

## CM11 Child and Vulnerable Adults Safeguarding Policy

It is the policy of The Nisai Group to recognise the responsibility to have arrangements in place to safeguard and promote the welfare of students under section 175 of Education Act 2002, the Child Act 2004, the Care Act 2014, the Education (Independent School Standards) Regulations 2014, the Non-maintained Special Schools (England) Regulation 2015 and the "Keeping Children Safe in Education" (KCSIE) Statutory Guidance which was issued in September 2016 and updated in September 2023 including Annex A which carries important additional information on specific forms of abuse and safeguarding issues. All staff on joining Nisai Group will be required to read and understand KCSIE Part One and Annex A, and sign a document to that effect, that will be kept on central files by HR manager.

Through their day-to-day contact with students and contact with families/carers, employees at Nisai Group have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to the appropriate agency via the referring customer. This policy sets out how our Senior Management Team discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at Nisai Group.

### There are four main elements to our policy:

**PREVENTION** through the teaching and pastoral support offered to students and the creation and maintenance of a whole academy protective ethos.

**PROCEDURES** for identifying and reporting cases, or suspected cases of abuse.

**SUPPORT TO STUDENTS** who may have been abused.

### PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN

Our policy applies to all staff working at Nisai Group, including teachers, mentors, administration, technical support and sales people who may come into contact with pupils, all of whom can be the first point of disclosure for a child. Concerned parents/carers may also contact us directly.

#### Definition:

Child: A young person under the age of 18.

An Adult at risk: An adult at risk is an individual aged 18 years and over who:

- (a) has needs for care and support (whether or not the local authority is meeting any of those needs) AND;
- (b) is experiencing, or at risk of, abuse or neglect, AND;
- (c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The Principles of Adult Safeguarding England (Care Act 2014)

The Act's principles are:

- Empowerment - People being supported and encouraged to make their own decisions
- Prevention – It is better to take appropriate action before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented.
- Protection – Support and representation for those in greatest need.
- Partnership – Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability – Accountability and transparency in delivering safeguarding.

#### Raising concerns:

In all instances, **Nisai will escalate all disclosures and concerns immediately to the main Customer Contact who arranged/commissioned the Nisai provision for the student. The customer should then initiate their own Safeguarding Protocols.**

In the event of the inability to reach the Customer Contact then we would contact the person responsible for Safeguarding within the referring school or from the specific Local Authority. If a student is home educated and the parent/carer is the customer contact, if a disclosure or concern is about parent/carer funding the provision, we would escalate directly to the person responsible for Safeguarding within the student's local authority.

## **Nisai Staff Involved with Safeguarding Responsibilities**

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Those named above have received appropriate training. The DSL and their deputies will attend all whole staff training and undertake additional formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year (for example meetings with other DSL, via e-bulletins, keeping up to date with safeguarding developments). All Nisai staff will receive training at least every year, with ongoing updates throughout the year. Training will always include a reminder of Nisai's referral processes.

### **1.0 Prevention**

We recognise that high self-esteem, confidence, supportive friends and good communication with a trusted adult, help to protect children.

Nisai Group will therefore:

1. Establish and maintain an ethos where students feel secure and are encouraged to talk and are listened to.
2. Ensure students know that there are adults at Nisai whom they can approach if they are worried or in difficulty.
3. Include information and guidance is provided within the Nisai Virtual Academy Student Portal about who to turn to for help.
4. Include examples of staying safe online and give clear lines of communication to responsible persons (parents/carers, tutors) if any suspicion is aroused.
5. Ensure students have access to and are able to complete and understand the "E-Safety" course provided by Nisai.

### **2.0 Procedures**

We recognise that a member of our senior management team will take on the role of Child Protection Officer.

The Senior Member of Staff for Child Protection will ensure that they:

1. Have undertaken as a minimum, a two-day child protection training course, accredited by the Area Child Protection Committee.
2. Ensures this training is updated every two years in accordance with government guidance.
3. Recognises the importance of the role of the DSL and ensure s/he has the time and training to undertake her/his duties.
4. Ensures there are contingency arrangements, should the designated member of staff not be available.
5. Ensures that ALL such suspected cases are reported to the referring customer contacts.
6. Ensures that the designated member of staff will take advice from a child protection specialist when managing complex cases.
7. Ensure, on an annual basis, that a review of the Safeguarding procedures are compliant with any new legislation and to the highest standards. (See Appendix 4)
8. Ensure all members of Nisai Group Board receive annual Safeguarding training in line with KCSIE advice.

