



Safeguarding Policy 2025-2026

Commissioning and oversight of Bay Learning Academy as an Alternative Provision

The use of Bay Learning Academy as an AP is commissioned and overseen in line with the requirements of KCSiE 2025 (Para. 168-171 and 331) DfE statutory guidance 'Arranging Alternative Provision A Guide for Local Authorities and Schools, Feb. 2025' - [AP Guidance Feb 2025](#)

Commissioning schools, using Bay Learning Academy, communicate to the LA, the details of any commissioning of AP for their pupils.

The process of commissioning, structured and robust ongoing monitoring and review, ensures that Bay Learning Academy is good quality, safe, delivered by high quality staff with suitable training and experience and meets the needs of the pupil.

The commissioning school retains overall responsibility for safeguarding, attendance, progress, well-being and outcomes of any pupil placed at Bay Learning Academy. This includes written confirmation of safer recruitment practices.

Our Designated Safety Team

Designated Safeguarding Lead – Leila Goring

Deputy Designated Safeguarding Lead – Sam Watson

Director of Safeguarding – Kelly Foley

CLA and VCET Designated Teacher – Leila Goring

SEND Lead – Leila Goring

Online Safety Lead (including Filtering & Monitoring) – Eleanor Goring

Learner Welfare Lead (including Anti-bullying) – Lee Morgan

Preparation for Adulthood – Nicky Thompson

First Aid Officers – Sammi Wainwright, Sam Watson, Nicola Thompson & Jodi Foston

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Purpose and Aims of this policy

Purpose

The primary purpose of our AP safeguarding policy is to document our approach protecting children from harm and promote their well-being. It outlines procedures in place at Bay Learning Academy for identifying preventing and responding to various forms of abuse, neglect, exploitation and other risks that could negatively impact on a child's safety and development.

We are committed to maintaining a safe environment where children can thrive without fear of neglect, physical, emotional or sexual harm or exploitation. We know that children who feel safe and secure at Bay Learning Academy are more likely to achieve their full potential.



We will be alert to the signs of all types of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support and protection as soon as concerns are identified – providing the right level of support at the right time.

Aims

Our aims are based around the guidance from KCSiE 2025, which defines safeguarding and promoting the welfare of children 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
- Taking action to enable all children to have the best outcomes

Working Together to Safeguard Children (2023) further extends this definition to include:

- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

Children's welfare is of paramount importance at Bay Learning Academy. As a result, we will establish and maintain support structures and an ethos where children feel secure and are encouraged to talk openly, have trusted adults available and are listened to and feel reassured. Children at Bay Learning Academy will be able to talk freely to any member of if they have worries or concerns.

We also recognise the importance of working positively with parents and carers and offering support and guidance to families during difficult times in their lives.

Everyone who works with and supports our children and their families has a role to play in safeguarding children. We recognise that staff at our AP (including third party agency staff, Directors and volunteers), play a particularly important role as they can identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members will always act in the best interests of the child.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to concerns shared by a child and how to record and report this information. Staff are unable to provide a commitment of confidentiality when information and concerns are shared and will explain how information will be shared, with who, the reason for this and what will happen next. Staff are aware that there are a broad range of specific, and at times interlinked safeguarding / child protection issues, which require vigilance and may need potential action for example, early help support (as outlined in KCSiE 2025, Para. 18) These concerns can occur 'direct / in person' and / or online and straddle within the family and outside of the family settings. (or both). Similarly concerns can arise in or outside of Bay Learning Academy. The nature, extent and significance of the specific concerns will determine the decision making by the DSL / DDSL and subsequent action taken



At Bay Learning Academy, we recognise the need to give special consideration to those children with Special Educational Needs and/or disabilities, those who are looked after or previously looked after by the local authority, and those who have a social worker, recognising that additional barriers can exist for this group of children. Additionally, we are aware of the, often interlinked, vulnerabilities, that some of our pupils face and will work to identify and support / minimise these.

Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our children to develop essential life skills.

At all times we will work in partnership and endeavour to establish effective working relationships with colleagues from other agencies, parents, carers and in line with Working Together to Safeguard Children (2023) and ERSCP local procedures.

Roles and Responsibilities

DSL and DDSL

A full outline of the role and responsibilities of the DSL can be found in KCSiE 2025, Annex C. In accordance with this, the DSL is a member of the SLT and holds overarching responsibility for ongoing oversight of safeguarding and child protection policy and procedures (including online safety and IT filtering and monitoring). This covers record keeping, coordinating staff training and briefings and ongoing staff awareness and an approach to maintaining a culture of vigilance.

During term time, the DSL or DDSL (or another appropriately trained senior staff member) will be available on site when the AP is open to coordinate support, advise staff, or respond to safeguarding concerns and child protection issues. Bay Learning Academy will ensure that there is adequate and appropriate cover arrangements for any out of hours / out of term activities. The DSL will lead on multi-agency working and have oversight and coordinate any referrals made by the AP.

While the activities of the DSL may be shared and delegated (e.g. to the DDSL and within the pastoral structures), the ultimate lead responsibility for safeguarding and child protection remains with the DSL and will not be delegated.

The DSL will ensure that individual staff members are informed of actions taken in response to concerns they have reported to the DSL. If a staff member feels that the actions are inappropriate, ineffective, or that the concern persists, they should raise these concerns with the DSL or a senior staff member and request reconsideration or discussion. If the staff member still has concerns or considers the situation urgent, they may seek guidance from SiET, SaPH or the LADO.

The DSL will work with the DSG to ensure that the Governing Body are informed and able to retain appropriate strategic oversight of all safeguarding.

To develop the necessary knowledge and skills for their role, the DSL will undertake appropriate and specific training; the same applies to the DDSL. Training to develop and maintain skills and knowledge will be regularly updated, in accordance with local ERSCP protocols, SiET recommendations and as required by statutory and non-statutory guidance. Training will be completed and refreshed through various methods, at regular intervals and at least annually.



Directors and Leadership

The Directors fully recognise their responsibilities regarding safeguarding and child protection and promoting the welfare of children as outlined in KCSiE, 2025, especially Part Two. The Directors have the strategic responsibility to monitor and ensure that all child protection arrangements, procedures, policies, and training are in place and effective. Safeguarding will be an agenda item on every full Directors meeting, and any relevant reports on the operation of safeguarding / child protection across the AP are provided and considered.

The Directors will allocate a specific Director to have oversight of and support Safeguarding (DS) and a staff lead for Filtering and Monitoring.

Management and leadership by the Headteacher and Directors ensure that the time, resources, and training are adequate to ensure that the DSL responsibilities, as outlined in KCSiE 2025, are carried out and that all strategic child protection and safeguarding arrangements are in place and effective.

The Directors will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart and will facilitate and maintain safeguarding.

All Staff

It is recognised that staff play a key role in safeguarding as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. All staff at Bay Learning Academy understand that they have a professional, moral, and legal responsibility to safeguard and promote the welfare of children. Staff are aware of their responsibilities in relation to Whistleblowing, Bay Learning Academy Code of Conduct and Low-level concerns and will support a culture of ongoing vigilance.

This includes a responsibility to be alert to the various child protection / safeguarding issues outlined in KCSiE, 2025 (Part One and / or Annex A and Appendix 3 of this Policy) and associated indicators of, for example, abuse, neglect, exploitation, violent extremist radicalisation, sexual violence, and sexual harassment, and to record and report concerns immediately to staff identified with child protection responsibilities within the AP. Staff will be briefed and undertake training as appropriate to ensure that safeguarding duties are understood and can be fulfilled.

Staff are 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 being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

In line with existing and relevant policies, for example, Staff Code of Conduct and student Behaviour Policy, staff will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication.

Children and Young People

Through the maintenance and communication across Bay Learning Academy of a robust and effective safeguarding culture and procedures, every effort will be made to ensure that every child will:

- feel safe, be listened to, and have their wishes and feelings considered
- confidently report concerns and abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback



- contribute to the development of safeguarding policies and practice
- receive help from a trusted adult
- learn how to keep themselves safe, including online and out of school

Parents and Carers

At Bay Learning Academy we believe that our safeguarding work will be more effective if it is carried out in partnership with parents and carers and that preventative and supportive strategies are most effective. To this end we will offer support and where appropriate help facilitate access to universal support services and pastoral support structures. This will be underpinned by open and honest communication and transparency in terms of purpose, always working in the best interests of the child. Where appropriate we will, in agreement with parents / carers, seek support from Family Help School and Community Team to progress preventative / early help assistance (See Section 8).

However, we ensure that parents are aware that there may be certain circumstances and rare occasions when we need to progress concerns in relation to child protection and seek advice, without parental / carer consent or knowledge.

Training

The DSL, supported by the DS and Headteacher, will oversee the staff safeguarding induction and training program to ensure that all staff working at Bay Learning Academy have completed the level of training appropriate to their role and that this is refreshed at required intervals (for example every 2 years for Prevent). The DSL will make reference to the SiET training guide and ERSCP requirements to guide the oversight of training. All training will be recorded centrally and regularly reviewed to ensure that any 'refresher' training requirements are met.

