



SAFEGUARDING AND CHILD PROTECTION **POLICY**

Approved by: Dan Clark, Vikki Hearst

Last Review: August 2026

Next Review Date: August 2027

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

Head of Safeguarding: Vikki Hearst

Deputy Designated Safeguarding Lead/s: Sam Hollandt, Leo Worsdale

The Head of Safeguarding (HoS) and Deputy Designated Safeguarding Leads (Deputy DSL) have responsibility for ensuring that the safeguarding of children is central to the ethos of our organisation. They are suitably trained and experienced and carry out the duties of the HoS role summarised in this policy.

This policy is reviewed annually or following national or local safeguarding changes to policy and procedure as and when they occur.

Safeguarding Contacts

For immediate harm / danger you must call the police on 101 or 999, or the Out of Hours Emergency Duty team for your Local Children's Services. You can ask for advice on how to do this by contacting the Head of Safeguarding out of hours.

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY!

If you have a concern about a Mentee/Young Person or Mentor and need advice or support, please immediately inform our MindJam Safeguarding Team (details below). The Safeguarding Team will review your concern and inform, where appropriate, the relevant Local Authority contact and/or the parents of the individual the concern is about.

If you need advice regarding a potential safeguarding concern, and for all other safeguarding queries, please email safeguarding@mindjam.org.uk.

If you need to report a safeguarding concern, please complete the Safeguarding Webform which can be found under 'Safeguarding' on the MindJam website mindjam.org.uk.

Head of Safeguarding:

Vikki Hearst: vikkihearst@mindjam.org.uk

All Safeguarding queries and concerns: safeguarding@mindjam.org.uk

Deputy DSLs:

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Purpose

The purpose of this policy is to ensure that MindJam takes action in a timely way to safeguard and promote children's welfare. That all staff are aware of their safeguarding responsibilities and that MindJam adopts KCSIE and local procedures as benchmark guidance, also that staff are properly trained in recognising and reporting safeguarding issues.

This policy will also

- clarify the roles and responsibilities of everyone at MindJam in relation to child protection and safeguarding
- provide information on the range of safeguarding concerns

*Please note: All references to or mentions of Legislation/standards are for the most current version. Versions are detailed in **Policy Context**.

Scope

This policy applies to all individuals working with MindJam. Any mentor employed by MindJam who comes into contact with children must abide by this policy. **Everyone working for MindJam has a duty to safeguard and protect the young people we work with.** They must read this policy and sign to say they agree to work to it.

In this policy, the term 'child' or 'children' refers to anyone under the age of 18 years. The term 'parent' refers to both parents and carers.

Safeguarding Commitment

As an organisation that prioritises the safeguarding of children and all vulnerable people, MindJam is committed to providing a safe environment across all we do by actively adopting strategies that embed a culture of zero tolerance for abuse of any kind.

Responsibilities

Safeguarding and child protection is everyone's responsibility.

This policy applies to all staff, mentors and those in leadership in the provision and is consistent with the procedures of the 3 safeguarding partners (Local Authorities, Chief Officers of Police and Clinical Commissioning Groups). MindJam shares significant

safeguarding information with parents/carers and the commissioning school/LA the same day, and follows local missing/absent and Children Missing Education (CME) procedures alongside commissioners.

MindJam maintains a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

All staff/mentors:

All staff and mentors will:

- Read and understand KCSIE Part 1 in full, and the 'further information' annex (Annex A of KCSIE 2026) where directed. In line with KCSIE 2026, which has withdrawn the previous condensed annex, all staff — including those who do not work directly with children — read Part 1 in full; all receive role-relevant induction.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what platforms/games are accessed during a session.
- Provide a safe space for young people who are LGBTQ+ to speak out and share their concerns. Staff must not promise confidentiality; they explain next steps and support, and record concerns via the safeguarding web form the same day.

All staff and mentors will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, MindJam's code of conduct, the role and identity of the Head of Safeguarding (HoS) and deputy, the behaviour policy and the online safety policy
- The early help assessment process within their mentees local area and their role in it, including identifying emerging problems, liaising with the HoS, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child

sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

The Head of Safeguarding (HoS)

The HoS is a member of MindJam's Senior Leadership Team. The HoS takes lead responsibility for child protection and wider safeguarding within MindJam. This includes online safety.