The Role of the Senior Management Team will be to ensure that employees will:

1. Know the name of the designated members of the team and their role
2. Know that they have an individual responsibility for referring child protection concerns using the proper channels and within appropriate timescales.
3. Know and understand Nisai Learning Child Protection procedures.
4. Provide training for all staff from the point of their induction, and updated every three years at a minimum, so that they know:
  - their personal responsibility,
  - the need to be vigilant in identifying cases of abuse

- how to support and to respond to a child who tells of abuse
5. Undertake appropriate discussion with the customer prior to involvement of another agency unless the circumstances preclude this.
  6. Ensure that all staff recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to students, and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.

#### Liaison with Other Agencies

Nisai will:

1. Work to develop effective links with the Customers and relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance and written reports at initial case conferences, core groups and child protection review conferences;
2. Notify the Customer if:
  - It should have to exclude a student on the child protection register (whether fixed term or permanently);
  - There is an unexplained absence of a student on the child protection register of more than two days duration from Nisai Learning (or one day following a weekend); or as agreed as part of any child protection or core group plan.
  - Establish and maintain good understanding of local Child Protection Boards and comply with all local requirements relating to procedures and contacting key personnel.

#### Record Keeping

Nisai will:

1. Keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to the customer immediately.
2. Ensure all records are kept secure

#### Confidentiality and information sharing

1. Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager.
2. The CEO or DSL will disclose any information about a student to other members of staff on a need-to-know basis only.
3. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
4. All staff must be aware that they cannot promise a child to keep secrets.

#### Communication with Parents

Nisai will:

1. Ensure that parents have an understanding of the responsibility placed on Nisai Group and staff for child protection by setting out its obligations on the Nisai web site.

### 3.0 Supporting the Student at Risk

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame.

Nisai may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when learning their behaviour may be challenging and defiant or they may be withdrawn.

We recognise that some children actually adopt abusive behaviours and that this must be escalated to the referring customers who can then facilitate appropriate support and intervention.

Nisai will endeavor to support the students through:

1. The content of the curriculum to encourage self-esteem and self- motivation.
2. The Nisai ethos which (i) promotes a positive, supportive and secure environment (ii) gives students a sense of being valued.
3. Nisai's behaviour policy is aimed at supporting vulnerable students in the academy. All staff will agree on a consistent approach, which focuses on the behaviour of the offence committed by the student but does not damage the student's sense of self-worth. Nisai will ensure that the student knows that some behaviour is unacceptable but s/he is valued.
4. Liaison with the Customer and other agencies which support the student such as Social Services, Child and Adolescent Mental Health Services, the Educational Psychology Service, Behaviour Support Services and the Education Welfare Service when requested.
5. A commitment to develop productive and supportive relationships with parents whenever it is in a student's best interest to do so and with agreement of the Customer.
6. Recognition that children living in a home environment where there is domestic violence, drug or alcohol abuse are vulnerable and in need of support and protection.
7. Vigilantly monitoring children's welfare, keeping records and notifying the Customer as soon as there is a recurrence of a concern.

8. Recognise that grooming of children is becoming an increasing area of concern, and that all staff are aware of techniques employed by such predators and can report their suspicions to senior staff in a professional and confidential manner.
9. Treat all allegations of child-on-child abuse swiftly and decisively.
10. Fully investigate any allegation made about staff and senior managers direct to the local LADO, or in extreme circumstances, to the Police.
11. Identify any changes in a child's mental health, and take appropriate action, including the prompt escalation to the referring Customer.
12. Nisai have appropriate filtering and monitoring systems in place and regularly review their effectiveness.

## **Potential Signs and Indicators of Abuse and Neglect**

### **Neglect**

- Inadequate or inappropriate clothing
- Appears underweight and unwell and seems constantly hungry
- Failure to thrive physically and appears tired and listless
- Dirty or unhygienic appearance
- Frequent unexplained absences from School
- Lack of parental supervision

### **Physical Abuse**

- Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury
- Injuries in unexpected places or that are not typical of normal childhood injuries or accidents
- Covering up, e.g. wearing long sleeves in summer
- High frequency of injuries
- Parents seem unconcerned or fail to seek adequate medical treatment

### **Sexual Abuse**

- Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age / stage of development
- Sexual risk taking behaviour including involvement in sexual exploitation / older boyfriend or girlfriend
- Continual inappropriate or excessive masturbation
- Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy
- Unwillingness to undress for Movement, Dance classes

### **Emotional Abuse**

- Developmental delay
- Attachment difficulties with parents and others
- Withdrawal and low self-esteem

### **Indirect Indicators of Abuse & Neglect**

- Sudden changes in behaviour
- Withdrawal and low self-esteem
- Eating disorders
- Aggressive behaviour towards others
- Sudden unexplained absences from School
- Drug / alcohol misuse
- Running away / going missing

## **Drug Use and Child Protection**

The discovery that a young person is using illegal drugs is not necessarily sufficient in itself to initiate child protection proceedings but Nisai will ensure that the customer is alerted of any findings or reports.

