

**Child Protection & Safeguarding Policy**

**DEC 2025**

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**This policy has been reviewed and Approved by:**

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## Change History Record

Version	Date	Details of Change(s)	Approved By
2.0	5/12/2025	Implementation of V2 policy	Brian Mair

## Scope

Nudge Education exists to eradicate chronic disengagement from Education and as such, we are often commissioned to work with some of the UK's most vulnerable young people. Our Child Protection and Safeguarding Policy has been drafted and approved by the Directorate of Nudge Education to ensure our staff, associates, young people and commissioners are fully aware of our commitment to Safeguarding under relevant legislation and guidance listed within this policy document.

### Main Updates for 2025:

The 2025 update to Keeping Children Safe in Education (KCSIE) includes significant changes, such as the addition of 'exploitation' alongside 'abuse and neglect' in defining child protection concerns. These updates reinforce the need for vigilance against harm occurring both within and outside the home, including online, and emphasise the importance of Contextual Safeguarding. Additionally, the updated definition of safeguarding now includes early intervention and protection from maltreatment in all environments.

1. The content definition under online safety is expanded to include: "being exposed to illegal, inappropriate or harmful material , misinformation, disinformation (including fake news) and conspiracy theories." (Section 14)
2. An update therefore took place to our Online Safety policy relating to the risks and usage of generative AI within our interventions.

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## **Statement of Intent**

This policy was drafted to ensure the principles of the following legislation and guidance are intrinsic to our ethos and practice:

[Children Act 1989](#)

[Children Act 2004](#)

[Working together to Safeguard Children 2023](#)

[Framework for the Assessment of Children in Need and their Families' 2000 \(Department of Health\)](#)

['What to do if you're worried a child is being abused' Advice for Practitioners 2015 \(Department for Education\)](#)

[Keeping Children Safe in Education 2025](#)

(Herein referred to as KSCIE 2025)

[Equality Act 2010](#)

[Education Act 2002](#)

[Special Educational Needs Code of Practice 2015](#)

This policy aims to:

- Support the young person's development in a method that will foster security, confidence and independence.
- Provide an environment in which young people feel safe, secure, and respected, with the confidence to approach adults appropriately and ensure that their concerns are listened to.

- Highlight to all Nudge Education staff of the need to safeguard children and young people, including their responsibilities in identifying and reporting suspicions of abuse.
- Document the methods of monitoring young people thought to be at risk of harm and set in place suitable support systems.
- Highlight the need for clear lines of communication at all levels of the organisation.
- Develop and maintain effective working relationships with other agencies and organisations in relation to the safeguarding of young people i.e. police and local authorities.
- Ensure that all Nudge Education staff who come into contact with young people and other vulnerable groups have been checked for role suitability including enhanced disclosure and barring scheme (DBS) checks and relevant training (specific to role), with a central record being kept for audit purposes and to make reports to authorities if those who are barred from working with young people or apply to work with us.

## **Definition of Safeguarding**

For the purposes of this policy, Nudge Education will use the definition given in key government guidance documents: “Working Together to Safeguard Children 2023” and “Keeping Children Safe in Education 2025”.

“Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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 the 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, and
- taking action to enable all children to have the best outcomes.”

*(Working Together To Safeguard Children Page 7)*

## **Monitoring and Evaluation**

Our Child Protection and Safeguarding Policy and Procedures will be monitored and evaluated by the Directorate of Nudge Education in coordination with our external advisors and the. We will use information such as:

1. Minutes of meetings relating to child protection and safeguarding.
2. Surveys and feedback from both young people, parents/carers and commissioners.
3. Review of records of bullying/racist/sexually inappropriate incidents.
4. Content of appropriate training courses.
5. Observational data of education provision, for example drop in visits or support visits.
6. Feedback from commissioners and external safeguarding agencies.
7. Minutes from external advisor meetings
8. Internal compliance audits.
9. External commissioner quality assurance audits.

In line with KCSIE 2025, there is also consideration for recording outcomes where no referral has been made. Those staff working with children and young people should record “all concerns, discussions and decisions made including the rationale for those decisions. These recordings should include instances where referrals were or were not made to another agency such as LA children’s social care or the Prevent programme etc.”

### **Communication with Parents/Carers**

We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively. We will always undertake appropriate discussion with parents/carers prior to involvement of another agency unless to do so would place the young person or an adult at further risk of harm or would impede a criminal investigation.

We will ensure that parents/carers have an understanding of the responsibilities placed on Nudge Education and their staff to safeguard children and their duty to co-operate with other agencies in this respect.

## **1.Young Person Considerations**

Nudge Education realises that any young people who are experiencing abuse, or are witness to abuse may not feel empowered to change their situation and indeed may not even realise that they are being abused.

Nudge Education also understands that young people who are in this situation may display a range of behaviours.

Nudge Education adheres to the protocol that we will notify the commissioner and relevant safeguarding bodies as soon as there is a concern about a young person and we will work with all parties to ensure that child protection processes are followed in a confidential manner. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the Regional Designated Safeguarding Lead (RDSL) if they have concerns about a young person.

Everyone working within Nudge Education will be aware of the definitions and signs and symptoms of abuse. Using the definitions from the guidance document “KSCIE 2025)” we recognise there are five types of abuse:

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children or young people may be abused in a family, institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult, adults or by another child or children.

**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.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development.

**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.

**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.

Underpinning all of the above points is our understanding that one of the reasons for a young person becoming disengaged from education is an underlying safeguarding concern and our policy, process and practice aims to make sure we address all concerns effectively.

## 2. Early Help

As the nature of our work means we come into contact with a lot of young people who may already have been subject to safeguarding investigations, we are vigilant in looking out for potential indicators of a safeguarding concern. In line with “*Working Together to Safeguard Children*” (2023) we put specific focus on those young people who:

- are disabled and have specific additional needs
- have special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- are young carers
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- are frequently missing/go missing from care or from home
- are at risk of modern slavery, trafficking or exploitation
- are at risk of being radicalised or exploited
- are in a family circumstance presenting challenges for the young person, such as drug and alcohol
- misuse, adult mental health issues and domestic abuse
- are misusing drugs or alcohol themselves
- have returned home to their family from care
- are a privately fostered child

Nudge Education will also follow official guidance on specific safeguarding matters to ensure all relevant people within or working with the organisation are up to date with recommended practices.