The HoS will be available during normal working hours for staff or mentors to discuss any safeguarding concerns. The HoS ensures same-day liaison with the commissioner for significant incidents/risks.

When the HoS is absent, the deputy will act as cover.

In extreme circumstances, if the HoS and deputy are not available, members of the Senior Leadership Team will act as cover.

The HoS will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff and mentors on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff and mentors to do so
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff/mentors who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Make sure that staff/mentors have appropriate Prevent training
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

The Senior Leadership Team

The Senior Leadership Team will:

- Facilitate a whole-provision approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and within each local multi-agency safeguarding arrangements
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is updated annually
- Ensure that MindJam is aware of appropriate filtering and monitoring systems and the limitations of these systems in mentee's homes. This includes:
 - Making sure that the leadership team, staff/mentors and parents understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the DfE's filtering and monitoring standards, and discussing with staff/mentors and parents what needs to be done to support MindJam in meeting these standards (e.g., monitoring to be carried out by parent/responsible adult at home or school during sessions who is physically present with the mentee. Monitoring also to be carried out by staff/mentor in a virtual capacity during online sessions).

Make sure:

- The HoS has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-provision approach to safeguarding and related policies
- The HoS has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place, including the limitations specific to MindJam's way of working
- MindJam has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members or mentors. Low-level concerns and allegations interface with Managing Allegations policy; commissioners are informed where relevant to their duties.
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

All members of the Senior Leadership Team will read Keeping Children Safe in Education in its entirety.

The Head of Safeguarding will ensure that staff and mentors

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

In addition to

- Sign-posting this policy to parents/carers when their child joins MindJam
- Ensuring that there is always adequate cover if the HoS is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns

Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Policy

Aims

MindJam aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or repeat occasions

Confidentiality

Confidentiality and data protection within MindJam is covered in more detail in our data protection policy but is outlined with respect to safeguarding here. These are the principles for sharing information within your school or trust, and with the 3 safeguarding partners and other agencies as required.

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff or mentors need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff and mentors should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The HoS will have to balance the victim's wishes against their duty to protect the victim and other children
 - The HoS should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff and mentors will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff (or mentors if applicable) should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and is available to support staff and mentors who have to make decisions about sharing information
- If staff/mentors are in any doubt about sharing information, they should speak to the HoS (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff or mentors

One-to-one sessions

MindJam is an online only provision and therefore our mentors work with children (mentees) on a one-to-one basis. To safeguard both children and mentors, the following procedures will be followed:

- Session times and dates will be recorded on the mentor's calendar for SLT oversight
- Parents/Carers will be informed when sessions are taking place (including any rearranged or rescheduled sessions) and on what platform the session will be taking place (Google Meets is preferred)
- Staff/mentors will never arrange to meet a child alone in person or outside of arranged session times (in person or online)
- Staff/mentors will report to the HoS any situation where they feel the child's behaviour, or the circumstances of a one-to-one meeting/session, has caused concern
- Mentors will
 - have blurred backgrounds (where possible) when on video calls
 - have a suitable and confidential space to work from (no public internet spaces)

- check there is a responsible adult with the child and check in with them during the session, preferably at the beginning of the session
- have camera on where applicable for safeguarding checks and observations. Mentee may turn camera on at the beginning of the session and then turn it off after check has been completed by the mentor

These measures are designed to reduce the risks associated with unsupervised contact and to protect both pupils and staff. More information can be found in MindJam's Code of Conduct.

Recognising abuse and taking action

All staff and mentors are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending

Staff, mentors and SLT members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the HoS to mean “the HoS (or deputy DSL)”.

If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the HoS as soon as possible if you make a referral directly.

If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Complete the **MindJam Safeguarding reporting web form** which will be sent to the HoS. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly, and tell the HoS as soon as possible that you have done so. Aside from these people, **do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process**

Bear in mind that some children may:

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

None of this should stop you from having a 'professional curiosity' and speaking to the HoS if you have concerns about a child.