### **Children of Drug Using Parents**

Nisai will escalate all concerns to customers when the academy receives reliable information about drug and alcohol abuse by a child's parents/carers.

## Prevent, Radicalisation and Extremism

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology.

Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with the DSL/Safeguarding Officer if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

Radicalisation of young people is now a mainstream Government concern, and there is a comprehensive strategy to counter this threat to both individuals and the greater community called "Prevent". This has specific guidance for schools and internet providers, and Nisai fully complies with this initiative, by making resources available to both students and staff to discuss this critical aspect of modern life.

The following extracts from the "Prevent" document highlight the aspects that Nisai tackle in their quest for excellence in teaching for their students:

- Ensure that all Nisai staff know what to do when they see signs that a child is at risk of Radicalisation.
- Establish a set of standards for staff which clarifies obligations regarding extremism.
- Assist customers and other agencies, including Channel, to identify children at risk of Radicalisation and take necessary steps to protect them from harm.

Nisai recognises the positive contribution it can make towards protecting its students from Radicalisation to violent extremism. Nisai will continue to empower its students to create communities that are resilient to extremism and protecting the well-being of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

**So called 'honour-based' abuse - which includes FGM, Forced Marriage and Breast Ironing:** encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of honour-based abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Staff need to be alert to the possibility of a child being at risk of honour-based abuse, or already having suffered honour-based abuse.

Staff must inform the DSL if they have concerns about a child.

### Female Genital Mutilation

This is the description of surgical total or partial removal of external female genitalia or other injury to the genital organs for non-medical reasons, and is a violation of the human rights of girls and women. The World Health Organisation has been highly critical of the practice, and it was prohibited by the Female Genital Mutilation Act (2003) c.31. If a child under the age of 18 discloses to a member of Nisai Staff then this must be escalated to the DSL immediately who then must inform the customer or call the Police using 101 number.

### Breast Ironing

This is where young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. The custom uses large stones, a hammer or spatulas that have been heated over scorching coals to compress the breast tissue, or an elastic belt to press the breasts to prevent them from growing in girls as young as 9 years old. Much like Female Genital Mutilation (FGM), breast-ironing has been identified by the UN as one of five under-reported crimes relating to female-to-female/gender-based violence.

The practice is performed usually by mothers and female relatives, and it is believed that by carrying out this act:

- young girls will be protected from harassment, rape, abduction
- it will prevent early pregnancy that would tarnish the family name
- it will allow the girl to pursue education rather than be forced into early marriage
- it will delay pregnancy by "removing" signs of puberty
- girls may not appear sexually attractive to men

Most at risk: Young pubescent girls usually aged between 9 – 15 years old. It is a well-kept secret between the young girl and her female relatives who are likely to carry out the practice.

## **Forced Marriage**

The Forced Marriage (Civil Protection) Act 2007 was introduced to prevent young people from being forced into marriage without their free and full consent. Any suspicions from actions or disclosure should be reported to the Forced Marriage Unit (FMU) on 02070080151.

### **Handling a nude or semi-nude image or video incident:**

In the event of a student disclosing an event of this nature, the DSL should escalate and report to the customer at the earliest opportunity.

The guidance relates to the taking, sending or sharing indecent, sexually explicit images or videos of children (under the age of 18). This may be via social networking sites and instant messaging apps and services.

Behaviours linked to consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Nisai and staff are clear that nude images or videos of children are illegal. It may have extremely damaging and long-lasting consequences. Nisai understands that not all incidents are as a result of grooming by a perpetrator, and that some incidents are initiated by the child, as a demonstration of body confidence, body positivity, or maybe as part of an age-appropriate relationship. Nisai have a responsibility to work with children, their parents and carers in ensuring that all pupils are fully aware of the risks, dangers and possible repercussions of sharing nude images and videos.

In the event of a student advising a member of Nisai staff of an incident of this nature, this disclosure must be reported to the Customer by the DSL at the earliest opportunity.

The Nisai staff member should NOT view the imagery. They should advise the student that they will be alerting the Customer and reassure the student that they will be supported, and appropriate action taken.