In line with KCSIE 2025 update that “staff should be alert to the potential need for Early Help for pupils who have ‘experienced multiple suspensions, [are] at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.’”, we have adapted this to show where we start to experience changes in attendance or behaviour during an intervention, this may be an indication of an early help need.

There are a number of sources referenced In Appendix B of KSCIE 2025 that we have used to inform this policy as well as some of the documents in the links below:

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

<https://www.gov.uk/government/publications/children-missing-education>

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

<https://www.gov.uk/domestic-violence-and-abuse>

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

<https://www.gov.uk/forced-marriage>

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<http://educateagainsthate.com/>

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

<https://www.gov.uk/government/publications/children-act-1989-private-fostering>

<https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

Our Education Intervention Coordination (EIC) Team, Regional Leads, and Assistant Regional Leads support the Regional Designated Safeguarding Leads (RDSLs) by holding accredited Level 3 Safeguarding training as an addition to their Level 2 qualifications.

### **3. Commissioner Specific Requirements**

As Nudge Education is a national intervention provider, we understand that processes and procedures will vary slightly from one local authority to the next so although this document specifically relates to Nudge Education's own Child Protection and Safeguarding processes, we endeavour to:

- Familiarise ourselves with the contact information for the Local Authority Designated Officer (LADO) for each region
- Engage with training and resources from the Local Authority's Safeguarding Partnership (Formerly Local Safeguarding Children Boards)
- Identify a Single Point of Contact (SPoC) within each commissioner to refer day-to-day concerns to (this may be one person or a referral service such as safeguarding team)
- Undertake relevant audits required for due diligence, such as a [Section 11 audit](#)
- Refer directly to relevant 'front-door' services where this is stipulated in the referral form or communications with commissioner

### **4. Confidentiality Considerations**

Nudge Education understands that all matters relating to child protection are confidential and our Safeguarding Team will only disclose information about a young person to other members of staff on a need to know basis.

Nudge Education informs staff members at induction and regularly updates throughout the year that they have a professional responsibility to share information with relevant agencies to safeguard young people who we are commissioned to work with.

All staff are also made aware that a safeguarding disclosure by a young person or staff member means that they cannot promise to withhold information from relevant agencies that may compromise a young person's safety.

At the point of initial assessment we inform both young person and parent/carer of the above considerations as well.

### **5. Supporting Staff**

Nudge Education recognises that staff may develop personal attachments to the young people they support. While all staff are trained to maintain professional boundaries, we understand

that witnessing or becoming aware of instances of abuse or harm can have a significant emotional impact. In such cases, we are committed to supporting our staff by providing a confidential environment in which they can discuss their concerns and feelings with the Designated Safeguarding Lead (DSL), Deputy DSL, or their Line Manager.

We understand that a young person may make an allegation against a member of staff and that in this instance the following process will be followed:

1. Where there is a history of a young person making false allegations, it would be recommended that the intervention is staffed at a 2:1 ratio.
2. If an allegation is made against a member of staff, the person who receives the information will immediately inform the NDSL or RDSL.
3. The NDSL or RDSL will then discuss the details of the allegation with the relevant Local Authority Designated Officer (LADO) and other safeguarding contacts within our commissioner's organisation.
4. If the allegation refers to the NDSL or RDSL then the person receiving the allegation will go straight to the LADO or equivalent, removing the NDSL or RDSL out of the communication process.
5. Suspension of a staff member needs careful consideration. Nudge Education will review each case both internally and with the relevant local LADO before a decision is made.
6. After the LADO investigation takes place, a formal HR investigation will then take place to cover any conduct and safeguarding concerns.

Where referrals are made to the LADO, it is our role to manage these referrals in a timely and appropriate manner.

## **6. Whistleblowing**

Nudge Education recognises that the young people we are commissioned to support may not be fully aware of the procedures for raising any concerns they might have. As such, it is vital that all staff understand their responsibility to report any safeguarding or child protection concerns. This includes concerns relating to the actions or behaviour of colleagues or associates.

In the first instance, any concern should be reported to Nudge Education's Named Designated Safeguarding Lead (NDSL) or Regional Designated Safeguarding Lead (RDSL). Where appropriate, concerns should also be escalated to the Local Authority Designated Officer (LADO) for the area in which the staff member is working. Contact details for the relevant LADO can be found on the local authority's website or in the Nudge Education briefing pack provided for each young person.

We will also, upon the advice of the LADO, make the relevant referral to the DBS and Teachers Service (<https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>)

## **7. Physical Intervention**

Nudge Education believes that physical intervention with a young person should only be used as a last resort, when it is judged by a practitioner that the young person is endangering themselves or others and that it is the most minimal force necessary that must be applied in that instance.

Every incident of physical intervention must be documented and sent to Nudge Education's NDSL/RDSL and signed by both the staff member involved and the RDSL/ NDSL.

All staff members likely to be involved in the use of physical intervention will be a) already trained in CPI Safety Intervention Training or b) will receive this training prior to being matched with a young person where risk is identified as high.

The concept of 'integrated experience', where the professional's behaviours and attitudes can have an impact on others runs throughout all of our interventions so we can spot early signs of escalation and take appropriate action without the need for physical intervention wherever possible.

Nudge Education acknowledges that physical intervention that results in injury or distress to a young person may be considered under the disciplinary procedure if proved after investigation to be excessive force.

Nudge Education acknowledges that professional touch is appropriate in the context of working with young people. All our staff have been given 'Safe Practice' Guidance based upon the Statutory guidance for schools and colleges; (KSCIE 2025) to ensure that professional boundaries are clear.

## **8. Anti-Bullying**

Nudge Education adheres to the belief that if bullying is allowed or condoned then this may be considered under child protection procedures. All records of bullying incidents will be logged centrally and passed back to the commissioner for review. Our primary intervention model sees us working with individual young people that are disengaged from school however we understand that bullying can still occur both to, and by our students, so we follow a set policy.

We take into consideration many legislative guidance documents such as the Equality Act 2010, Preventing and Tackling Bullying: Advice for School Leaders, Staff and Governing Bodies, October (2014) and KSCIE (2025).

## **9. Peer-on-child Abuse**

In line with the updated definition of safeguarding in KCSIE 2025, which now includes 'exploitation', Nudge Education remains committed to preventing all forms of child-on-child abuse, including those occurring outside the home. This contextual safeguarding approach recognises that abuse can take place in various settings, including online and in the community. The inclusion of exploitation emphasises the need to view all children involved in such incidents as potential victims rather than offenders, particularly in cases where they may have been groomed into harmful behaviours.