Historic Allegations

If an adult wishes to raise an allegation to MindJam that they were abused as a child, the adult will be strongly advised to contact the police. Any non-recent allegation made by a child must be

reported to local authority children's social care and/or the police or LADO who will follow the local authority procedures for dealing with historic reporting of incidents.

FGM

If you discover that FGM has taken place or a mentee is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a mentee has already been subjected to FGM, and factors that suggest a mentee may be at risk, are set out in appendix 2 of this policy.

Any member of staff or mentor who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, **personally**. This is a mandatory statutory duty.

Unless they have been specifically told not to disclose, they should also discuss the case with the HoS and involve local authority children’s social care as appropriate.

Any member of staff or mentor who suspects a mentee is *at risk* of FGM or suspects that FGM has been carried out should speak to the HoS and follow local safeguarding procedures.

Mental Health

All staff/mentors should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Mentors, however, are well placed to observe children day-to-day (during sessions) and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which staff/mentors are well placed to recognise.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff/mentors can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

If staff/mentors have a concern about a child's mental health that is also a safeguarding concern, they should follow this policy and speak to the HoS. If staff/mentors feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Staff can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies.

If you have concerns about a child

(as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the HoS first to agree a course of action.

If in exceptional circumstances the HoS is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the HoS as soon as practically possible by completing the MindJam Safeguarding Reporting Form.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the HoS as soon as possible.

Early Help Assessment

If an early help assessment is appropriate, the HoS will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff/mentors may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

In line with KCSIE 2026 and wider reforms to children's social care, we distinguish between universal services and community-based early help, and the targeted early help level of 'Family Help' — a local-authority-coordinated, consent-based offer of support. Where a child would benefit from targeted support, the DSL will liaise with local partners about a referral to Family Help in accordance with local arrangements.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The HoS will keep the case under constant review and MindJam will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the HoS will make the referral or support you to do so.

If you make a referral directly, you must tell the HoS as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The HoS or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the HoS or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Extremism/Prevent

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the HoS first to agree on a course of action.

If in exceptional circumstances the HoS is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the HoS or deputy as soon as practically possible after the referral.

Where there is a concern, the HoS will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of 'becoming involved with or supporting terrorism', or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which MindJam staff and mentors can call to raise concerns about extremism with respect to a mentee. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Prevent Duty:

Information on how to make a referral to Prevent is contained in this link:

[Making a referral to Prevent - GOV.UK](#)

Mental Health

If you have a concern about mental health

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.

Staff/mentors will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. In line with KCSIE 2026, all staff have a role in the early identification of mental ill-health risk, so that concerns are escalated and support is put in place before they develop into safeguarding issues.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps above.