## **Upskirting**

Upskirting occurs when someone takes a picture under a person's clothing (not necessarily a skirt) without permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

In the event of a student disclosing an event of this nature, the DSL should escalate and report to the customer at the earliest opportunity.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse 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. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CSE and CCE do not always involve physical contact; it can also occur through the use of technology.

Nisai staff will ensure that any suspicion or disclosure of events relating to CSE/CCE are reported to the DSL who will then report all findings to the Customer or in extreme cases, the Police.

### **Child Criminal Exploitation (CCE)**

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

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

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

Some of the following can be indicators of CCE:

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

## **Child Sexual Exploitation (CSE)**

CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex.

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

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

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

## **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] 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 criminal activity in a number of locations including schools, colleges, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes, (both from home and school).

Staff must inform the DSL if they have concerns about a child.

## **Missing From Education**

A child going absent/missing from education, particularly repeatedly and/or for prolonged periods, is a potential indicator of abuse or neglect. All staff are aware that children who are absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage.

Customers receive an automated non-attendance alert for when students do not attend a live scheduled online lesson. For PLSP students, customers receive a weekly report which would include absences or the inability to visit.

All Nisai staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage.

Nisai customers are able to see live attendance data and additionally attendance concerns are escalated by the Customer and Student Support Team direct to the referring customer.

## **Child-on-Child abuse:**

Children can abuse other children. This was generally referred to as peer-on-peer abuse but has been amended to child-on-child abuse and can take many forms. This can include, but is not limited to, bullying (including online bullying) within intimate partner relationships; sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking,

biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

All Nisai staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls.

Behaviours by students should never be passed off as 'banter' or 'part of growing up'. The DfE states child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

### **Sexual violence and sexual harassment between children:**

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Nisai staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Staff must inform the Designated Safeguarding Lead if they have concerns about a child.

The DSL will follow Part Five of Keeping Children Safe in Education 2023: Child-on-child sexual violence and sexual harassment, with consideration of

- Managing internally
- Early Help
- MASH referral
- Reporting to the police.  
A MASH referral would always be made when there is a report to police.

### **Signs and Indicators of Abuse and Neglect in Adults**

An adult may confide to a member of staff within Nisai or a fellow student that they are experiencing abuse. Similarly, others may suspect that this is the case. There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored. The signs and symptoms include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Belongings or money going missing.
- Changes in attendance. You may notice that a student has been absent from classes and is not responding to correspondence from staff
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person
- Self-harm.
- A fear of a particular group of people or individual
- A parent/carer always speaks for the person and doesn't allow them to make their own choices.

### **Online Safety – including filtering and monitoring**

Nisai have appropriate filtering and monitoring systems in place and regularly review their effectiveness. We are directly responsible for ensuring we have the appropriate level of security protection procedures in place in order to secure our systems, staff and learners and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

For the Nisai systems and student portal, Nisai Virtual Academy, security is a fundamental part of the whole Nisai structure. When creating our systems and applications we carry out an intensive preparation and research process which involves all aspects of online learning, access and security. We consider who will need access to our systems, for what purposes and the different



permission requirements for different staff roles. We evaluate any potential risks for students and for staff and also for data security purposes.

Nisai systems, infrastructure and networks are regularly monitored and maintained with regular risk assessments and security deployments being installed. All processes are regularly reviewed, updated and shared as and when necessary.

To access Nisai, students need a computer/laptop or tablet and an internet connection. These are not provided by Nisai as standard and students use their own machines which are either provided by their own school or families. Customers/families should ensure that students have all the correct applications such as virus protection, security and any parental controls based on the age range of the student.

If a student leases a laptop from Nisai then this is secured/locked down and has filtering software installed so that we can monitor the sites they are accessing and we would be alerted should they try to access any inappropriate or illegal websites.

Students are given access to the Nisai Virtual Academy (NVA) with a personalised and unique username and password. Once they have access, they will see all the areas of the NVA including My Learning Zone, Student Email, My assignments, Wellbeing Centre and Clubs and Societies. We do have the ability to restrict students from viewing certain areas of the NVA if required. The student email system is restricted to be within Nisai so students cannot send or receive external emails.

Within the learning zone, students can only access the classrooms that they are enrolled in. They cannot enter a classroom until the teacher is present to allow entry, and once a teacher leaves the class is closed down. All of our lessons are recorded for quality purposes but also to allow us to view the lesson for any evidence in the event of feedback or complaint.

As part of the Nisai induction, students are shown and given access to complete an E-Safety training course and on the wellbeing area of the portal, online security and safety is regularly highlighted.

