staff, but especially the DSL (and deputies) should consider whether children are at risk of exploitation or abuse outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation and serious youth violence.
- Provision is aware of indicators that may signal children are involved with serious violent crime. All staff recognise that these may include:
 - o Increased absences from provision
 - o A change in friendships or groups (friendships with older children or groups)
 - o A decline in performance
 - o Changes to wellbeing or signs of self-harm
 - o Unexplained injuries
 - o Unexplained gifts and possessions (this may indicate they have been approached with individuals associated with gangs)

The provision identifies risk factors associated with children that have been permanently excluded from school. Further advice regarding youth violence is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

- The provision recognises the risks posed to children in relation to involvement in gang related activity, which may be street gang, peer group or organised crime. Young people who are involved in gangs are more likely to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of an initiation or hazing practices

- The provision understands that referral can be crucial in the early identification of children who may need additional support due to gang related activity and as such will provide an appropriate response/referral to the Family Partnership Service
- If, however, information suggests a child may be at risk of significant harm due to gang related activity, a referral will be made to the Multi Agency Safeguarding Hub within Children's Social Care
- Where there are concerns that a child or young person may be, or is at risk of becoming involved in gang related activity, a referral will be made to the MAG panel in accordance with local procedures as part of the safeguarding response
- The regulation Station understands the process of completing a Multi-Agency Submission form which highlights broader concerns contextually occurring outside of the child's home.

17.6 Youth Generated Sexualised Imagery

The provision recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the Guidance issued by the UK Council for Child Internet Safety in relation to how we respond to incidents.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and or videos can be signs that children are at risk.

- In all cases where an incident of youth produced sexual imagery is reporting the following actions will be undertaken:
 - o the incident should be reported to the Designated Safeguarding Lead as soon as possible.
 - o the Designated Safeguarding Lead should hold an initial review discussion or meeting with appropriate provision staff.
 - o there should be subsequent interviews with the young people involved (if appropriate).
 - o parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
 - o at any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.
- An immediate referral will be made to the Police and Social care in the following circumstances:
 - o the incident involves an adult
 - o there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
 - o the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 - o the imagery involves sexual acts and any student in the imagery is under 13
 - o there is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming
- If none of the above applies the provision may choose to deal with the incident without

involving the police or social care. This will usually be the case where the Designated Safeguarding Lead is confident that they have enough information to assess the risks to the students involved and the risks can be managed within the provision pastoral support and disciplinary framework. All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/ren.

- The provision will pay due regard to the Department for Education guidance: Searching, Screening and Confiscation advice.
- Adults in the provision will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the designated safeguarding lead will respond to an incident based on what they have been told about the imagery.

Staff must not print or forward these images.

- All incidents will be recorded

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

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. it may involve physical contact, including assault by penetration (e.g., rape, oral sex) on non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may include non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave sexually in inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g.; they believe they are in a genuine romantic relationship.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for protection from harm from others. As children involved in CCE often commit crimes themselves, their vulnerability (particularly older children) as victims is not always recognised by adults and professionals, and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to boys. The indicators may not be the same, however professionals should be aware that they are at risk of CCE as well. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Both CSE and CCE are forms of abuse that occur where an individual or group takes

advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, and/or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved i.e. trafficked for the purpose of exploitation.

The provision recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such ensure staff are alert to signs and indicators.

- The provision recognises that there are various 'models' of CSE which include but not limited to:

gangs and groups	boyfriend/girlfriend model
child on child	familial
online	abuse of authority
- Where concerns are identified in relation to Child Sexual Exploitation the Effective Support Document will be consulted in order to ensure the child receives support at the earliest possible opportunity.
- A multi-agency response via Family partnership Service/MASH may be initiated in response to a referral. Where parental consent cannot be obtained, advice will be sought from the Multi-Agency Safeguarding Hub (MASH).
- If a child is thought to be at risk of significant harm through child sexual exploitation a referral will be made to the Multi Agency Safeguarding Hub within children's social care
- In all cases intelligence will be shared with Bedfordshire Police using the information sharing form which will also be copied to the Single Point of Contact for CSE within Luton/Central Bedfordshire Council

Our staff will be alert to the potential needs for early help for a child who:

- is disabled and has specific additional needs.
- has special educational needs (whether or not they have a statutory education, health and care plan EHCP).
- has a mental health need.
- is a young carer.
- is showing signs of being drawn into anti-social behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home.
- is misusing drugs or alcohol themselves.
- is at risk of modern-day slavery, trafficking or exploitation.
- has a family member in prison or affected by parental offending.
- 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 an age-inappropriate understanding of sexualised behaviours.
- is privately fostered.
- is at risk of 'honour' based abuse, e.g., FGM or Forced Marriage.
- is persistently absent from education including parts of a provision day.