The majority of our interventions are commissioned on an individual basis, where we work intensively with one young person to support their transition into a permanent setting. As a result, the risk of peer-on-peer abuse occurring during a Nudge intervention is limited. However, we remain fully aware of the importance of preparing young people for reintegration into group environments, and we remain alert to any concerns that may arise in relation to this transition.

At Nudge Education, we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and wellbeing. It is also a consideration as part of KCSIE 2025 that all organisations should have a policy regarding child-on-child abuse.

Types of abuse associated with child-on-child abuse:

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken. These could be primary factors behind a young person's disengagement from education so it is critical all people working with our young people are aware of them.

### **9.1 Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)**

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally, before considering the action or punishment to be undertaken.

### **9.2 Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)**

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language and inappropriate role play, to sexually touching another or sexual assault/abuse.

### **9.3 Sexting**

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude

picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

If a young person comes to you that has sent or received a photo or video of this nature, follow this process:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the NDSL/RDSL and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

#### **9.4 Initiation/Hazing**

Hazing is a form of initiation which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it tests newcomers by subjecting them to a series of trials which forms a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

#### **9.5 Upskirting**

'Upskirting' 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, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

#### **9.6 Prejudiced Behaviour**

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural

and religious backgrounds, gender identity, home life (for example in relation to issues of care, parental occupation, poverty and social class) and sexual orientation .

### **9.7 Teenage relationship abuse**

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The alleged abuser uses this pattern of violent and coercive behaviour in order to gain power and maintain control over the partner.

### **9.8 Prevention of child-on-child abuse**

Nudge Education recognises that we have a part to play in the prevention of harm to the young people we are commissioned to work with and will strive to create an environment where young people feel safe and are given an open forum in which to discuss their feelings or anxieties.

Young people will also be made aware that there is an appropriate adult within the organisation whom they can approach with these concerns.

Nudge Education will also provide guidance and qualifications where appropriate to ensure emotional and social personal development and to teach students the skills required to stay safe from harm.

This includes safe usage of mobile and communication technologies and the highlighting of associated risks.

## **10. Prevent and Channel Duty**

As part of the Counter-Terrorism and Security Act 2015, Nudge Education recognises their responsibilities in keeping young people safe from risk of radicalisation and away from exposure to extremist behaviour.

Any acts that are perceived to indicate a young person has been radicalised' or is distributing extremist literature is to be reported to the relevant local LADO and local Prevent Duty authority (details of which will be available from Nudge Education's NDSL /RDSL.)

All staff within Nudge Education are to be trained annually and given guidance in the Prevent Duty legislative advice.

Channel duty is guidance given by the Government to protect vulnerable individuals and groups from becoming radicalised. Section 9 of this guide on safeguarding is particularly useful to our organisation:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/964567/6.6271\\_HO\\_HMG\\_Channel\\_Duty\\_Guidance\\_v14\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf)

Although we do not meet the criteria in Annex B of Channel guidance, we operate under the same principles of Working Together to Safeguard Children (2018) from a multi-agency approach and make our commissioners aware of any signs of extremism or radicalisation in our young people or their families.

Indicators of potential radicalisation could be:

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

If any young people are displaying these behaviours, it should be raised to Nudge Education's Safeguarding Team via the safeguarding concerns form which is on the front page of every intervention pack.

This would also be reported on the safeguarding section of the Weekly Session Evaluations that would be sent to the commissioner. If it felt that the matter required more urgent escalation this would be passed on via phone and email to the commissioner. It would also require a Prevent Referral to be made to the local police. The responsibility for this would be agreed between the commissioner and Nudge Education.

As part of every Nudge intervention, learning around relationships, sex, health and education (RSHE) is embedded and age appropriate for young people to promote British values.

## **11. Health & Safety**

Nudge Education's Health and Safety Policy is documented in full separately and is focussed on ensuring that our young people and staff are kept safe as far as practicable whilst working with us. This covers a range of academic and therapeutic activities as well as undertaking educational trips and visits.

A thorough and robust risk assessment is carried out for each external visit and event taking into consideration each young person's individual needs and requirements.

All staff will be given thorough training prior to beginning an intervention which will cover Health and Safety, Child Protection, Safeguarding, First Aid, De-escalation training and positive behaviour support training like CPI safety intervention training when required.

## **12. [Female Genital Mutilation \(FGM\) mandatory reporting duty](#)**

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

In line with Section 5B of the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015), there is a legal duty on teachers, including Nudge Education Practitioners, and other regulated health and social care professionals in England and Wales to report to the police where they personally identify that FGM appears to have been carried out on a girl under the age of 18. This may be through a direct disclosure from the child or through visual evidence.

While it is rare for teachers or education practitioners to see visual signs of FGM, and they are not expected to conduct any form of examination, the same standard applies to all professionals under this mandatory duty.

A failure to comply with this duty could result in disciplinary action.

Clear guidance on when and how to make a report is available in the government's publication [Mandatory reporting of female genital mutilation procedural information](#).

Nudge Education Practitioners have a legal duty to make a direct report to the police if they personally suspect or discover that FGM appears to have been carried out on a girl under the age of 18. This includes situations where the practitioner has either been told by the individual or has observed clear physical signs.

Where possible and appropriate, the practitioner should also discuss the case with their Regional Designated Safeguarding Lead (DSL) and involve children's social care, unless there is a good reason not to do so.

This mandatory duty does not apply in cases where there is only a risk of FGM, or where FGM is suspected but not personally observed or disclosed. It also does not apply where the individual is 18 or over. In such circumstances, concerns must still be taken seriously and responded to in line with local safeguarding procedures.

A helpful summary of the FGM mandatory reporting duty is available here:

[FGM mandatory reporting duty](#):

### **13. Forced marriage**

Forcing someone into marriage is a crime in England and Wales. A forced marriage is one in which one or both people do not or cannot give their full and free consent — often due to threats, pressure, or abuse. Coercion can include physical violence, emotional manipulation, psychological pressure, or threats to the person or their loved ones.

A person may also be unable to give consent if they lack the capacity to do so, for example due to learning disabilities or mental health difficulties. In some cases, religious or cultural expectations may be misused to justify coercion, making it difficult for the individual to speak out or seek help.