The staff safeguarding training induction program will run across the whole school year and holidays and all is applicable to all appointments during this period.

All Staff

All staff working at Bay Learning Academy will complete training in line with their designated role and a record of this will be maintained as evidence. All staff members will undertake safeguarding and child protection training at induction, including on Whistleblowing / Low-level Concerns procedures and Online Safety. This will ensure staff understand Bay Learning Academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect and exploitation.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of a safeguarding approach and wider staff training, and curriculum planning
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the 'Teachers' Standards' to meet the expectation of all teachers in terms of responsibilities and professional conduct
- Cover the government's anti-radicalisation strategy, Prevent, to enable staff to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas



- Staff will also receive regular safeguarding and child protection updates throughout the year (for example, through emails, e-bulletins and staff briefings) and at least annually through staff inset training

The DSL and DDSL

The DSL and DDSL will undertake specific DSL child protection and safeguarding training at least every 3 years.

In addition, they will update their knowledge and skills at regular intervals (for example, through SiET newsletters, meeting other DSLs, or taking time to read and digest safeguarding developments).and at least annually through the SiET Annual DSL Briefing. Training will be undertaken in line with the SiET training guide and recommendations of the ERSCP. This will ensure that more specialist knowledge is developed to fulfil the broad safeguarding remit of the role(s).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Directors

All Directors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities and provide strategic challenge and oversight
- It can be assured that safeguarding policies and procedures are effective and support the AP to deliver a robust approach to safeguarding
- Directors may be required to act as the 'case manager' if an allegation of abuse is made against the Headteacher, members of the Governing Body will have access to support and training in managing allegations for this purpose

Volunteers

We do not have volunteers that have contact with the learners.

Opportunities to Teach Safeguarding

Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that children have a range of age-appropriate contacts and strategies to ensure their own protection and that of others. We recognise that Bay Learning Academy play an essential role in helping children to understand and identify what is appropriate child and adult behaviour, including what is 'safe' for themselves and others and how to seek advice and support when they are concerned.

As part of our curriculum Bay Learning Academy teaches about safeguarding, including online safety and healthy relationships – '*Relationships Education, Relationships and Sex Education (RSE) and Health Education*' - for teaching up to 31.08.26. [RSE RSHE Guidance](#)



and recognises that effective education is tailored to the specific needs and vulnerabilities of individual children including children who are victims of abuse and children with special education needs or disabilities.

We recognise that Bay Learning Academy plays a crucial role in preventative education, in the context that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. We have a clear set of values and standard which are upheld and demonstrated throughout all aspects of school life. They are underpinned by Bay Learning Academy behaviour expectations and policy and pastoral support system, as well as by a planned programme of effective PSHE delivered and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate (particularly when considering the needs of children with SEND and other vulnerabilities). Where we invite external organisations and/or visitors to enrich our safeguarding curriculum, we ensure that we review the educational content to ensure it is age appropriate and has educational value.

Specific Safeguarding Concerns

Part One and Annex B of KCSIE 2025, provide further information on the types of abuse and a range of specific safeguarding issues.

All staff are made aware of the possible indicators of abuse, exploitation and neglect and how to respond to concerns and allegations and any information shared by children, following Bay Learning Academy safeguarding procedures. Staff are aware that some children will have an increased risk of abuse, both online and in person and in and out of Bay Learning Academy, as listed below.

Physical, Emotional, Sexual Abuse and Neglect

Please see Appendix 3 – Categories of Abuse, Neglect and Exploitation, for further information. When assessing Neglect, consideration will be given to using the ERSCP Neglect and Environment Screening Tool document to structure analysis of concerns - [NEST](#). When there are potential concerns around Exploitation, consideration will be given to using the Risk Indicator Tool - [RIT Tool](#)

Child-on-Child Abuse

All staff are aware that children can abuse other children and that this can happen inside and outside of Bay Learning Academy and online. It can be an isolated incident or part of a pattern and may involve, power imbalance, intent and repetition. A distinction will be made between child-on-child abuse and lower level peer conflict, to ensure there is an accurate portrayal of the prevalence of both within Bay Learning Academy. All staff are aware of the different types of child-on-child abuse and the indicators, which include, but are not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between children
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Emotional abuse – deliberate unpleasantness, name calling, scapegoating, humiliating etc
- Sexual violence and sexual harassment



and/or

- Consensual and non-consensual sharing of nudes and semi-nude images videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Staff are aware that 'upskirting' behaviour is a criminal offence and must be reported as such to senior staff as a form of sexual harassment.
- Initiation/hazing type violence and rituals

Bay Learning Academy recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported or identified.

As such, it is important that staff are vigilant and speak to the DSL (or DDSL) about any concerns regarding child-on-child abuse – observed or reported.

All staff are aware of their responsibility to model appropriate behaviour and the need to report any concerns around staff behaviour (in or out of Bay Learning Academy) to the DSL who will act appropriately to ensure this is investigated, acted upon and any support required is delivered (see Section 13).

All staff will routinely challenge inappropriate behaviour as part of a 'zero tolerance' of child-on-child abuse. In this way, any potential for such behaviours to become tolerated, normalised or dismissed will not be realised. In line with this, staff will encourage students to share any concerns, confident and safe in the knowledge that this will be taken seriously, and concerns acted upon and support provided. This may involve utilising the Bay Learning Academy Behaviour Policy and sanctions where appropriate. Students are aware of how to share concerns in confidence – referring to their learner handbook.

Bay Learning Academy RSE/RSHE curriculum supports the inclusive ethos of Bay Learning Academy and allows children to identify this type of abuse, reinforces that this is not acceptable in anyway and supports children to seek help should they require it. This represents a key aspect of teaching safeguarding, maintaining an effective safeguarding culture and preventative approach to safeguarding.

Concerns about children's behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with children involved and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing policies, for example anti-bullying, acceptable use of IT, behaviour and child protection policies.

If there is a concern that the level of possible abuse may reach a threshold for Police and or Children's Social Care involvement or that either the alleged victim or perpetrator should be offered support or intervention from the Early Help Hub, appropriate contact and Request for Service documents (if needed) will be made in-line with local safeguarding procedures.

In cases of possible Hate Crime, a separate referral will be made to the Humberside Police Hate Crime reporting system Humberside Police Online Reporting Hate Crime - [Humberside Police Online Reporting Hate Crime](#) - or via 101 or online at the ERYC web site - [ERYC web site](#)



This will not prevent or delay Bay Learning Academy in following their own internal disciplinary procedures and/or making a Request For Service - [Request for Service](#) - to SaPH if this is required.

If an incident has occurred during the school day or is occurring, that is clearly an urgent criminal matter, 999 must be called.

Where any child involved in child-on-child abuse is an open case to partner agencies, the lead professional will be updated, and Bay Learning Academy will share information with and take advice from these agencies. This will include the status of any investigation, supervision, forward planning and details of any Police involvement. Bay Learning Academy will make every effort to ensure that during such investigations all children involved are treated fairly and consistently and that appropriate supervision and support is in place. Parents will be made aware of any specific arrangements that are put in place. Every effort will be made to minimise disruption to the education of all involved.

Whilst it is important that Bay Learning Academy does not assume guilt without clear evidence or direction from other agencies, it is important to ensure that the victim or alleged victim is fully protected and supported throughout the process.

In circumstances where a child may present a risk to peers or staff, appropriate Risk Management plans will be developed with appropriate advice from other agencies. These plans will be discussed with staff on a need-to-know basis and the child and parents/carers.

Child-on-Child Sexual Violence and Harassment

When responding to concerns relating to child-on-child sexual violence or harassment, the guidance outlined in Part five of KCSIE 2025 will be followed, along with the SiET '*Guidance to school and education settings for managing incidents of Inappropriate Sexual Behaviour(s), Sexual Harassment and Violence*'.

It is recognised that sexual violence / abuse and sexual harassment are never acceptable and can happen anywhere, and all staff will maintain an attitude of 'it could happen here' and that sexual violence and sexual harassment can occur between two children of any age and sex.

Bay Learning Academy adopts a 'zero tolerance' approach to such behaviours. It is recognised that it can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face-to-face (both physically and verbally), potentially in and out of Bay Learning Academy.

A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or ever be made to feel ashamed for making a report. All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

Abuse that occurs online or outside of Bay Learning Academy will not be dismissed or downplayed and will be treated equally seriously and in-line with relevant policies/procedures, for example anti-bullying, behaviour, child protection and online safety.

Regarding the law, it will be explained that the law is in place to protect children and young people rather than criminalise them. This will be done in such a way to avoid creating alarm or distress.



Staff recognise that an initial allegation or sharing of a concern to a trusted adult may only be the first incident reported and could be part of a pattern of previous and ongoing incidents rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation and identity.

Any concerns should be shared immediately with the DSL (or DDSL) who is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response:

The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in-line with Part Five of KCSIE 2025 and relevant local/national guidance and support.