18. Children with Special Education Needs

We recognise that students with special educational needs (SEN) and disabilities can face

additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

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

Teachers, Wellbeing and Learning Support Assistants, students and parents are always asked to feedback on progress towards a student's EHCP targets. This is an important part of our annual review progress for students with EHCPs. We ask students, parents and provision staff to comment yearly on our SEND provision and the information we receive enables us to review our offer and work in partnership with our provision community.

19. Confidentiality

The Regulation Station will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Data protection and GDPR do not override the need to share safeguarding information where a child is at risk of harm. Staff must not allow fears about information sharing to delay or prevent safeguarding actions.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

We have adopted the information sharing principles detailed in statutory safeguarding guidance contained within:

- DfE KCSIE 2025 paragraphs 82 to 88 and paragraph 94 has been updated to further clarify about GDPR and withholding information

Additional information about powers to hold and use information when promoting student's welfare can be found on paragraph 105 KCSIE 2025.

- HM Working Together to Safeguard Children 2018 Para 23 to 27 and on pages 20 and 21.
- HM Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (which has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018.)

Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. A school could, for example, consider taking positive action to support girls if there was evidence, they were being disproportionately subjected to sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for disabled children and young people.'

20. Recording and Monitoring

Our provision will record all safeguarding concerns and follow up correspondence from all agencies involved with the support of individual students. All staff are trained on how to log concerns and DSLs have updated training on how to maintain records and add to cases.

Any concerns about a child will be recorded and reported within 30 minutes. All records will provide a factual and evidence-based account and there will be accurate recording of any actions within 24 hours. Where an opinion or professional judgement is recorded this should be clearly stated as such.

Records are maintained through the chronology of events. Where concerns or referrals are passed on to external agencies, these are uploaded and recorded with the students' records. Any meeting agendas or action plans are also uploaded and recorded when received from social care/agencies. These records allow the DSL team to track the journey of the student. Where concerns or incidents are resolved, these are 'archived' by the safeguarding team to highlight that there is no longer involvement or concern.

At no time should an individual teacher/member of staff or provision be asked to or consider taking photographic evidence of any injuries or marks to a child's person; this type of behaviour could lead to the staff member being taken into managing allegations procedures.

Why recording is important

Our staff understand why it is important that recording is comprehensive and accurate and what the messages from serious case reviews are in terms of recording and sharing information. It is often when a chronology of information is pieced together that the level of concern escalates or the whole or wider picture becomes known.

All staff receive regular safeguarding and child protection training during induction for new staff, regular staff briefings for key messages, updates to guidance delivered in twilight CPD sessions and during teacher training days in addition to other training as required. Training is given to all staff on conduct with students and what to do if a student makes a disclosure.

All staff, including admin and support staff, are aware of the need to report any suspected/confirmed issues involving students to the DSL/DDSL and any issues regarding staff to the Head of Provision.

21. Safer Recruitment and Selection

The Regulation Station pays full regard to 'Keeping Children Safe in Education (DfE 2025). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that the candidate has the health and physical capacity for the job. We also undertake interviews and appropriate checks through the Disclosure and Barring Service (DBS) and prohibition order checks. All recruitment materials will include reference to the provision's commitment to safeguarding and promoting the wellbeing of children. Members of the senior leadership team have undertaken Safer Recruitment training and are involved in all staff recruitment processes. Shortlisted candidates will be made aware that online searches may be done as part of due diligence checks

22. Involving Parents/Carers

In general, we will discuss any safeguarding and child protection concerns with parents/carers before approaching other agencies and will seek consent to make a referral to another agency. However, there may be occasions when the provision will contact another agency

before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

23. Multi – Agency Work

The Regulation Station works in partnership with other agencies in the best interests of children. The provision will, where necessary, liaise with the school nurse, the Educational Welfare Officer or make referrals to Children's Social Care including Family Partnership and/or MASH, amongst other interventions and support available.

25. Responding to allegations or concerns about member of staff

All staff working in our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

Allegations or concerns about colleagues or visitors must be reported directly to the Managing Director Jackie Brooks. Alternatively, concerns can be reported directly to the Local Authority Designated Officer (LADO- Luton 01582 548069/Central Bedfordshire 0300 300 8585) in Children's Social Care.

25. Policy Review

This policy will be reviewed every year as a minimum. In between reviews, the policy will be updated when necessary to reflect local and national changes. This is the responsibility of the Head of Provision and Directors.

In order to ensure that this policy is relevant, if you have any suggestions for additions or amendments, please email theboard@theregulationstation.org

Associated policies/documents

- Working together to safeguard Children (DfE 2018)
- Keeping Children Safe in Education (DfE 2025)
- Complaints Procedure Statement
- E Safety Policy
- Inclusion – race, equality, gender & disability
- Special Educational Needs
- Staff Code of Conduct
- Allegations of abuse against staff
- Anti-Bullying Strategy
- Attendance Policy
- Student/Parent/Carer Code of Conduct Agreement
- Curriculum Policy
- Whistleblowing
- Safer Recruitment