## **Warning signs of forced marriage may include:**

- Sudden or extended absence from school, particularly overseas travel.
- A decline in behaviour, performance, or engagement in education.
- Family history of older siblings leaving education early or entering early marriage.
- Evidence of self-harm, depression, or isolation.
- Concerns expressed by the child about an upcoming family holiday or event.
- Surveillance by siblings or family members, or restrictions on freedom and autonomy.
- Fear of being disowned, threatened, or shamed by the family or community.

Nudge Education has an important role to play in identifying and responding to concerns about forced marriage. Practitioners should be alert to warning signs and take disclosures seriously, recognising that victims may be at significant risk and face complex barriers to seeking help.

Practitioners can refer to the *Forced Marriage Unit's Multi-agency Guidelines* (pages 32–36 focus on the role of schools and colleges). For support or guidance, the Forced Marriage Unit can be contacted on **020 7008 0151** or by email at **fmu@fco.gov.uk**.

## **14. Online safety**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation, sexual predation: technology often provides the platform that facilitates harm.

An effective approach to online safety empowers Nudge Education to protect and educate the whole organisation in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact: being subjected to harmful online interaction with other users.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

## **Filters and monitoring**

While Nudge Education does not operate education centres or provide on-site IT access to children, our staff often work with children in home environments, public spaces, or community settings, sometimes using Nudge-owned devices or personal devices for educational or safeguarding purposes.

In line with the expectations set out in *KCSIE (2025)*, Nudge Education is committed to doing all that is reasonably possible to limit children's exposure to online risks, including those related to content, contact, conduct, and commerce.

To ensure this:

- **Staff will receive guidance and training** on safe internet use, including expectations around supervision and device use when working with children in public or domestic settings.
- **Practitioners must avoid using unfiltered or unsecured public Wi-Fi** when working with children, and are encouraged to use trusted networks with secure settings and VPNs where necessary.
- **Staff using personal devices** for work purposes must ensure they are appropriately secured, with up-to-date antivirus software, privacy settings enabled, and any relevant safeguarding features in place.
- **The organisation will review filtering and monitoring arrangements annually**, ensuring they remain effective, proportionate, and appropriate to the nature of the work.

Nudge Education will also take into account the age, needs, and context of children supported, as well as the frequency and type of digital engagement, when determining safeguarding measures.

Further guidance on what constitutes “appropriate” filtering and monitoring is available from:

- **UK Safer Internet Centre:** Appropriate Filtering and Monitoring
- **National Education Network (NEN):** E-security guidance for education providers

## Use of mobile technology

Many children have unlimited and unrestricted access to the internet and Nudge Education will carefully consider how this is managed whilst working with a young person.

Whilst it is essential that we ensure that appropriate filters and monitoring systems are in place, we should be careful that “over blocking” does not lead to unreasonable restrictions as to what young people can be taught.

It is generally suggested that due to the intensive nature of our delivery models, and the nature of the young people we work with, young people will not be allowed unsupervised access to ICT or mobile technology whilst on a session with Nudge Education.

Nudge Education works with external partners to review data and information security which incorporates online safety during intervention work. Government guidance around filtering and monitoring provides information for schools and colleges: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges> .

Where devices are owned and managed by Nudge Education, we ensure that software is updated regularly, age-appropriate filters are in place and also known websites that may look to exploit vulnerable young people to engage in abusive or extremist behaviours are blocked. We are currently looking to embed a wide-ranging digital strategy which will be informed in part by this guidance from the UK Safer Internet Centre:

## **Use of generative Artificial Intelligence (AI)**

### **Purpose and Scope**

This policy applies to all staff and young people engaging with generative AI tools as part of their work. It governs:

- The use of AI platforms (e.g. text generators, image creation tools, chatbots)
- Young person exposure to or interaction with AI content
- Data input into generative AI tools
- Use of AI for lesson planning, behaviour support, or assessment

AI use in any safeguarding, emotional support, or decision-making context must always be critically reviewed and monitored by qualified professionals

### **Safeguarding Principles**

Nudge Education applies the following guiding principles when engaging with generative AI:

#### **1. Selective Use with Supervision**

Generative AI tools are not used freely or without oversight. Staff may use them for professional tasks such as drafting teaching materials, supporting planning, or modelling content for critical evaluation. Young people may only engage with AI tools in pre-approved, supervised contexts and with clear learning objectives.

#### **2. Managing Risk of Harmful Content**

Generative AI systems can produce inappropriate, offensive, or misleading outputs. We mitigate these risks through careful tool selection, the use of safety filters where available, and clear protocols for prompt review and reporting of any harmful content generated.

#### **3. Protection of Personal and Sensitive Data**

No personal, identifying, or sensitive information about young people, families, or staff is entered into generative AI systems unless specifically approved and anonymised. AI tools may not be used to process safeguarding data, case notes, or private records.

#### **4. Promoting Critical Thinking and Digital Literacy**

Young people and staff are supported to understand that AI-generated content may be inaccurate, biased, or lacking context. We promote critical questioning, fact-checking, and ethical reflection on the role of AI in influencing opinions or behaviour.

## **5. Staff Training and Governance**

All staff will receive guidance on safe and ethical AI use, including risks related to data protection, safeguarding, and misinformation. Any new use of AI tools within practice is subject to approval by the Senior Leadership Team, and subject to a safeguarding risk assessment. As the field of AI is rapidly changing, updates will be issued as we are made aware of them from best practice in the sector.

## **6. Regular Review and Adaptability**

Given the rapid development of AI technologies, this policy is reviewed quarterly. Any significant incidents involving AI misuse or emerging risks are escalated to the Safeguarding Team and factored into policy updates.

## **Unacceptable Uses of Generative AI**

To protect young people and uphold safeguarding integrity, the following uses are explicitly prohibited:

- Using AI tools to simulate or impersonate others
- Creating content that may humiliate, shame, or target individuals
- Using AI to make behavioural or mental health assessments
- Submitting AI-generated content as authentic student work without transparency
- Entering person-specific, sensitive information (e.g. safeguarding disclosures) into AI tools
- Allowing unsupervised young person use of AI platforms

Violations may result in removal of access, disciplinary action, and safeguarding review.

## **Reporting and Response**

Any concerns regarding misuse, inappropriate outputs, or data breaches involving AI tools must be reported immediately to the Safeguarding Team. These incidents will be logged, reviewed, and, where necessary, reported to the relevant authorities including the Information Commissioner's Office (ICO). Young people will be supported with clear explanations and emotional containment if exposed to harmful AI content.