The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all students and staff and any actions that are required to protect them.

The consideration of concerns involving an online element will take place in accordance with relevant local/national guidance and advice.

Reports will initially be managed internally by the DSL and where necessary advice sought and information shared with partner agencies (SaPH, Police, Family Help etc.).

Important considerations which may influence this decision include:

- the ages of the children involved
- the developmental stages of the children involved
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature
- any other related issues and wider context, including any links to child sexual exploitation (CSE) and child criminal exploitation (CCE)
- whether there are any ongoing risks to the victim, other children, or staff
- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour - [Harmful Sexual Behaviour](#) - has been displayed
- any power imbalance between the children
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.

Routinely and in most instances, the DSL will engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence and / or harassment; but this decision making will be on a case-by-case basis.



The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk.

Any information shared with parents/carers will be in line with information sharing expectations, Bay Learning Academy confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social care and/or the Police) to ensure a consistent approach is taken.

If at any stage the DSL is unsure how to proceed, advice will be sought from the either / or the Safeguarding in Education Team, the Family help School and Community Team and / or SaPH.

Honour Based Abuse (HBA)

All staff are reminded of the need to be aware of such abuse as outlined in Part 1 and Annex B of KCSiE 2025, and the statutory duty and responsibility to report concerns related to FGM - [Female Genital Mutilation](#).

So-called 'Honour Based Abuse' (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, Forced Marriage, and practices such as Breast Ironing.

All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to as child protection concerns and in-line with Bay Learning Academy and local safeguarding arrangements. Staff will report any concerns about HBA to the DSL (or a deputy) who will consider a contact to SaPH. If there is an immediate threat or risk of abuse, the Police will be contacted via 999.

Whilst all staff will speak to the DSL (or DDSL) regarding any concerns about Female Genital Mutilation (FGM), there is a specific legal duty on Teachers:

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police and will be supported by the DSL in doing so.

FGM Reporting Procedure

The following reporting procedures in-line with ERSCP / Humberside Police agreed arrangements should be followed in case of possible or alleged FGM. However, if there is a suspicion that a girl is at immediate risk of such abuse, Police should be contacted via 999.

If a member of staff suspects that a girl has suffered or may be at risk of suffering FGM or subject to Forced Marriage, they must discuss these concerns with the DSL immediately. The DSL will follow ERSCP procedures and contact SaPH by phone using the Immediate Concern line.

The DSL or Teacher will follow advice from SaPH before discussing such concerns with parents or carers.

If a member of staff discovers from the victim, or peer or other source, or physical evidence (which is highly unlikely for a member of Bay Learning Academy staff) that FGM has taken place. The DSL must be informed immediately and should contact the Police and then SaPH using the 'Immediate Concerns' line..

In this case, if the member of staff is a teacher (or employed to carry out teaching duties) the referral to Police and SaPH will be made by this teacher with the guidance and support of the DSL. For other staff such a referral will be made by the DSL, but this will need to identify the member of staff and the information they have reported.



The written Request for Service should be made immediately.

If the DSL or Deputy DSL is not available within this timescale, the member of staff should contact SaPH and update the DSL.

A written 'Request for Service Form' should be forwarded to SaPH in-line with ERSCP safeguarding procedures.

Minimum Age for Marriage

Staff are aware of the law change that came into force in February 2023. This made it 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.

Contextual Safeguarding

All staff will be made aware of the need to consider that wider aspects of the child's life beyond the family situation may place their safety and welfare at risk. This is particularly important in respect of potential exploitation, which remains a significant and ongoing safeguarding concern.

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

Staff are made aware of the possible indicators of CSE and CCE and the need to refer these concerns to the DSL. All staff have received and been given time to read KCSiE 2025 Part One and have access to Annex B: Further information. Any concerns will be referred to SaPH in order that the LA can consider this information in-line with the '*ERSCP Effective support for children, young people and families in the East riding of Yorkshire*' - [Effective Support guidance](#)

It is recognised that both CSE and CCE are forms of abuse and exploitation that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. Routinely, this will be in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Staff are aware that children can become trapped by such exploitation as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims; despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys and that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE). Staff recognise that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16 and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example, they may believe they are in a genuine romantic relationship.



County Lines

Staff are aware that the exploitation of children to be used to carry drugs and money from urban to suburban, rural, market and seaside towns, is a growing problem and that the East Riding is an area that is targeted.

Where there are concerns in relation to any type of potential exploitation of children, Bay Learning Academy will consider completing a Risk Indicator Tool - [RIT Tool](#) – to help assist in profiling concerns and also seek support / advice From the Making a Change Team. Concerns in relation to exploitation will be considered as potential child protection issues and dealt with in line with agreed procedures.

Possible Violent Extremist Radicalisation & Hate Incidents

Bay Learning Academy is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 and associated guidance - [2023 Prevent Duty Guidance](#) - to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent Duty and the specific obligations placed upon us as an education provider, regarding risk assessments, working in partnership, staff training, and IT policies.

Staff are made aware that children are susceptible to extremist ideology and radicalisation and staff will be alerted to changes in children’s behaviour which could indicate that they may be in need of help or protection. Concerns about the possible radicalisation of, or influence on children by violent extremist political or religious groups should be referred to the DSL.

If it is felt that there are concerns about possible radicalisation to encourage violent extremism, including online, or concerns about the behaviour of parents or other family members, a referral will be made to the Police - [Police](#) - and Local Authority - [ERYC Prevent](#)

If there is an immediate concern of risk or emergency, the Bay Learning Academy will call 999.

The National Prevent referral form and instructions can be found on the ERSCP web site - [Prevent referral form](#)

This will not prevent or delay Bay Learning Academy in following our own internal disciplinary procedures in such cases.

The RSE / RSHE curriculum will ensure that issues such as tolerance, respect, democracy, and individual liberty are covered in age-appropriate ways.

Bay Learning Academy ensures that potentially controversial issues are discussed and covered within the curriculum and that these are not avoided but dealt with appropriately within the planned and informal curriculum.

Following an assessment of the levels of risk within Bay Learning Academy and wider community, appropriate levels of training will be given to DSL, senior staff, and other staff.

Visiting speakers and organisations will be checked to assess the suitability in respect of the above elements of RSHE / RSE activities within Bay Learning Academy.

Serious Violence

This is a complex area with potential indicators existing across personal, relational and environmental domains, normally in combination when incidents actually occur. All staff are aware of indicators or signs and symptoms that a child may be at risk or have suffered serious violence or be involved in such behaviour possibly related to gang type activities or criminal exploitation. Any concerns regarding serious violence will be reported and responded to in-line with other child protection concerns by speaking with

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the DSL or DDSL. Staff will take any allegations seriously and work in ways that children and keep them safe.

support

Domestic Abuse

Staff understand that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional abuse. Children can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.

If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL (or DDSL).

Private Fostering and Direct Payments

If Bay Learning Academy is made aware that a child under the age of 16 (under 18 if disabled), is or may be cared for by someone who is not their parent or a 'close relative'*; in a private arrangement made between a parent and a carer for 28 days or more, or where the placement is likely to be more than 28 days, a request for service to SaPH will be made.

*Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles, or aunts - whether of full blood, half blood or marriage/affinity

If we are made aware that a direct payments worker is engaged by parents for overnight supervision of children, SaPH will be notified if Bay Learning Academy has concerns about such arrangements.

Mental Health and Emotional Well-being

All concerns in relation to student Mental Health and Emotional Well-Being will be shared promptly with the DSL. Staff are well placed to observe children day-to-day and identify those whose presentation and behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), can impact on their mental health, behaviour, and education.

Bay Learning Academy will arrange support for children with Emotional & Mental Health issues by accessing universal services. If additional support is needed, advice and support will be requested in-line with the 'LA Effective Support' model. The DSL will contribute to planning to provide appropriate support structures in this area.

Violence Against Women (VAWG)

Violence against women and girls (VAWG) encompasses a range of harmful acts, including physical, sexual, and psychological violence, disproportionately affecting women and girls. This violence can occur in various settings, such as within the family, the community, and online. VAWG has significant and long-lasting impacts on victims, affecting their physical, mental, social, and financial well-being



It can encompass Domestic Abuse, Sexual Assault, Stalking, Female Genital Mutilation (FGM), HBA, Street Harassment and Online Harm

VAWG is often underpinned by misogynistic beliefs and attitudes involving the hatred of, contempt for, or prejudice against women or girls. It can also encompass a belief in the inferiority of women or a bias against them. In a broader sense, misogyny can refer to social systems or environments where women experience hostility and hatred simply for being women, particularly within historically patriarchal structures

Staff will be alert to potential indicators and share any concerns with the DSL and the RSHE curriculum will be used to champion tolerance, inclusivity and anti-discriminatory attitudes and beliefs alongside an approach of zero tolerance.