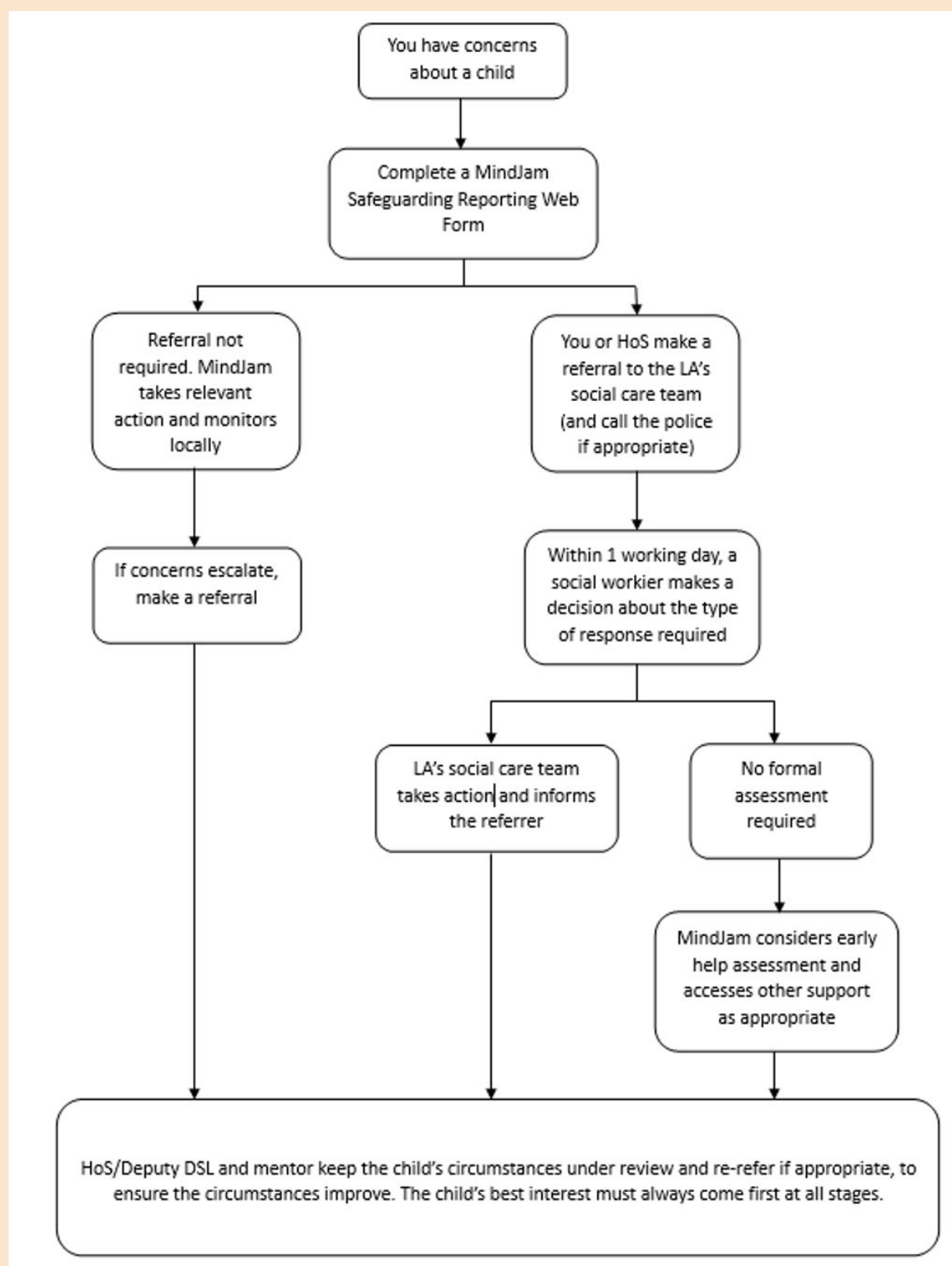
If you have a mental health concern that is **not** also a safeguarding concern, speak to the HoS to agree on a course of action.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

Referral Flowchart

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the HoS is unavailable, this should not delay action. See above for what to do.)



Concerns and Allegations

Concerns about a staff member or mentor

If you have concerns about a member of staff or mentor, or an allegation is made about a member of staff or mentor posing a risk of harm to children, speak to the Head of Safeguarding or CEO, Dan Clark, as soon as possible. If the concerns/allegations are about the Head of Safeguarding or the CEO, speak to a representative of the Senior Leadership Team.

The HoS/CEO/Senior Leadership Team representative will then follow the procedures set out in MindJam's **Managing Allegations Policy**.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff or mentor to the HoS, report it directly to the local authority designated officer (LADO).

Allegations of abuse made against other mentees

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for mentees.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of mentees abusing other mentees will be dealt with under MindJam's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put mentees at risk
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 2 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a mentee makes an allegation of online abuse against another mentee:

- You must record the allegation and tell the HoS, but do not investigate it
- The HoS will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence (radicalisation etc.). Behavioural consequences within MindJam sessions follow the Behaviour Policy
- The HoS will contact the commissioner if applicable

Sharing of Nudes and Semi-Nudes (Sexting)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the HoS immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a mentee to share or download it (if you have already viewed the imagery by accident, you must report this to the HoS)
- Delete the imagery or ask the mentee to delete it
- Ask the mentee(s) who are involved in the incident to disclose information regarding the imagery (this is the HoS's responsibility)
- Share information about the incident with other members of staff/mentors, or the mentee(s) it involves
- Say or do anything to blame or shame any young people involved

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

Head of Safeguarding responsibilities

The HoS will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 2 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)

- What the HoS knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any mentee or other child in the images or videos is under 13
- The HoS has reason to believe a mentee is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

The HoS will also inform the commissioner, if applicable, that a referral has been made. All actions and decisions will be recorded in line with the procedures set out in this policy.