## **Staff training & associate guidance**

The government guidance document "[Teaching online safety in schools](#)" (DfE 2020) is to be used and adapted to the style of delivery that Nudge Education employs (i.e, the variety of venues that are used to carry out education interventions should be risk assessed in the same way as a school or college would be).

Nudge Education will ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training (paragraph 64) and the requirement to ensure children are taught about safeguarding, including online (paragraph 68), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. Information and support. There is a wealth of information available to support schools and colleges to keep children safe online. The following is not exhaustive but should provide a useful starting point:

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

[www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)

[www.saferinternet.org.uk](http://www.saferinternet.org.uk)

[www.internetmatters.org](http://www.internetmatters.org)

[www.childnet.com/cyberbullying-guidance](http://www.childnet.com/cyberbullying-guidance)

[www.pshe-association.org.uk](http://www.pshe-association.org.uk)

[www.educateagainsthate.com](http://www.educateagainsthate.com)

[www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation](http://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)

[Education for a connected world \(UKCCIS 2020\)](#)

**15. Mental Health** - This section has been informed by KSCIE paragraphs 45-46

All staff have a duty of care to remain vigilant and supportive of students who may be experiencing mental health difficulties. While only trained professionals should diagnose specific mental health conditions, staff should be attentive to changes or patterns in a student's day-to-day behaviour that may indicate a need for mental health support. Where concerns arise, these should be recorded and shared appropriately, in line with safeguarding procedures.

We have access to a range of courses that professionals should undertake in areas such as adverse childhood experiences, mental health in children and adolescents to raise their awareness in such matters.

If there are any concerns regarding a young person's mental health, staff and associates should raise this immediately to their Education Intervention Co-ordinator (EIC) or the Regional Designated Safeguarding Lead (RDSL) at Nudge Education.

This section is also linked to the anti-bullying section (8) of this policy

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2> is a school-specific guidance document that has some useful information that can be applied in Nudge Education interventions and Public Health England has also produced some materials for their '[Rise Above](#)' initiative that students may find helpful.

**16. Child Criminal Exploitation (CCE) & Child Sexual Exploitation (CSE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, 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 a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals,

(particularly older children), 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 that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some indicators of CCE and CSE are below, we recommend that all staff remain alert for these signs and also seek out additional support and training for further clarity from the NDSL/RDSL:

- The young person may suffer from changes in mood and emotional wellbeing
- A young person may misuse drugs and alcohol
- They may go missing for periods of time or regularly come home late
- Young people may regularly miss school, education or Nudge sessions
- They may receive unexplained gifts, money or new possessions
- Young people may also associate with other children involved in exploitation

Young people who have been exploited will need additional support to help engage with education. CSE can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- Have older boyfriends or girlfriends
- Suffer from sexually transmitted infections
- Display sexual behaviours beyond expected sexual development or become pregnant

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

This comes under the banner of contextual safeguarding, i.e. safeguarding concerns that occur outside the home or school. More information is here: <https://contextualsafeguarding.org.uk/>

Advice and guidance around teaching of Relationships, Sex and Health (RSHE) is available here: <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health>

In addition, research has shown that there are additional factors that may increase involvement in serious violence, these are:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

On a separate note, in line with KCSIE 2025, should a young person in our care be required to be interviewed by police, we must ensure that there is an appropriate adult in place throughout the interview. This can be a staff member of Nudge Education, but in the first instance we should contact the commissioner to identify a more suitable advocate such as a parent, carer or social worker.

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible> lays out the role a person takes when nominated as the appropriate adult.

This process will also be followed should a young person under our care be required to be searched by police.

## **17. Safeguarding of Adults**

Nudge Education primarily supports young people under the age of 18. In line with our safeguarding policy, no session will take place in a home environment unless another responsible adult is present with the young person.

However, there may be occasions where a practitioner delivers support in a home where vulnerable adults are also present, or where the young person is over the age of 18. In such cases, safeguarding protocols may differ from those that apply to children and young people. Practitioners must be aware of, and follow, the relevant adult safeguarding procedures.

Each local authority has its own safeguarding guidance and reporting protocols for adults. Practitioners are expected to familiarise themselves with the local procedures for the area they are working in.

## **18. Domestic Violence/Abuse**

In line with changes to KCSIE 2025, we know that research shows an increase in reported cases of domestic violence in recent years. The impact and trauma that this causes to a young person can be significant:

*“Domestic abuse...can [be] psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.”*

KCSIE 2025, p.14

In adult safeguarding there are ten types of abuse in comparison to the five under Children’s safeguarding protocols. These are:

- Physical
- Sexual
- Psychological/Emotional
- Financial
- Neglect
- Self-Neglect
- Organisational (i.e. care homes)
- Discriminatory
- Modern slavery
- Domestic

Any staff member that has direct contact with vulnerable adults via telephone or face-to-face meetings needs to undertake the “Safeguarding Vulnerable Adults” course via the Educare Portal. It is recommended that all staff and associates should undertake this training to improve their practice and knowledge on the subject.

An Education Intervention Co-ordinator (EIC) will have the information for the local adult safeguarding partnership in the area you are working in, and should be contacted if more information is needed.

## **19. LGBTQIA+ Young People**

The 2025 update of *Keeping Children Safe in Education (KCSIE)* replaces the phrase “*children who are lesbian, gay, bi or trans*” with “*children who are lesbian, gay, bisexual, or gender questioning.*” This terminology change (subject to final guidance) is intended to reflect current language in safeguarding and educational contexts.

At Nudge Education, safeguarding policies and staff training reflect the importance of recognising and responding appropriately to the needs of all children and young people, including those who identify as LGBTQIA+ or who may be perceived as such.

While identifying as LGBTQIA+ is not, in itself, a risk factor for harm, evidence indicates that LGBTQIA+ children and young people may face increased risks of bullying, discrimination, or social isolation. Additionally, children who are perceived to be LGBTQIA+ — regardless of whether this is accurate — may also be targeted.

Safeguarding risks may be heightened where a child does not have access to a trusted adult or feels unable to speak openly about their identity or experiences. Staff should be aware of these potential vulnerabilities and take appropriate steps to ensure all young people are listened to, supported, and protected from harm.

All senior staff at Nudge Education have completed training relating to LGBTQIA+ inclusion and safeguarding.

## **20. Recruitment Considerations**

Nudge Education is committed to safeguarding and promoting the welfare of children and young people. As part of this commitment, we implement rigorous safer recruitment processes to ensure that all individuals working with or on behalf of Nudge Education are suitable, skilled, and aligned with our values and safeguarding responsibilities.