Vulnerable Children and Those Potentially at Risk of Harm

Missing Child

Bay Learning Academy is committed to the safety and welfare of all learners at all times. If a child's whereabouts cannot be accounted for during the school day, this will be treated as a safeguarding emergency. Staff must act immediately to locate the learner by checking the site, contacting staff and peers, and notifying a member of the Senior Leadership Team and the Designated Safeguarding Lead (DSL). If the learner cannot be located promptly, parents or carers will be contacted and, where appropriate, the police will be informed. All incidents will be recorded and reviewed to identify any patterns or risks.

Children with a Social Worker

Bay Learning Academy will work closely with Vulnerable Children Education Team (VCET) Strategic Lead for the Education of Children with a Social Worker and the Virtual School Headteacher and pay due regard to meeting the requirements of relevant statutory and non-statutory guidance.

The DSL will maintain records and details of children who have a Social Worker and also any child in Kinship Care and where information is available, where there has been previous involvement of a Social Worker. The DSL will liaise with Bay Learning Academy staff to ensure relevant information is shared and that there is consistency of approach and support and reasonable adjustments where appropriate.

In turn this will inform decision making and support to promote positive outcomes spanning attainment, progress and well-being, as well as pastoral support and managing any safeguarding concerns (for example responding to any attendance and behaviour issues)

The DSL will ensure that the allocated Social Worker is kept informed and updated and that information is shared promptly to facilitate multi-agency working.

Children who are Lesbian, Gay, Bisexual or Gender Questioning

The Cass Review (2024) identified that caution is needed for any child questioning their gender as there remain many unknowns about the impact of social transition. Bay Learning Academy is mindful of this and as part of a commitment to inclusion there will be a zero tolerance approach to any form of child-on-child abuse and prejudicial / discriminatory behaviours.

Every effort will be made to provide a safe, supportive and inclusive environment for any child who is lesbian, gay, bisexual or gender questioning. It is acknowledged that this is a potentially complex and challenging area that remains under review, pending the publication of revised government guidance.



However in line with the current guidance incorporated in KCSiE 2025, (Para. 204 – school will adopt a cautious approach to supporting a gender questioning child by:

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- Considering the broad range of the individual needs
- Working in partnership with parents (except in the rare circumstances where involving parents would bring significant risk to the child)
- Taking account of any clinical advice available and encouraging parents to seek such help and advice
- Considering how to address wider vulnerability issues such as the risk of bullying, complex psychosocial / mental health / emotional well-being issues and in some cases any SEND factors.

This approach will not detract from support available but will be used to inform and structure decision making.

It is recognised that risk can be compounded when children lack trusted adults with whom they can be open and every effort will be made to reduce the additional barriers faced and create a culture where children can speak out or share their concerns with members of staff. This is supported by the curriculum which prepares children for life in modern Britain and supports Bay Learning Academy value and ethos around inclusivity and tolerance..

Children Looked After (CLA) and Previously Looked After (PLAC) and in Kinship Care

Bay Learning Academy recognises the common reason for children becoming 'looked after' is a result of abuse and / or neglect and that a PLAC and child in Kinship Care can potentially remain vulnerable as a result of past adversity and trauma.

The Designated Teacher who supports and promotes the educational achievement of both CLA and PLAC, working closely with VCET to promote educational achievement and positive outcomes, will liaise with the DSL and staff colleagues to ensure that support is provided and ensure that the needs identified in the child's Personal Education Plan (PEP) are met.

Records of professionals involved will be maintained by the DSL and information shared as required in a timely manner and when requested by VCET.

The DSL and Designated Teacher will work together to ensure staff have the information required to support this cohort and also that staff are aware of and meet the requirement for information to be made available for statutory review meetings.

Attendance - Children with unexplainable and/or persistent absences from education and commissioning and oversight of Alternative Provision

Bay Learning Academy is committed to promoting the highest possible level of pupil attendance and continually tracks, monitors and reviews attendance at an individual pupil level and across identified cohorts within Bay Learning Academy.

This is a recognition of the safeguarding risks associated with poor attendance (for example neglect and child sexual and criminal exploitation). The robust approach to attendance monitoring will support the identification of such abuse and may help prevent the risk of concerns escalating and children going missing in the future. It is also an acknowledgement of the negative impact upon well-being and personal development, engagement with learning and progress that poor attendance leads to.



Accurate and up to date contact details of a minimum of one contact will be maintained and this information used to facilitate communication in the event of concerns. There is a Bay Learning Academy Attendance Policy that clearly documents procedures and expectations in relation to attendance and communicating absences to the referring school or LA.

If a child absconds from the site, Bay Learning Academy will make an initial search and contact the parent / carer or other emergency contact (and Social Worker if open to CSC). If after that search, the child is not located, Bay Learning Academy will contact the Police within 20 minutes of the alert or sooner in extreme circumstances.

Children with SEND

Staff are reminded that children with SEN, disabilities, communication, or behaviour problems are at greater risk of abuse, neglect and bullying than other children. They may not be identified as being at risk of harm as indicators of possible abuse such as behaviour, mood, and injury may be assumed to be related to disability or SEN rather than possible abuse, neglect or bullying and communication of abuse may be difficult. Staff specifically supporting such children and other staff will be alert to these factors. As such, all members of staff are encouraged to appropriately explore potential indicators of abuse and exploitation such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviour's such as bullying, without outwardly showing any signs.

Family Help (providing Early Help)

Family Help means providing support as soon as a problem emerges at any point in a child's life, for children of all ages. Providing Family Help is more effective in preventing escalation of concerns and promoting the welfare of children than reacting later. It can improve a family's resilience and outcomes or reduces the chance of a problem getting worse. Staff will be alert to the potential need for Family Help and share any concerns that may indicate this would be of benefit to a child / family and seek consent to do so. Bay Learning Academy staff are aware of the range of issues identified in KCSiE 2025 (Para. 18) that if identified should prompt consideration of the potential need for a preventative / early help approach / Family Help.

Child Protection Procedures

Identifying Concerns

Bay Learning Academy staff are particularly well placed to observe and be alert to indicators of abuse and neglect and the various forms of exploitation and risk, any changes in behaviour or poor or unexplained and/or persistent absences from education. Risk, abuse, and exploitation can occur in and out of the education setting, in person and online.

Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2025, outline the definitions and indicators of abuse, exploitation and neglect and all staff are made aware of this. The DSL and DSG ensure that all staff have received and been given the time to read, Part One or Annex A of Keeping Children Safe in Education 2025 and have access to the full guidance and 'Further Information' contained in Annex B.



Further advice and guidance outlining local protocols is contained in the ERSCP

document – *'Effective support for children, young people and families in the East Riding of Yorkshire.'*

When concerned about the welfare of a child, staff will always act in the best interests of the pupil and staff will maintain an attitude of 'it could happen here' where safeguarding is concerned.

A child centred approach will guide support and a child-specific issues will always be considered as it is recognised that some children have additional or complex needs and may require access to intensive or specialist services to support them. The DSL will liaise with appropriate colleagues.

Safeguarding incidents and/or concerns can be associated with factors, exploitation and risks outside the family, home, and education setting. 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, sexual abuse, serious youth violence and county lines.

Indicators of child abuse, exploitation and neglect can vary from child to child and concerns may arise in many different contexts, from a variety of sources and can vary significantly in terms of nature and seriousness. Children develop and mature at different rates, as such it is necessary to locate concerns and behaviour's on a developmental continuum – i.e., what appears to be worrying behaviour for a younger child might be normal for an older child.

Technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.

Responding to Concerns

All staff understand that they have a responsibility to respond to information and concerns shared by pupils or other concerns and pass these concerns on to the DSL immediately.

Staff do not need 'proof' of abuse, exploitation or neglect and should not 'investigate' concerns.

This information must be recorded on Compass MIS

Concerns relating to marks or injuries must also be recorded on a 'Body Map'. If using a body map, injuries or marks must be described, in addition to locating on the body map. The body map is located on Compass MIS.

Photographs must not be taken of any marks or injuries, unless specific advice from SaPH is given to this effect.

Staff are briefed on procedures and regularly reminded to maintain an 'It could happen here' attitude and not to dismiss concerns or allegations as insignificant. The approach of staff will be informed by consideration of the following:

- information and concerns may provide a vital link to other information
- concerns must be shared with the DSL immediately or as soon as possible – this is prioritised
- investigation or seeking proof should not take place as this is the role of the DSL / DDSL
- not promising secrecy to children or adults making allegations or sharing concerns but reassure them that information will be shared appropriately and confidentially
- to avoid closed questions that lead a child into a particular answer but if they need to clarify aspects of an allegation or concerns shared by or about a child use only 'TED' type questions (i.e., Tell me – Explain - Describe) – also See Appendix 4

The DSL will lead on the consideration and decision making in terms of the response required. They will include consideration of the most appropriate response, depending upon the level of concern:

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and

- Contacting parent / carer to gain consent and more information – if feasible and safe
- Considering if school / universal service can support the situation
- Contacting the allocated worker from the Family Help School and Community Team
- Contacting SIET
- Using the SaPH 'Immediate Concerns' line
- Submitting a Request for Service to SaPH or Early Help (with consent)
- Contacting SaPH and asking to speak directly to an Advanced Social Worker

Staff are made aware that it is unacceptable legally, professionally and morally for any member of staff to keep such concerns to themselves, including concerns about the conduct of another member of staff and that any such failures will be regarded as potential disciplinary matters.