The social aspect of the NVA is mainly within the classroom area, however the student portal has a clubs and societies area where, if they wish, students can join online forums relating to specific areas of interest. Each club has its own purpose e.g., Critter corner where students can share pictures of pets and other students can like or comment. All clubs are moderated by a staff member and students cannot create clubs themselves.

Within the classroom itself, the security and visibility is very controlled. Teachers are responsible for the functionality and interactivity of the lesson and control who can do what. Lessons are conducted using audio and visual aids. We do not use webcams at all in our lessons. With written communication, we are able to clear the public text chat area if anything inappropriate was to be put in there and students can also privately message the teacher with all logs being stored securely on our servers.

#### **4. Preventing Unsuitable People from Working with Children**

Nisai operates using strict safe recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to appropriate legislation. Nisai will consult with the designated LA Officer for Child Protection (LADO) in the event of an allegation being made against a member of staff.

Nisai will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at Nisai and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Nisai will ensure that all staff are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents.

Nisai will ensure that staff are aware that sexual relationships with students are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of position of trust).

Nisai staff are made aware of the need to “self-monitor” colleagues in the workplace, and immediately report any concerns to the appropriate line manager or the Designated Safeguarding Lead.

##### **Managing Allegations against Staff**

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for all Nisai students. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

We will take all possible steps to safeguard our students and to ensure that all adults at Nisai are safe to work with children.

If an allegation is made or a low level concern is highlighted, or information is received about an adult who works at Nisai either from situations within the workplace or externally (transferable risk) which indicates to us that they may be unsuitable to work with children, the member of staff receiving the information should inform the Nisai CEO immediately. Should a customer have a concern about a member of Nisai staff then they should contact [safeguarding@nisai.com](mailto:safeguarding@nisai.com) in the first and immediate instance or contact 0208 424 8475 and ask to speak to the DSL.

If it is about the sole proprietor of Nisai then this needs to be raised with the Designated Safeguarding Lead or Chair of Governors for Nisai Group.

The DSL will then seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO. Any member of staff who does not feel confident to

raise their concerns with the Nisai CEO or Chair of Governors should contact the LADO directly.

Additionally, the NSPCC [whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – the line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Nisai has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at Nisai, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service. All actions must be compatible with UK GDPR regulations.

## 5. Incident Report

Below is a copy of the Nisai Group Incident Reporting Form. All Nisai staff are given training in how to complete the form and are advised of the process.

Your name:	Your position:
<b>The child's details</b>	
Name:	
Address/Phone number:	
Date of birth:	
Other relevant details about the child (i.e. barriers, reason for referral):	
Parent/Carer details:	
Customer details:	
<b>Details of concerns</b>	
What are you recording:	
Date and time of disclosure:	
Date and time of incident:	
Details of the concerns and communications:	
Signed:	Date:

## 6. Other Related Policies

NVA Online Delivery – Risk Assessment

CM12 - Behaviour Policy

Our policy on behaviour is set out in a separate document and is reviewed annually by the governing body.

CM5 - Equality, Racial Equality, Diversity and Inclusion Policy

Our equality policy is set out in a separate document and is reviewed annually by the governing body. We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

## Senior Management Teams Child Protection Responsibilities

The Senior Management Team fully recognises its responsibilities with regards to child protection and safeguarding. It will:

- Designate a Senior Staff Member for child protection who will oversee Nisai Learning's child protection policy and practice and champion child protection issues.
- Ensure an annual report is made to the Senior Management team.
- Ensure that this policy is annually reviewed and updated.
- Ensure Nisai have appropriate filtering and monitoring systems in place and regularly review their effectiveness.

Where services or activities are provided separately by another body the Senior Management Team will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with Nisai on these matters where appropriate.

### Key contacts, national and local guidance

- KCSIE Keeping Children Safe in Education 2023 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- DfE – Mental Health and Behaviour in schools <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- NSPCC, undertaking remote teaching and learning safely <https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>
- DfE: Preventing Bullying (includes cyber bullying advice) <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>  
Meeting digital and technology standards in schools and colleges (includes filtering & monitoring and cyber security standards) [https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges\\_](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges_)
- NPCC: When to call the police <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>
- Home Office: Criminal exploitation of children and vulnerable adults: county lines <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- Home Office: Preventing youth violence and gang involvement [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)
- DfE: Safeguarding and remote education <https://www.gov.uk/guidance/safeguarding-and-remote-education>
- Childnet cyberbullying guidance <https://www.childnet.com/resources/cyberbullying-guidance-for-schools>
- The Care Act 2014 <https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>



Signed:

Name: Nicholas Robin.

Role: Safeguarding Lead and Board

Date: 11/09/2023

To be reviewed: September 2024