In accordance with our Safer Recruitment Policy, all staff and practitioners undergo comprehensive pre-employment checks, including references, identity verification, enhanced DBS checks, and where applicable, checks on overseas criminal records. We also assess applicants’ suitability to work with children and young people through values-based interviews and scenario-based safeguarding questions.

As an additional safeguarding measure, Nudge Education may carry out a review of publicly available social media profiles and online activity for individuals being considered for roles involving direct contact with young people. This is to ensure that their public online presence reflects the professional and ethical standards expected in safeguarding roles and does not raise concerns about their suitability.

If concerns arise from online content that may indicate a risk to the safety or welfare of children or vulnerable adults, this information may trigger a safeguarding investigation and/or be addressed through our disciplinary procedures, in line with both our Safeguarding and Child Protection Policy and Safer Recruitment Policy.

All staff are reminded that their conduct online, even outside of work, must remain consistent with their safeguarding responsibilities and the standards outlined in the Staff Code of Conduct.

## **21. Data Protection**

Nudge Education has a robust Data Protection Policy in place and works with external partners to identify improvements in how data is processed and managed across the organisation. In line with KCSIE 2025, We are committed to aligning with [Government guidance on data protection in school](#) with updating our processes and information governance to ensure that all staff throughout Nudge Education are aware of their responsibilities regarding data protection and processing.

## **22. Contextual Safeguarding**

Throughout this policy, the focus around safeguarding young people within Nudge Education is directed towards working with young people in their environment, usually outside of school. This gives us a very privileged position as we get to work closely with young people and their families, and we are able to gain a vantage point to understand any contextual safeguarding concerns that may arise whilst we are working with them.

All of our operational staff are trained in identifying contextual safeguarding concerns and reporting them to the relevant authorities, as outlined in Annex A : Safeguarding Flowchart.

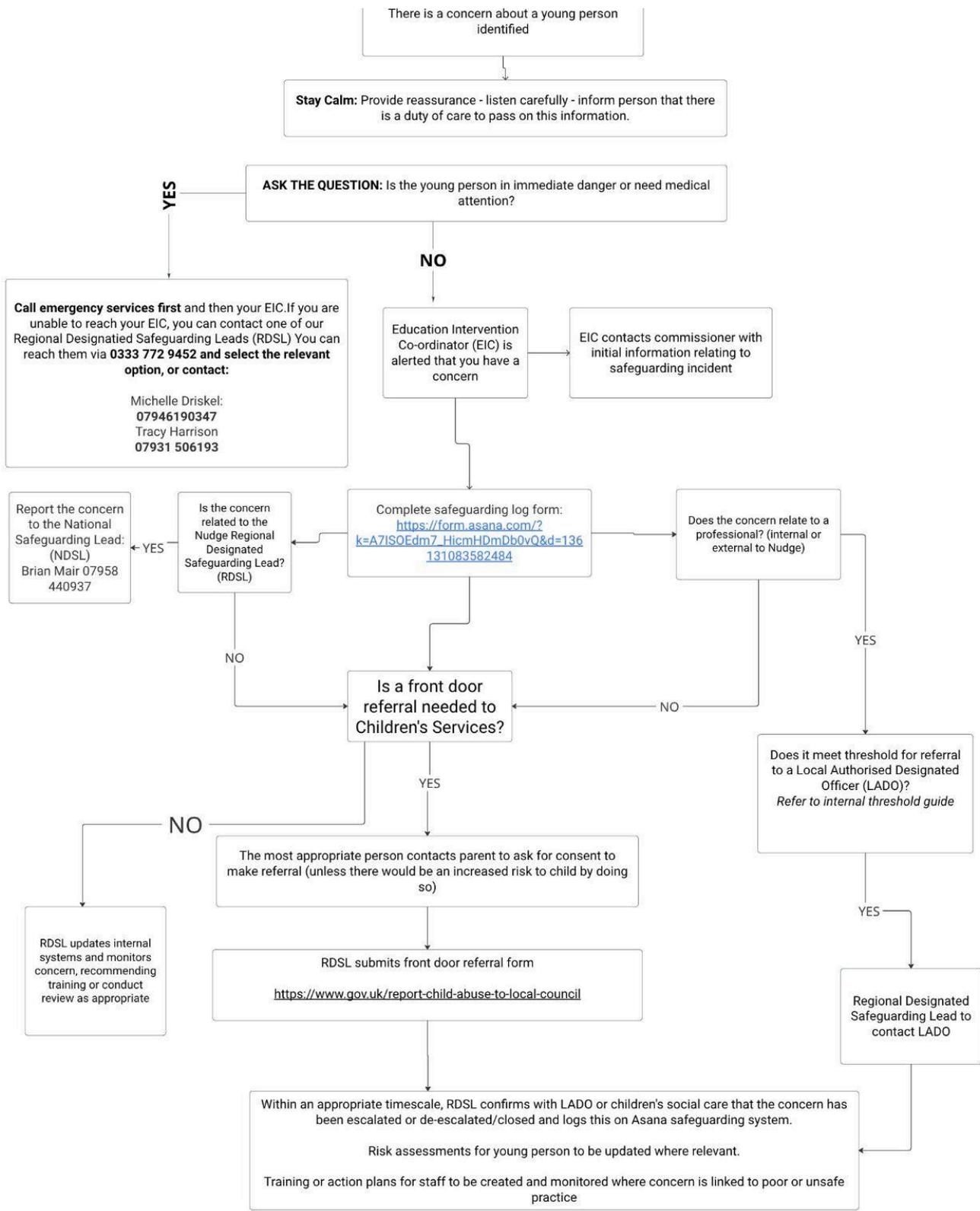
Some useful resources that we would refer to would regarding contextual safeguarding listed below:

<https://www.contextualsafeguarding.org.uk/>

<https://learning.nspcc.org.uk/news/2019/october/what-is-contextual-safeguarding>