Each case will be considered by the DSL who will decide what information to share with which staff and how to progress communication and information sharing with parent / carer and partner agencies.

The DSL will acknowledge receipt of any concerns and provide an update on progress.

Children Suffering or at Risk of Suffering Significant Harm – Immediate Concerns

Immediate consideration will be given to contacting the Police using 999 if it is believed it is an emergency situation and a child is at immediate risk of or experiencing significant harm.

Prior to contacting SaPH, efforts will be made to contact parent / carers to share that Bay Learning Academy will need to discuss the matter with the SaPH. Every effort will be made to communicate openly and honestly with parents and gain consent to share information.

However, this may not be the case if it is thought that:

- Informing parents/ carers might place the child at continued or increased risk.

and/or

- There is a possibility that a crime may have been committed.

and/or

In cases of suspected fabricated illness, radicalisation, FGM or Forced marriage.

and /or

- Informing parents/ carers might place staff at risk.

When a delay in obtaining consent may put a child at risk, contact to SaPH will be made before discussing the matter with parents or carers and advice sought. This will be done by using the SaPH 'Immediate Concerns' line

In any case this will be done as soon as possible after the information or concern emerges to ensure that the SaPH and in some cases the Police are able to respond within the school day.

The DSL will oversee the completion of a Request for Service Form. This will ideally be immediately following identification of concerns and at the latest within 24 hours to support informed decision making.

If the child is already 'open' to CSC an initial contact will be made with the Social Worker or if unavailable the 'Duty' team member and if necessary, the CSC Team Manager.

In all cases, records of discussions with the SaPH and other professionals will be recorded in the child's file, alongside decision making.



Children's Emergency Duty Team – out of hours concerns

The principal responsibility of the CEDT is to respond to out-of-hours contacts about child/ren where intervention from ERYC is required to safeguard a vulnerable child/ren and where it would not be safe, appropriate, or lawful to delay that intervention to the next working day.

If a child or children are deemed to have or be at risk of significant harm and it is outside office hours, Bay Learning Academy will contact CEDT to discuss their concerns.

On contacting CEDT, Bay Learning Academy are aware that the call will be taken by a Lifeline operator and not a social worker. Lifeline will then pass the information to an on-call CEDT social worker.

Bay Learning Academy will ensure they are available and contactable to receive a call back from the CEDT social worker who may need to gather further information or confirm the outcome of the contact.

All the above will be fully recorded on the child's file and information shared on an 'as required' basis.

Bay Learning Academy will follow up a contact with CEDT by submitting a Request for Service as soon as possible / the next working day.

TAF / TAS, Case Conferences, Core Group, & Strategy Meetings

Bay Learning Academy recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the local ERSCP multi-agency safeguarding arrangements as identified within Working Together to Safeguard Children, 2023.

The DSL & Headteacher will ensure that the appropriate member(s) of staff attend support and attend all relevant meetings, including Initial & Review Child Protection Case Conferences and subsequent Core Groups and that written reports are prepared for each Case Conference.

Concerns shared by Children

Bay Learning Academy recognises that a child-centred approach is vital for safeguarding, emphasising listening to children and young people to protect them from abuse, exploitation, and neglect. We aim to build resilience and ensure children know they can seek help, access support, and that their concerns will be taken seriously.

All staff understand the challenges children face in sharing concerns and how to respond appropriately. They will also work to build trusted relationships that facilitate communication.

Staff will stay vigilant, speak to the DSL if concerns arise, and recognise risks both inside and outside the home, including online.

Children will be informed about opportunities to seek advice and support through the curriculum, including Relationship, Sex, and Health Education.

Children and young people are made aware that Bay Learning Academy's approach to any incident of child-on-child abuse (including sexual violence and sexual harassment) is confidential, and they understand that their concerns will be treated seriously. Bay Learning Academy's reporting mechanism is promoted via our handbook and induction and the guidance from Part Five of KCSiE 2025 is followed.



Confidentiality

It is recognised that all matters relating to child protection are highly confidential and the DSL / DDSL will share that information on a 'need to know, what and when basis.' In line with this, records will be stored securely with restricted access to only relevant staff. Add the arrangements for protecting sensitive / confidential information when using electronic recording platforms e.g., restricted access to categories etc.

Staff are made aware that these concerns or other matters relating to pupils should never be discussed elsewhere, inside or outside Bay Learning Academy, unless in confidential meetings organised for that purpose. This includes the passing of written information or verbal discussion in any media, including Social Networking sites.

Information Sharing

DfE guidance '*Information sharing advice for safeguarding practitioners*' updated May 2024 - [Information sharing guidance](#) - outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes. It also includes the "Seven Golden Rules for Sharing Information," which provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm. It is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

Bay Learning Academy has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure compliance with all matters relating to confidentiality and information sharing requirements.

Record keeping and Transferring / Retaining Records

The DSL is responsible for maintaining records and for deciding at what point these records should be shared with, or transferred to, other agencies or schools, in consultation with the Headteacher or appropriate Senior Manager.

Child protection records will be kept confidential and stored securely, will be kept for individual children, and will be maintained on Compass MIS.

The information in these files may be shared with other agencies as appropriate and in some cases used as evidence by other agencies in line with current information sharing guidance and GDPR (2018).

Factual, verified information is recorded as such and a distinction clearly documented when judgement and opinion is included. Information 'reported' by outside individuals is indicated as such.

The DSL will decide what information needs to be shared within Bay Learning Academy with whom and when on a case-by-case basis. Confidentiality is essential, but staff working with children can only provide effective support and monitor concerns if they are made aware that there are concerns or at least that individual children are being monitored.

Child Protection records are reviewed on a minimum of each term to check whether any action, advice or updating is needed.



Where Bay Learning Academy receives child protection files from another setting, the DSL will ensure key staff, with oversight for SEND, will be made aware of relevant information as required.

Reasonable Force

Bay Learning Academy would consider use of Reasonable Force set out in KCSiE, 2025 (Para. 163-165) and also current statutory guidance DfE (2013) 'Use of reasonable force in schools' - [Reasonable Force 2013](#) and any changes planned to this from September 2025 in DfE (2025) 'Use of reasonable force and other restrictive interventions in schools. Guidance for schools in England' - [Reasonable Force 2025](#) as absolutely reserved whereby it is deemed that serious injury to another person could occur.

If required, a Safety Plan for individual pupils will be put in place and agreed with parents. Restorative methods will be considered after each such incident and the pupil/student views on the incident sought. Support will be offered to staff involved and incidents will be reviewed by senior staff not involved directly and any aspect that could be improved or avoided in future will inform the planning process.

Safer Recruitment and Staff Vetting

Bay Learning Academy complies fully with Statutory Guidance KCSiE 2025, Part Three and the ERYC Safer Recruitment supporting guidance.

This covers the recruitment process and includes adverts, application form, shortlisting and related reference seeking and standardised online checks on candidate at the shortlisted stage, employment history, selection and pre-appointment vetting checks relevant to the role and recording information. Bay Learning Academy ensures that DBS checks on all staff, Directors and volunteers who are engaged in Regulated Activity are carried out as outlined and required in KCSiE 2025. This includes a check with the children's Barred List and would alert Bay Learning Academy to any Secretary of State section 128 Direction. All other required pre-employment vetting as outlined in KCSiE 2025 will be completed.

Allegations against staff, including supply teachers, volunteers and contractors and Whistleblowing

Concerns that meet the 'Harm Threshold.'

KCSiE 2025, Part Four, outlines the 'Harm Threshold' and supporting procedures that school will follow. Staff are aware that an allegation may be made in respect of behaviour that meets the 'Harm Threshold'. This covers staff behaviour that may have harmed a child, involve a crime, is inappropriate behaviour towards a child either in their professional or private life or behaviour in their private life or the community not involving a child, but that may suggest that they could present a risk to children.

All staff have access to:

- KCSiE 2025 – Part Four: Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors.
- Staff Code of Conduct 2025-2026
- Whistleblowing Guidance 2025-2026



- Contact details for LADO

All staff are made aware of their responsibilities and procedures to follow. However, it must be appreciated that in the case of a whistleblowing situation, an investigation process may reveal the source of the information and a statement by the referrer might be required.

All staff are made aware that if they receive an allegation of inappropriate or abusive behaviour about a colleague, or feel required to make such an allegation, they should pass the information, without delay, to the Headteacher.

If the allegation concerns the Headteacher, the referrer should contact the CoG, a senior member of staff or the LADO immediately (in the event of concerns/allegations about the Headteacher, where the Headteacher is also the sole proprietor of an independent school, this should be reported directly to the LADO).