The HoS will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the mentee at risk of harm.

Online Safety

As an online only provider, MindJam recognises the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this

- mentors monitor and supervise the mentee whilst gaming online
- staff/mentors communicate with parents/carers about the mentee's engagement online and how they can monitor the mentee's use of online platforms
- staff/mentors report any incidents or concerns to HoS

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

Support and discuss with mentees about online safety. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- ensure that games accessed during sessions are age appropriate
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff/mentors, as part of their induction, on safe internet use as a mentor and online safeguarding issues during sessions and the expectations, roles and responsibilities around filtering (where applicable) and monitoring. All staff members and mentors will undergo refresher training as required and at least once each academic year
- Inform parents/carers about online safety; supporting with parental controls. We will also share clear procedures with them so they know how to raise concerns about online safety
- Carry out an annual review of our approach to online safety
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety. For full details about MindJam's policies in these areas, please refer to our online safety policy.

Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff/mentors, mentees and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

MindJam recognises that 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 mentees to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

MindJam will treat any use of AI to access harmful content or bully other mentees in line with this policy and our anti-bullying and behaviour policies.

Staff/mentors should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used.

Notifying Parents or Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The HoS will normally do this in the event of a suspicion or disclosure.

MindJam will also notify the **commissioning school/LA** the **same day** for significant incidents/risks, agreeing next steps.

Other staff/mentors will only talk to parents or carers about any such concerns following consultation with the HoS.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

Mentees with a Social Worker

Mentees may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The HoS and all members of staff and mentors will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes.

Looked-after and previously looked-after children

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

- Appropriate staff/mentors have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The HoS has details of children's social workers and relevant virtual school heads

Mentees who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the HoS.

For children questioning their gender, we take a considered and cautious approach, work in partnership with parents/carers (other than in the exceptional circumstances where involving parents would itself raise a safeguarding risk), and address any safeguarding concerns in line with this policy (KCSIE 2026).

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning mentee, we will take a cautious approach as there are still unknowns around the impact of social transition, and a mentee may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the mentee). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where mentees can speak out or share their concerns with their mentor.

Complaints and Concerns about Safeguarding Policies

Complaints against staff or mentors

Complaints against staff or mentors that are likely to require a child protection investigation will be handled in accordance with our Managing Allegations Policy procedures for dealing with allegations of abuse made against staff.

Other complaints

Complaints that do not involve child protection will be handled under MindJam's Complaints Policy.

Whistleblowing

MindJam's whistleblowing policy is available on request.

Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the HoS.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be stored securely on MindJam's Safeguarding drive, kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available to the specific mentor working with that mentee and members of the Senior Leadership Team. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the provision. Significant safeguarding information relevant to the commissioner's duties is shared securely and on the same day where risk dictates.

Guidance And Training

All staff and mentors

All staff members and mentors will undertake safeguarding and child protection training at induction, including online safety, to ensure they understand MindJam's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

MindJam follows the National Online School training pathway and guidance which ensures staff/mentors are in receipt of suitable training to undertake their role. This training is renewed annually.

All staff/mentors will have training on the government's anti-radicalisation strategy, Prevent, to enable them 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, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff/mentor meetings).

The HoS and deputy

The HoS and deputy will undertake DSL specific child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

The Senior Leadership Team

All Senior Leadership Team members 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
- Can be assured that safeguarding policies and procedures are effective and support MindJam to deliver a robust company-wide approach to safeguarding

The CEO may be required to act as the 'case manager' in the event that an allegation of abuse is made against the HoS; they receive training in managing allegations for this purpose.

Recruitment - Interview Panels

All members of the Senior Leadership Team may conduct interviews and will have undertaken safer recruitment training. This will cover, as a minimum, the contents of

Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See our Safer Recruitment policy for more information about our safer recruitment procedures.

Mentor Supervision

All mentors have one-to-one supervision with a Consultant Mentor which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Policy Context

MindJam operates as a non-school Alternative Provision (AP). Commissioning schools/LAs retain statutory responsibilities for admissions, attendance registers/coding, exclusions and Children Missing Education (CME). MindJam provides same-day safeguarding/attendance information to commissioners (where applicable) and aligns procedures with KCSIE and local safeguarding partner arrangements.