*Annexes are located on subsequent pages*

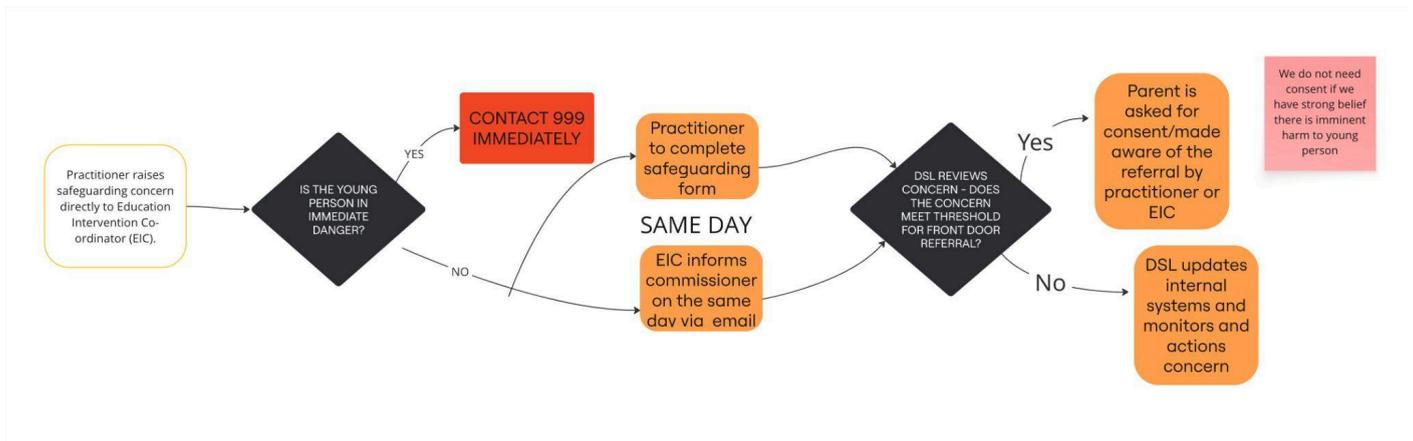
## ANNEX A: Safeguarding Flowchart



National Guidance, Click link or search for "Working together to safeguard children"



## Practitioner Simple reporting process:



## ANNEX B: Process to follow in incident of direct disclosure

## IF A YOUNG PERSON CHOOSES TO SPEAK TO YOU DIRECTLY

### DO

- Find a quiet place to hold the discussion **NOT behind a closed door where possible**, taking consideration into guidelines about being alone with a young person
- React calmly so as not to frighten the young person.
- Take what the person says seriously, recognising the difficulties inherent in interpreting what is being said by a person who has for example a speech impairment and/or differences in language.
- Avoid asking leading or direct questions other than those seeking to clarify your understanding of what the person has said. They may be subsequently formally interviewed by the Police and/or Social Care Services and they should not have to repeat their account on several occasions. The first person told may become a witness at court if they have asked/gained direct relevant information.
- Try to reduce any questions you may choose to ask to an **absolute minimum** and concentrate on listening to the person. Questions should never be leading and should only consist of Who ...? Where ...? When ...? What ...?
- Reassure the young person that they are right to tell and are not to blame.
- Explain to them that concerns will have to be shared with someone who is able to act. Do not make promises of confidentiality.
- Make a written record of what has been disclosed at the earliest opportunity.
- Make a full written record of what has been said, heard and/or seen as soon as possible (preferably on the day that the concern/disclosure was first identified/made) using the incident report template.
- Discuss the incident report with the Nudge Education Regional Designated Safeguarding Lead (RDSL):

You can reach them via **0333 772 9452** and select the relevant option.

### OR

Brian Mair (07958440937)  
Michelle Driskel: 07946190347  
Tracy Harrison: 07931 506193 if RDSL if not available,

### DO NOT

- Dismiss the concern
  - Panic or try to resolve the issue yourself.
  - Allow shock or distaste to show.
  - Probe for more information than is freely offered to open questions.
  - Speculate or make assumptions about what may have happened.
  - Make any comments about the alleged abuser.
  - Make promises or agree to keep secrets.
  - Ask the young person or any witnesses to sign your written information as this may be significantly detrimental to any subsequent police investigation.
  - Take photographs of any alleged injuries. Any such recording must only be done by an approved medical or other practitioner, following referral.
- Discuss the issue with anyone other than your allocated case manager and Lead/Deputy Safeguarding Contact

## ANNEX C: Safeguarding reporting procedure guidance for staff

All concerns are taken seriously. Below is an indication of the types of concerns that may appear and the relevant actions to take in each situation. Many of the lower risk concerns may be concurrent or indicative of higher risk concerns so if in doubt, speak to the Regional DSL or Education Intervention Co-ordinator (EIC).

### LOW RISK CONCERNS

To be communicated in weekly report

- Dirty clothes/appearance
- Concerns around cleanliness of home
- Verbal aggression towards Practitioner
- Verbal disclosure of past engagement in risk taking behaviour
- Vandalism - personal and Practitioner's possessions
- Concerns around eating habits
- Concerns around sleeping patterns
- Concerns around lifestyle choices e.g. social choices/personal hygiene/smoking/vaping
- Concerns around unhealthy or negative peer relationships

### MEDIUM RISK CONCERNS

To be communicated on the day via email to commissioner and team around the student

- Absence through refusal
- Absence through illness
- Absconding but student was found during session following absconding guidelines
- Concerns around neglect from parent/guardian
- Physical aggression by young person towards Practitioner(s)
- Verbal aggression to a member of the public
- CPI restraint technique used with young person
- Verbal disclosure of intent to cause harm or engage in risk taking behaviour
- Vandalism of public property
- Concerns around emotional abuse from parent/guardian
- Parent/guardian preventing young person from accessing education

## HIGH RISK CONCERNS

Immediate concerns around immediate safety of young person from themselves, family members, care team, professionals or peers should be escalated to Commissioner “Front Door Service” via phone & email as soon as possible. Also inform the regional DSL

*We will take appropriate action based on advice received through direct communication with the commissioner, via phone or email. Where relevant, we will also liaise with the wider team around the family including social workers, parents or carers, and CYPS (Children and Young People’s Services) practitioners.*

Inclusive but NOT exhaustive:

- Concerns around physical/sexual abuse towards young person
- Concerns around domestic violence
- Concerning bruising/marks on young person
- Suicidal behaviour
- Absconding and young person not found before end of session
- Physical aggression by a young person towards a member of the public during commissioned hours
- Refusal to go home after session

WHO DO WE REPORT TO?