It is unacceptable for any member of staff not to refer such concerns.

The Headteacher will, on the same day, contact the LADO and follow the statutory guidance KCSIE 2025, Part Four.

Following information sharing and a referral to the LADO, discussion will determine if the allegation / potential concern meets the Harm Threshold. Those involved will agree further action to be taken in respect of the child and staff member.

All involved will attempt to ensure that any allegation is dealt with fairly, quickly, proportionately and consistently, in a way that provides effective protection for the child and at the same time supports the person who is subject to the allegation.

If the member of staff feels that the actions taken are inappropriate, ineffective or that the situation of concern is continuing and they feel the situation is urgent, they should raise concerns and press for reconsideration or discussion.

Low-level Concerns

Bay Learning Academy adopts a proactive approach to low-level concerns, to foster a safer environment for children, uphold professional boundaries for staff, and ultimately reduce the risk of harm. Low-level concerns refers to worries or doubts about the behaviour of a member of staff (or other adult on the premises) that while not meeting the 'harm threshold' for LADO involvement and investigation, are nevertheless inconsistent with Bay Learning Academy's code of conduct and expectations.

Low-level Concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, from vetting checks or from staff self-reporting. Low-level Concerns can encompass a broad range of behaviours', including those that are:

- Inadvertent or thoughtless: Actions that might be misinterpreted or appear compromising, even if unintentional.
- Contextually inappropriate: Behaviour that might be acceptable in some situations but is not in a school environment.
- Indicative of potential risk: Behaviour that, even if seemingly minor, could be a precursor to abuse.

KCSiE, Part Four, provides examples of behaviour that would constitute a Low-level Concern, including but not limited to:



- Being overly friendly with children or having favourites.
- Taking photographs of children on a mobile phone against school policy.
- Engaging with a child one-on-one in a secluded area or behind a closed door.
- Using inappropriate language towards pupils, even if not explicitly sexualized.
- Humiliating children.

Staff are aware that it is crucial that all Low-level Concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Addressing low-level concerns is crucial for several reasons:

- Minimizing the risk of abuse: Early identification of concerning behaviour can prevent it from escalating into more serious incidents or even abuse.
- Promoting a culture of safety: Consistently responding to concerns, no matter how small, sends a clear message that child safety is paramount and inappropriate behaviour will not be tolerated.
- Protecting adults: A transparent system for reporting and addressing concerns can also protect staff from false allegations or misunderstandings.
- Identifying training needs: Low-level concerns can highlight areas where staff may need further training or improved induction.
- Reporting and responding to low-level concerns

Bay Learning Academy has a clear policy and procedures for reporting and responding to low-level concerns. This incorporates information for staff on reporting and Bay Learning Academy approach to recording, reviewing and responding.

The Headteacher will take the lead on investigating any reported Low-level Concerns and will oversee the other aspects of Bay Learning Academy procedure for managing Low-level Concerns. Concerns in relation to the Headteacher are directed to the Directors. Low-level Concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.

Safeguarding Culture and Whistleblowing

Whistleblowing plays a crucial role in safeguarding children within school settings. It provides a mechanism for staff members to raise concerns about potential wrongdoing, malpractice, or risks that could impact a child's safety and well-being.

At Bay Learning Academy we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns that they have

Bay Learning Academy Whistleblowing Policy is available to all staff which outlines the approach to supporting any need for Whistleblowing and related expectations located on staff SharePoint. This Policy is an indispensable part of our overall safeguarding strategy. It empowers staff to prioritise the safety and well-being of children by providing a secure and effective means to report concerns and ensure appropriate action is taken

Some examples where Whistleblowing may apply:



- pupil's or staff member's health and safety are being put in danger
- failure to comply with a legal obligation or statutory requirement
- attempts to cover up the above, or any other wrongdoing that is in the public/school interest

Staff are aware of the need to report concerns promptly and that concerns will be taken seriously and investigated, and confidentiality respected as far as possible.

Concerns should be reported to the Headteacher/other member of staff on the SLT, and if concerns are about the Headteacher, report to the Directors.

The NSPCC whistleblowing advice line is available here for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 from 8am to 8pm, Monday to Friday or via email help@nspcc.org.uk

Complaints

At Bay Learning Academy we are committed to open and honest, transparent communication with all members of our school community. We attempt to resolve any concerns as soon as possible and through informal discussion and agreement. In the event of this not being possible, Bay Learning Academy Complaints Policy is available and documents the graduated process to dealing with formal complaints made to Bay Learning Academy and avenues for escalation of complaints if not resolved. The SLT will take all concerns seriously and respond in line with the appropriate process and encourage concerns to be reported directly to school.

Bay Learning Academy Complaint Policy can be found <https://baylearning.academy/our-policies/>

Use of Premises by Other Organisation

Bay Learning Academy does not lease to other organisations.

Site Security and The Terrorism (Protection of Premises) Act 2025 (Martyn's Law)

The following procedures are in place:

- There is a specific H&S policy in place.
- Daily visual site inspections are carried out before school.
- Termly H&S inspections are carried out.
- Annual Directors H&S and environmental audits & inspections are carried out.

All staff are aware of their responsibilities for procedures for reporting Health & Safety concerns and there is a clear system for staff and pupils to report and log Health & Safety concerns.

The DSL will be made aware immediately of any issues that could result in a safeguarding matter for children and young people following the daily visual site inspections and will remedy as soon as possible.

Fire practices are held regularly at varying times of the day and week and any deficiencies corrected.

School is aware of the requirements of The Terrorism (Protection of Premises) Act 2025, also known as Martyn's Law. Communication systems are in place and understood by all staff and volunteers to ensure appropriate and safe responses in the event of critical incidents.

This includes:

- the need to evacuate in the event of a bomb scare or fire.



or

- the need to initiate a complete or partial 'lock down.'

As part of the UK Counter Terrorism Strategy (CONTEST), public places are asked to consider the risk of a terrorist attack and what preparations could be made to mitigate that risk.

Working with relevant colleagues the DSL will assess site security and ensure there are emergency and simple response plans in line with the DfE (2024) non-statutory guidance *Protective security and preparedness for education settings* - [Protective security and preparedness for education settings](#)

It is recognised that Incidents in schools are rare, but we will have in place simple procedures to ensure site security awareness and preparedness (lockdown, invacuation, evacuation and bomb threat procedures). The aim is to deter terrorists and other security threats and help keep pupils, staff and visitors safe in the event of an incident.

Schools is aware of Martyn's Law Factsheet – [Martyns Law Factsheet](#)

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into School/College.

Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

Bay Learning Academy will not accept the behaviour of any individual (parent or other) that threatens security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the site.

Volunteers

All volunteers will receive an induction prior to any activity on site which will include information covering expectations in relation to, for example, safeguarding, conduct and Health and Safety.

Contractors, Visitors, Supply and Agency Staff and ITT Trainees

Bay Learning Academy will ensure that any of the above when working on site will be subject to the appropriate level of DBS check and have the related level supervision, as set out in KCSiE 2025 (Part Three: iii).

Any of the above engaging in Regulated Activity will be subject to an Enhanced DBS check (including children's Barred List information). This will be obtained, either directly by Bay Learning Academy as required, or will be confirmed as such through checks and written assurance from the supplier organisation (which will also confirm that appropriate safeguarding, safer recruitment and DBS / vetting procedures are in place).

If not engaged in regulated activity Bay Learning Academy will ensure that appropriate supervision is in place and consider whether a DBS check is required, in line with the nature of the activity and any contact with children.

Visitors to Bay Learning Academy, including contractors and volunteers, are asked to sign in and are given an identity badge to confirm that they have permission to be on site. The identity of contractors will be checked upon arrival.



The Single Central Record is maintained to ensure that all appropriate staff, volunteers, Directors, agency and contracted staff in Regulated Activity are entered on it.

Offsite Provision and Educational / Residential Visits

When pupils attend off-site activities and provision including day, residential, work-related learning placements and other alternative provision we will ensure that we obtain the written assurances covering safeguarding requirements. The DSL will discuss any arrangements and concerns (on an individual or collective level) with the Educational Visits Coordinator(s) and visit leaders at the visit planning stage. Bay Learning Academy will follow the appropriate ERYC (or equivalent) planning and risk assessment procedures for all educational visits and activities.

Artificial intelligence (AI)

It is recognised that generative AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Any misuse of AI to access harmful content, bully pupils or behave inappropriately in terms of school behaviour expectations will be considered as a safeguarding concern and alongside other school policies such as Behaviour Policy, Mobile Phone Policy and Online Safety & Harms Policy.