This policy relates to the following legislative requirements and standards:

- Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2026\)](#).
- DfE Non-school alternative provision: voluntary national standards (31 Aug 2025) — adopted as [provider name] benchmarks ahead of mandation;
- Out-of-school settings (OOSS) safeguarding code (as applicable to AP context)
- [The Children Act 1989](#) (and [2004 amendment](#))
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#),
- [Statutory guidance on FGM](#),
- [The Rehabilitation of Offenders Act 1974](#),
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#),
- [Statutory guidance on the Prevent duty](#),
- [The Human Rights Act 1998](#),
- [The Equality Act 2010](#),
- [The Public Sector Equality Duty \(PSED\)](#)

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse 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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of 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
- 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.

Neglect is 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes providing same-day information to the commissioning school/LA, who lead statutory register actions and CME escalation. MindJam contributes to enquiries and records contact attempts and risks.

Staff/mentors will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage. If a staff member/mentor suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff/mentor suspects CCE, they will discuss this with the HoS. The HoS will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff/mentor suspects CSE, they will discuss this with the HoS. The HoS will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our provision has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, 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
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff/mentors have any concerns about child-on-child abuse, or a child makes a report to them, they must report to the HoS.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The HoS and deputy will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the HoS will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse, and will be handled and escalated as such. All staff/mentors will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff/mentors have a concern, they will speak to the HoS, who will activate local safeguarding procedures.

FGM

The HoS will make sure that staff/mentors have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

This policy sets out the procedures to be followed if a staff member or mentor discovers that an act of FGM appears to have been carried out or suspects that a mentee is at risk of FGM.

Indicators that FGM has already occurred include:

- A mentee confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/mentee already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a mentee may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a trusted adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff/mentors will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff or mentor suspects that a mentee is being forced into marriage, they will report this to the HoS.

The HoS will:

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

Safeguarding Women and Girls

We are committed to providing a safe, supportive, and inclusive online environment where every child feels valued, respected, and protected. We recognise that women and girls can face particular safeguarding risks, including online harassment, grooming, sexual exploitation, coercion, image-based abuse, and gender-based violence. We are committed to understanding these risks and responding to them promptly and appropriately.

We believe that everyone has the right to take part in our online provision without fear of abuse, discrimination, or harassment. We actively promote respect, kindness, equality, and positive relationships, and we challenge behaviour, language, or attitudes that could place children at risk or contribute to harmful gender stereotypes.

All members of our team receive safeguarding training to help them recognise concerns, respond sensitively to disclosures, and follow our safeguarding procedures. Any concerns about the safety or wellbeing of a child will always be taken seriously, recorded, and acted upon in line with our safeguarding policy and relevant statutory guidance.

As an online provision, we are committed to creating safe digital spaces. We have clear expectations for behaviour, appropriate moderation, and straightforward ways for children and adults to report any concerns. We also work with parents, carers, schools, and other agencies where appropriate to help ensure children receive the support they need.

Above all, we are committed to listening to children, taking their concerns seriously, and creating an environment where every child feels safe, heard, and empowered to speak up if something doesn't feel right.

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

MindJam has a duty to prevent children from becoming involved with or supporting terrorism. The HoS will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff/mentors have access to appropriate training to equip them to identify children at risk.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff/mentors will be alert to changes in mentees' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a child is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff/mentors should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in this policy, including discussing their concerns with the HoS.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school/setting.

If a victim reports an incident, it is essential that staff/mentors make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff/mentors will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

- Consider if there are wider cultural issues within MindJam that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff/mentors should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff/mentors have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school/setting
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

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

Staff/mentors will be aware of these indicators and risk factors. If a member of staff or mentor has a concern about a mentee being involved in, or at risk of, serious violence, they will report this to the HoS.

This appendix is not an exhaustive list and we are aware of other factors which may also impact on a child.

Appendix 3

Body Map Guidance

Body Maps should be used to document and illustrate visible signs of harm and physical injuries. Always use a black pen (never a pencil) and do not use correction fluid or any other eraser. Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

*At no time should an individual member of staff take photographic evidence of any injuries or marks to a child's person, the body map below should be used. Any concerns should be reported and recorded without delay to the Customer Service Centre or the child's social worker if already an open case to social care.