YP LIVING WITH PARENT/GUARDIAN	YP LIVING WITH FOSTER CARER	YP LIVING IN CARE HOME
<p><b>LOW:</b> Weekly Session Evaluation emailed to specified contacts as per individual commission.</p> <p><b>MEDIUM:</b> Same day email to commissioner.</p> <p><b>HIGH:</b> Phone call to commissioner Follow up with email. Alert additional services as required - 999 or Emergency social services number.</p>	<p><b>LOW:</b> Weekly Session Evaluation emailed to specified contacts as per individual commission.</p> <p><b>MEDIUM:</b> Same day email to commissioner and Social Worker.</p> <p><b>HIGH:</b> Phone call to commissioner and social services. Follow up with email. Alert additional services as required - 999 or Emergency services.</p>	<p><b>LOW:</b> Weekly Session Evaluation emailed to specified contacts as per individual commission.</p> <p><b>MEDIUM:</b> Same day email to commissioner and Social Worker.</p> <p><b>HIGH:</b> Phone call to commissioner and social services. Follow up with email. Alert additional services as required - 999 or Emergency services.</p>

## ANNEX D: Expected action taken from all staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents/carers when they become involved. For example, do not use the word perpetrator, this can quickly create a 'blame' culture.

In all cases of child-on-child abuse it is necessary that all staff talk to young people and instigate immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters. Support on how to do this can be sought from Regional DSLs, and Assistant Regional Leads

- Gather the Facts: gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning, but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)
- Consider the Intent: begin to risk assess. Has this been a deliberate or contrived situation for a young person to be able to harm another?
- Decide on your next course of action

If, from the information that you gather you believe any young person to be at risk of significant harm you must report this to your nominated Education Intervention Co-ordinator (EIC) or Regional DSL for the region if you cannot get in touch with Education Intervention Co-ordinator, who will make a safeguarding referral to the commissioner, and if necessary, Social Services immediately. Where a crime has been committed, the police should be involved also. If this is the case, once the commissioner has been contacted and made a decision on what will happen next then you will be informed on your next steps.

The Regional DSL will review all safeguarding reports.

If Social Services and the police intend to pursue this further they may ask to interview the young people in education It is important to be prepared for every situation and the potential time it may take.

Points to consider:

### **What are the ages of the children involved?**

How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however, should not be overlooked if other issues arise (see following).

## **Where did the incident or incidents take place?**

Was the incident in an open, visible place to others? If so, was it observed? If not, is more supervision required within this particular area?

## **What is the young person's own understanding of what occurred?**

Does the young person know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have an understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care.

## **Repetition**

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered, has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

## **Next Steps**

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

## **If it has been the young person who has been harmed**

What support they require depends on the individual young person. It may be that they wish to seek counselling. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people as a focus on the intervention that is being delivered by Nudge Education.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst on an intervention with Nudge Education so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

## **If it was the young person who has displayed harmful behaviour**

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have harmed themselves in a similar way. In such cases support such as counselling may also be necessary. Particular support from identified services may be necessary through a

CAF/strengthening families/early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, Nudge Education may help facilitate a restorative justice exercise at the request of the commissioner. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in 1:1 work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service).

Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean increasing the staffing ratio of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

### **After-care**

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

### **Preventative Strategies**

It is important to develop appropriate strategies in order to prevent the issue of child-on-child abuse rather than manage the issues in a reactive way. This will be done by thorough ongoing assessment and feedback involving all appropriate professionals and stakeholders.

- Firstly, recognition that child-on-child abuse can occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in order to support young people to talk about any issues and through sharing information with relevant staff.
- Nudge Education has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This can be strengthened through strong and positive PHSE/SMSC activities and projects that tackle such issues as prejudiced behaviour and gives children an open forum to talk things through. With the UK Government making it compulsory to teach young people about Relationships Education for primary-aged children and Relationships and Sex Education (RSE) for secondary-aged children from September 2020 ([Guidance Document here](#)), it will be at the heart of our interventions to ensure that young people have relevant opportunities to learn and discuss relationships and sex in an open forum to ensure that respect and understanding is fostered. Should any safeguarding concerns arise as a result of these conversations, relevant stakeholders will be informed, should it be judged that the young person will not be put at further risk of harm by doing so.

- To enable such an open and honest environment it is necessary to ensure the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another. In order to create such an environment, it is necessary for all staff to be trained and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.
- It is important that signposting is available to young people in the event that they don't feel confident raising an issue to staff or a peer. It is useful to have a resource board with support services on a wide range of issues so young people can seek their own solutions should they wish to. In the same way external services or support programmes could be brought in to talk to young people about specific issues in support of the prevention of child-on-child abuse.
- Finally, it is useful to ensure young people are part of changing their circumstances and that of the procedures within communities and the wider environment.

## ANNEX E: Children Missing Education Process

As an organisation that aims to serve children that are chronically disengaged from education, our thresholds for what constitutes 'missing from education' differs from schools and statutory settings, however, as part of a team of stakeholders that are working to safeguard children from harm we take any intervention that we are unable to secure engagement very seriously.

We have taken best practice examples from existing commissioner policies as well as Government Guidance: [Children Missing Education](#) and [Missing Children and Adults Strategy](#)

We find there are several reasons why a child would persistently be absent from our sessions:

### **SAFEGUARDING CONCERNS**

Non-attendance to sessions may be a warning sign of safeguarding concerns such as neglect, abuse or exploitation. Where we are unable to physically see or speak with a young person for two calendar weeks, then a safeguarding concern should be raised unless we have prior information from a commissioner or appropriate person (e.g youth justice, CAMHS professional) confirming this would be unnecessary. In this instance, the process in Annex A as per any safeguarding concern would be followed.

### **PARENTAL SUPERVISION/ENGAGEMENT**

Where we can ascertain that non-engagement is due to parental engagement and we do not feel that this is a safeguarding concern the following process would be followed:

1. Education Intervention Co-ordinator (EIC) to report non-engagement and attendance to the commissioner.
2. Where advised, we will also reach out to the relevant Children Missing Education(CME) officer in the Local Authority.
3. We will work with parents/carers to help promote positive modelling of the education intervention process.

### **CHANGE OF ADDRESS**

This is particularly common where we work with Looked-After Children (LAC) or those with known, live safeguarding concerns.

Where we are unable to access a young person at the registered home address for two consecutive sessions, or where we find out that the young person address has changed, we will:

1. Collect new address where possible and collect name and contact details of person who gives us this information and pass this on to the commissioner.
2. Check with the commissioner that they have updated information which would allow us to continue the intervention.
3. If neither Nudge Education or the commissioner has the updated address information, we will follow the commissioner's Child Missing Education policy.

4. If we are able to continue with current practitioner then this will be arranged, if the child has moved out of the local area, online support will be offered until we can find a new member of staff, should this support be needed.