Safety is our main priority when deciding whether to use generative AI. Any use of generative AI by staff and pupils will be carefully considered and assessed, evaluating the benefits and risks of use. The use of AI will be in line with the appropriate DfE guidance and policy for AI including

DfE (2025) 'Generative artificial intelligence (AI) in education' - [Generative AI in education](#)

DfE (2025) 'Using AI in education settings: support materials' - [AI education support materials](#)

DfE (2025) Using 'AI in education: support for school and college leaders' - [AI support for leaders](#)



Appendix 1 - Definitions and Acronyms

AP	Alternative Provision
CAS	Child Assessment Service
CCE	Child Criminal Exploitation
CEDT	Children's Emergency Duty Team
Child	Any pupil under the age of 18 is legally a child
Child Protection	Refers to the multi-agency arrangements to identify and protect children who are, or may be, at risk of Significant Harm
CLA	Child Looked After
CSC	Children's Social Care
CSE	Child Sexual Exploitation
DBS	Disclosure & Barring Service
DDSL	Deputy DSL
DfE	Department for Education
DSG	Designated Safeguarding Governor
DSL	Designated Safeguarding Lead
EHCP	Education, Health and Care Plan
EHPH	Early Help and Partnership Hub
ERSCP	East Riding Safeguarding Children Partnership
EWO/S	Education Welfare Officer/Service
FH	Family Help (Previously Early Help)
GDPR	General Data Protection Regulation
KCSiE 2025	Keeping Children Safe in Education 2025
LADO	Local Authority Designated Officer
MAC	Making a Change Team
NEST	Neglect and Environmental Screening tool
PLAC	Previously Looked After Children
Pupils 18 or over	If there is a concern about the welfare of a pupil aged 18+ DSLs are advised to seek advice in the same way as for children
RIT	Risk Indicator Tool
RSE	Relationship and Sex Education (Primary)
RSHE	Relationship, Sex and Health Education (Secondary)

Bay Learning Academy CIC

Thornton Village Hall, 47 Walker Street, Hull HU3 2HD

Registered UK Learning Provider

UKPRN 10090784



Safeguarding	Refers to the protection, safety, and promotion of the welfare of all pupils including when in offsite provision or activities and using IT. This includes the building of resilience and awareness of risk through the formal and informal curriculum.
SaPH	Safeguarding and Partnership Hub
Sexual Harassment	Sexual comments, sexual "jokes" or taunting, physical behaviour, online sexual harassment, consensual and non-consensual sharing of nudes and semi-nude's images and videos, sharing of unwanted explicit content, up-skirting, sexualised online bullying, unwanted sexual comments, and messages (including on social media), sexual exploitation (coercion and threats)
Sexual Violence	Rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent
SiET	Safeguarding in Education Team
SLT	Senior Leadership Team
SVSH	Sexual Violence and Sexual Harassment between children in schools and colleges
TAF	Team Around the Family
TAS	Team Around the School
VCET	Vulnerable Children Education Team



Appendix 2 - Related Legislation and Guidance

This policy is implemented in accordance with our compliance with DfE statutory guidance KCSiE 2025, which requires that individual schools and colleges have an effective Child Protection Policy. The principles established in the Children Acts 1989 and 2004 and related guidance, underpin the development of this Policy. This includes but is not limited to:

- Keeping Children Safe in Education (DfE, 2025) -
- Working Together to Safeguard Children (December 2023) HM Government
- ERSCP - Effective support for children, young people, and families in the East Riding of Yorkshire (August 2020)
- Guidance for safer worker practice for those working with children and young people in education setting (February 2022) – Safer Recruitment Consortium
- Use of reasonable force in schools (DfE, February 2025)
- Searching, screening & confiscation (DfE, July 2022)
- School Staff & Volunteer Code of Conduct (ERSCP, September 2025)
- Information sharing Advice for practitioners providing safeguarding services to children, young people, parents, and carers (DfE, May 2024)
- Guide to General Data Protection Regulation (ICO 2018)
- Data Protection in Schools (DfE, June 2025)
- School Whistle Blowing (Child Protection / Safeguarding) Guidance (ERSCP Sept 2025).
- Statutory guidance, Prevent duty guidance: for England and Wales (March 2024) GOV. UK
- Prevent statutory duty (May 2021) - GOV.UK
- Multi-agency statutory guidance on female genital mutilation (2020) HM Government
- What to do if you are worried a child is being abused (2015) HM Government
- Working Together to Improve School Attendance (DfE, Aug. 2024)
- Support for pupils where a mental health issue is affecting attendance Effective practice example (DfE, Feb. 2023)
- Summary table of responsibilities for school attendance Guidance for maintained schools, academies, independent schools, and local authorities (DfE, August 2024)
- Suspension and Permanent Exclusion from maintained schools, academies, and pupil referral units in England, including pupil movement Guidance for maintained schools, academies, and pupil referral units in England (DfE, August 2024)
- Behaviour in Schools: Advice for headteachers and school staff (DfE, Feb. 2024)
- LA Education Visit Guidance and Procedures or equivalent
- The designated teacher for looked-after and previously Looked After Children (DfE, Feb. 2018)
- Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension (DfE, July 2025 / update)



- Disqualification under the Childcare Act 2006 Statutory guidance for Local Authorities, maintained schools, academies, and free schools (DfE, Aug. 2018)
- After-school clubs, community activities, and tuition Safeguarding guidance for providers (DfE, September 2023)
- Meeting digital and technology standards in schools and colleges (DfE, March 2023)
- Guidance for maintained schools and academies in England on provision for transgender pupils (Nov. 2022)
- Gender Questioning Children Non-statutory guidance for schools and colleges in England Draft for consultation (DfE, Dec. 2023)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people Responding to incidents and safeguarding children and young people (UKCIS, March 2024)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (DfSIT, March 2024)
- Teaching online safety in schools (DfE, Jan. 2023)
- Relationships and Sex Education (RSE) and Health (DfE, July 2025)
- ER Use of Unregulated Alternative Provision Guidance August 2025
- Plan technology for your school (DfE, Sept 2024)
- Generative AI: product safety expectations (DfE, Jan. 2025)
- Cyber Security - Meeting digital and technology standards in schools and colleges
- Arranging Alternative Provision - A Guide for Local Authorities and Schools (DfE, Feb, 2025)



Appendix 3 – Categories of Abuse, Neglect and Exploitation

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate.
- Self-harm, self-mutilation or attempts at suicide.
- Alluding to secrets which they cannot reveal.
- Tendency to cling or need constant reassurance.
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby.
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger.
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

Signs that MAY INDICATE Physical Abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso.
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns.



- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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 overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE Emotional Abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted.
- Unwillingness or inability to play.
- Excessive need for approval, attention, and affection

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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE Neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing



- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers Low Self Esteem
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking.
- Running away
- Loss of weight or being constantly underweight
- Low Self Esteem

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

Different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money, or new possessions.
- associate with other children involved in exploitation.
- suffer from changes in emotional well-being.
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (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; and
- 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

[CSE Docs and Link](#)

County lines



County lines is a term used to describe gangs and organised criminal networks

involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes, and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from
- their home
- have been the victim, perpetrator, or alleged perpetrator of serious violence (e.g.
- knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs,
- handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed.
- internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap.
- house or cuckooing’ or hotel room where there is drug activity.
- owe a ‘debt bond’ to their exploiters.
- have their bank accounts used to facilitate drug dealing



APPENDIX 4 – Responding to Concerns – Advice to Staff

- React calmly promise CONFIDENTIALITY not SECRECY
- Be aware of your non-verbal messages
- Keep responses short, simple, slow and gentle
- Do not stop a child or parent who is talking freely about what has happened
- Observe and listen but only ask open ended questions if you need to clarify but this may be better left to the DSL or others

The use of 'TED' questioning may be appropriate

- Tell me what happened
- Explain what you mean
- Describe how it made you feel

Or other open-ended type questions e.g.

- What happened?
- Where were you?
- When did this happen?
- Who was there?
- How did it make you feel?

If you have difficulty in understanding the child or parent's communication method, reassure them that you will find someone who can help.

- Tell the child or parent they have done the right thing by telling you.
- Avoid making comments or judgements about what is shared.
- Tell the child or parent what will happen next and be honest.

Make a written note on a 'Record of Concern sheet': or equivalent – insert details

- What is said and Who is present
- What, if any, questions you asked and the responses
- Anything else that happens after the child discloses
- Ensure legibility, full dates & clear signature
- Maintain strict confidentiality

If you see or are shown marks or injuries pass the information to the DSL immediately



Appendix 5 – Example of Advice for Children

If someone is hurting or upsetting you or making you feel scared you, it is not your fault.

You are not alone, there are people who can help you and stop people from making you feel scared or hurt.

You may be frightened of the person hurting you or your friends, but there are things you can do to get help and make it better.

This includes someone who may be frightening you on the internet or on your mobile

You should:

- Tell someone you trust, such as your friends, teachers, parents, grandparents. Other people at school may be able to help.
- Let people help to make things better by stopping the person from hurting you or your friends.

You shouldn't:

- Feel embarrassed or alone.
- Feel that it is your fault or that you are to blame for someone hurting, frightening or touching you. Anyone who tells you that, is a liar.
- Keep it a secret.
- Feel you have no one to turn to – people are there to help.