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

Ensure First Aid is provided where required and then recorded appropriately.

A copy of the body map should be kept on the child's concern/confidential file.

Appendix 4

Guidance

- [Lincolnshire Safeguarding Children Partnership Multi-Agency Procedures](#)
- [Working Together to Safeguard Children & Young People](#)
- [Information Sharing Document 2018](#)
- [What to do if you're worried a child is being abused 2015](#)
- [Children Act 1989](#) and [Children Act 2004](#)
- [Guidance for Safer Working Practice for those Adults who work with Children and Young People](#)
- <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
- [Sexual violence and sexual harassment between children in schools and colleges](#)

Prevent

Prevent Support Officer, Lincolnshire County Council, 01522 555367,
prevent@lincolnshire.gov.uk

PREVENT Officer, East Midlands Special Operations Unit – Special Branch, 01522 558304,
Email: prevent@lincs.pnn.police.uk

Online Safety Incidents

National helpline

[Safer internet Helpline](#)

Early Help Team

TACadmin@lincolnshire.gov.uk www.lincolnshire.gov.uk/tac
earlyhelpconsultants@lincolnshire.gov.uk

Training Materials

LSCP Online and face to face Safeguarding Training courses including Safer Recruitment training: [LSCP Training](#)

LCC Safeguarding in Schools Training Package safeguardingschools@lincolnshire.gov.uk

Safeguarding Governor Training governorsupport@lincolnshire.gov.uk

Prevent Training; All staff can undertake e-learning which is equivalent to WRAP 2 via the LSCP Training

In addition free face to face Prevent Awareness training is available through contacting either of the following:

- Lincolnshire Police, Prevent Officer, 01522 558304, prevent@lincs.pnn.police.uk.school
- Lincolnshire County Council, Prevent Officer, 01522 555367, prevent@lincolnshire.gov.uk

Appendix 5: Local Authority Information

For specific reporting and referral guidance within a local area, please refer to the relevant Local Authority section below.

Norfolk

The first point of contact for settings regarding concerns and/or allegation issues is via the **Local Authority Education Duty Desk on 01603 307797**.

A Duty Advisor (not a LADO) will give advice and guidance on next steps. If the advice is to make a referral to the LADO service then the **LADO referral form** should be completed.

The completed LADO referral form is then sent via email to: LADO@norfolk.gov.uk.

Norfolk Procedure for reporting safeguarding concerns to commissioners/schools

Where there are safeguarding concerns the commissioner/school should be informed without delay, where the child:

- is on a school roll, contact the DSL at the home school
- is under the remit of the Transitional Education Service - Norfolk Schools and Learning Providers - Norfolk County Council, contact the relevant adviser/key contact
- is in care, and the placement has been commissioned by the Virtual School for Children in Care and Previously in Care - Schools (norfolk.gov.uk), contact the relevant adviser/key contact
- is electively home-educated, contact an adviser within Home Education - Schools (norfolk.gov.uk)

Contacting The Children's Advice and Duty Service (CADS)

We will contact CADS when there are concerns about a child's safety or wellbeing, and we believe they may be at risk of harm. This includes:

- Immediate Safeguarding Concerns - where a child is at risk of significant harm, including physical, emotional, sexual abuse, or neglect.
- Escalating Concerns - Where previous support or interventions have not improved the situation and concerns are increasing.

- Concerns About Parenting Capacity - Where a parent or carer's ability to meet a child's needs is compromised due to issues such as substance misuse, mental health, or domestic abuse.
- Professional Consultation - Where the situation is complex and you require advice or guidance on appropriate next steps.

We will contact CADS on their direct line: 0344 800 8021.

We will choose from the following options:

- Option 1 -the child or young person is currently being supported by a Social Worker or Family Practitioner.
- Option 2 -your call relates to Child Exploitation.
- Option 3 -your call relates to Domestic Abuse.

For all other Safeguarding Concerns please hold until your call is answered.

This is a summarised account of the guidance from Norfolk County Council. Please refer to the in-depth guidance shared with you in your drive. If you have any questions, please contact MindJam Head of Safeguarding.