Other help

www.nspcc.org.uk

www.childline.org.uk 0800 1111

www.barnardos.org.uk

www.saferinternet.org.uk

www.thinkuknow.co.uk

www.childline.org.uk



Appendix 6 - Example - Safeguarding Children; Information for Visitors, Supply Staff and Volunteers

Bay Learning Academy is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. This means that we have a Safeguarding and Child Protection Policy and procedures in place.

All people in Bay Learning Academy community have a responsibility to act on any concerns that they have about a child's wellbeing.

If you are concerned about a child's welfare, please record your concerns, and any observations or conversation heard, and report this as soon as possible the same day. Ask to speak to Bay Learning Academy DSL or any member of the Senior Leadership Team

Please ensure that you share the full details and that these are recorded including date, time, child's name, your name and a factual account of what was said or observed.

Do NOT conduct your own investigation. Keep all concerns or information confidential.

You might be concerned if:

- You see an injury.
- Another person may express concerns.
- Something else raises concerns or worries.
- A pupil tells you something.

If a pupil tells you something that needs to be passed on:

- Promise confidentiality not secrecy.
- Reassure the child that they have done the right thing.
- Listen but do not ask leading questions.
- Record and pass on your concerns.

Your help in supporting our safeguarding work is appreciated by Bay Learning Academy and most importantly by the children and young people.

- Designated Safeguarding Lead is
- Deputy Designated Safeguarding Lead is
- Designated Safeguarding Governor is



Appendix 7 - Information for Parents

At Bay Learning Academy, we recognise that your child is our responsibility and concern. We want to work in partnership with you, and discuss with you, any concerns we may have or that you may have.

It is a priority to inform and involve you at every stage in your child's time at Bay Learning Academy.

Since the first priority is your child's welfare, there may be rare occasions when our concern about your child means that we have to consult other agencies even before we contact you.



Appendix 8 - Support Organisations

NSPCC 'Report Abuse in Education' Helpline

0800 136 663 or help@nspcc.org.uk

National Organisations

NSPCC: www.nspcc.org.uk

Barnardo's: www.barnardos.org.uk

Action for Children: www.actionforchildren.org.uk

Children's Society: www.childrenssociety.org.uk

Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

Education Support Partnership: www.educationsupportpartnership.org.uk

Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for pupils/students

ChildLine: www.childline.org.uk

Papyrus: www.papyrus-uk.org

The Mix: www.themix.org.uk

Shout: www.giveusashout.org

Fearless: www.fearless.org

Victim Support: www.victimsupport.org.uk

Support for Adults

Family Lives: www.familylives.org.uk

Crime Stoppers: www.crimestoppers-uk.org

Victim Support: www.victimsupport.org.uk

The Samaritans: www.samaritans.org

NAPAC (National Association for People Abused in Childhood): www.napac.org.uk

MOSAC: www.mosac.org.uk

Action Fraud: www.actionfraud.police.uk

Shout: www.giveusashout.org

Advice now: www.advicenow.org.uk

Support for Learning Disabilities

Respond: www.respond.org.uk

Mencap: www.mencap.org.uk

Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

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

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Registered company in England and Wales as

Bay Learning Academy CIC

Company Number 14094467 VAT No. 435 8221 00



Substance Misuse

Talk to Frank: www.talktofrank.com

Domestic Abuse

Domestic abuse services: www.domesticabuseservices.org.uk

Refuge: www.refuge.org.uk

Women's Aid: www.womensaid.org.uk

Men's Advice Line: www.mensadvice.org.uk

Mankind: www.mankindcounselling.org.uk

National Domestic Abuse Helpline: www.nationaldahelpline.org.uk

Respect Phoneline: <https://respectphoneline.org.uk>

Criminal and Sexual Exploitation

National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are

It's not okay: www.itsnotokay.co.uk

NWG Network: www.nwgnetwork.org

County Lines Toolkit for Professionals:

www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Honour Based Abuse

Karma Nirvana: <https://karmanirvana.org.uk>

Forced Marriage Unit: www.gov.uk/guidance/forced-marriage

FGM Factsheet:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/5_6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Mandatory reporting of female genital mutilation: procedural information:

www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

The right to choose - government guidance on forced marriage:

www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Child-on-Child abuse, including bullying, sexual violence and harassment

Rape Crisis: <https://rapecrisis.org.uk>

Brook: www.brook.org.uk

Disrespect Nobody: www.disrespectnobody.co.uk

Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights

Lucy Faithfull Foundation: www.lucyfaithfull.org.uk

Stop it Now! www.stopitnow.org.uk

Parents Protect: www.parentsprotect.co.uk

Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk

Diana Award: www.antibullyingpro.com/

Bullying UK: www.bullying.co.uk



Kidscape: www.kidscape.org.uk

Online Safety

NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk

Internet Watch Foundation (IWF): www.iwf.org.uk

Childnet: www.childnet.com

UK Safer Internet Centre: www.saferinternet.org.uk

Report Harmful Content: <https://reportharmfulcontent.com>

Marie Collins Foundation: www.mariecollinsfoundation.org.uk

Internet Matters: www.internetmatters.org

NSPCC: www.nspcc.org.uk/online-safety

Get Safe Online: www.getsafeonline.org

Parents Protect: www.parentsprotect.co.uk

Cyber Choices:

<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

Mind: www.mind.org.uk

Moodspark: <https://moodspark.org.uk>

Young Minds: www.youngminds.org.uk

We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/

Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and Hate Crime

Educate against Hate: www.educateagainsthate.com

Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism

True Vision: www.report-it.org.uk

Children with Family Members in Prison

National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>



Appendix 9 - Contacts List – Correct as of September 2025

Role / Agency	Name and Role	Contact Details
Safeguarding and Partnership Hub	Child Protection Request for Service (RFS) Immediate Concerns Line T/c Contact with ASW	Mon – Thurs 8.30am – 5.30pm Friday – 8.30a, - 4.30pm 01482 395500 RFS should be sent to safeguardingchildrenshub@eastriding.gov.uk
Children's Emergency Duty Team	Urgent CP concerns outside of office hours when a child is at risk of or suffering significant harm	01482 393939
Early Help Hub	Early Help RFS	01482 391700 All RFS to be sent to ehphub@eastriding.gov.uk
Family Help School and Community Team Managers	North East West West	Debbie Sturdy – deborah.sturdy@eastriding.gov.uk Carol Vine – carol.vine@eastriding.gov.uk Poppy Dean – poppy.dean@eastriding.gov.uk Emma Stow – emma.stow@eastriding.gov.uk
Safeguarding in Education Team Manager	Chris Hamling General strategic and operational safeguarding advice	chris.hamling@eastriding.gov.uk Please always use the SiET Inbox to initiate contact SiET safeguardingineducation@eastriding.gov.uk
ERYC LADO	Jayne Hammill Lisa Breene Referral of allegations against staff and volunteers	Please always use the LADO email to initiate contact with LADO LADO@eastriding.gov.uk
NSPCC Whistleblowing	NSPCC advice line is available here for staff who do not feel able to raise concerns regarding child protection failures internally	0800 028 0285 from 8am to 8pm, Monday to Friday or via email help@nspcc.org.uk
School critical incident, bomb threats etc & Educational Visit	24 hour guidance and support	01482 392999

Bay Learning Academy CIC

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Emergencies (not Child Protection)		
Humberside Police	Protecting Vulnerable People Unit	01482 220809
Humberside Police	Non-Emergency / Hate Crime Incident Reporting / Information Sharing	Telephone – 101 https://www.humberside.police.uk/ro/report/hate-crime/triage/v1/report-hate-crime/ https://www.humberside.police.uk/ro/report/ocr/af/how-to-report-a-crime/ https://www.humberside.police.uk/partners/partner-services/community-partner-intelligence/v2/share-community-partnership-intelligence/share-community-partnership-intelligence/
ERSCP	General strategic and operational Safeguarding and CP advice and multi-agency training	https://www.erscp.co.uk/ ERSCP.enquiries@eastriding.gov.uk ERSCP.training@eastriding.gov.uk
Hull N Yorks N Lincs NE Lincs	Out of County - Children's Social Care	01482 448879 EDT 01482 300304 0300 131 2 131 EDT 01609 780780 01724 296500 EDT 01724 296555 01472 326292 EDT 01472 326292
ERYC Child Exploitation	Making a Change Team	makingachangeteam@eastriding.gov.uk
Prevent	Humberside Police	101 / 0800 011 3764 (National Police Prevent Advice) https://www.humberside.police.uk/advice/advice-and-information/t/prevent/prevent/beta/prevent-team-referral/ prevent@eastriding.gov.uk

Kingston upon Hull Children's Social Care (LA)

- Early Help and Safeguarding Hub (01482) 448879
- Emergency Duty Team (01482) 300304
- Hull Safeguarding Children's Partnership (01482) 846082
- Local Authority Designated Officer (01482) 790933
- Police Public Protection Unit via non-emergency 101

Hull Safeguarding Children's Partnership - HSCP - <https://hullscp.trixononline.co.uk>

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