

CM11 – Children and Vulnerable Adults Safeguarding Policy

Nisai Group acknowledges the responsibility to ensure arrangements are in place to safeguard and promote the welfare of students. This follows the statutory guidance issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulation 2015, and the Education and Training (Welfare of Children) Act 2021.

The purpose of our Safeguarding policy at Nisai Group is to ensure that we:

- Are committed to developing a robust safeguarding culture of vigilance and challenge.
- Build resilience by raising awareness of safeguarding and child protection issues, and equipping students with the language and skills to keep themselves safe.
- Establish a safe environment in which students can learn and develop within an ethos of openness and where they are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- Prevent unsuitable people from working with our students by ensuring we practise safe recruitment in checking the suitability of all employees to work at Nisai Group and maintain an active, ongoing vigilance in line with our safeguarding culture.

We are committed to adhering to the procedures detailed in “Keeping Children Safe in Education” (KCSIE) Statutory Guidance and Working Together to Safeguard Children 2023 by knowing and understanding that:

- Safeguarding and promoting the welfare of students is everyone’s responsibility
- Everyone who comes into contact with students and their families has a role to play.
- Everyone should ensure that their approach is student-centred considering, at all times, what is in the best interests of the student and that the voice of the student is evident.
- By establishing a safe environment, we enable our students to learn and develop within an ethos of openness.
- No single practitioner can have the full picture of a child’s needs and circumstances.
- If students and families are to receive the right help at the right time, everyone must play their role in identifying concerns, sharing information and taking prompt action.
- The importance of providing crucial information to students via our wellbeing centre on topics such as healthy relationships, online safety, sexting, child-on-child abuse as well as ‘abuse outside the home’, County Lines, Child Criminal Exploitation including Child Sexual Exploitation and other contextualised safeguarding issues and have a balanced curriculum offer available for customers to enrol students on including PSHE.
- We have awareness of our staff’s knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our practice.

This policy:

- applies to all staff working at Nisai Group, including teachers, mentors, administration, technical support and salespeople 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. It provides full guidance and should be read in conjunction with the documents, **Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023**. The Policy is available on our main website www.nisai.com and is also available on request.
- sets out how the Senior Leadership Team discharges its statutory responsibilities relating to safeguarding and promoting the welfare of students at Nisai. Our policy applies to all staff including Governors.
- is provided to all staff on an annual basis and for new employees at the start of their employment, alongside our Staff code of conduct policy and KCSIE Part One and Annex A. Staff are required to sign a document confirming they have read and understood this guidance and this is recorded and stored on our HR platform. This will be reviewed in full on an annual basis or sooner should legislation/guidance change.

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, neglect and exploitation, AND;
- (c) as a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse, neglect and exploitation.

An adult is anyone aged 18 or over. Where someone is 18 or over but is still receiving children’s services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements.

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 and informed consent.
- 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, abuse and exploitation.
- Accountability – Accountability and transparency in delivering safeguarding.

Our Ethos and Culture

Our students' welfare is of paramount importance to all of us at Nisai Group. We understand our statutory duty to safeguard and promote the welfare of our students, and we maintain a professional attitude of 'it could happen here' where safeguarding is concerned. We expect ALL staff to share our commitment in maintaining a safe environment and a culture of vigilance. Students are encouraged to talk openly with staff if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never feel ashamed for making a report.

We make every effort to listen to and capture the voice of students to enable us to have a clear understanding of their backgrounds and experiences. This includes understanding that the child's behaviours and barriers and feedback from staff, also form part of the student voice. Ultimately, we have the best interests of students at the heart of all our systems, processes and policies at Nisai.

We are aware that our students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated or are being threatened. This could be due to vulnerability, disability and/or sexual orientation or language barriers. This does not prevent our staff from using professional curiosity and speaking to the DSL if they have any concerns about a student. Our staff determine how best to build trusted relationships which facilitate and support this communication.

Our staff, in their day-to-day contact with students and their families/carers, have a crucial role in noticing indicators of possible abuse, neglect or exploitation and ensuring that the correct and appropriate escalation procedures are followed as a matter of urgency. Everyone has a responsibility to **act without delay** to protect our students, by reporting anything to our Safeguarding Team that might suggest a child is being abused, neglected or exploited. We work closely and in partnership with all our customers, families and other agencies and have rigid escalation procedures.

All staff are encouraged to report any concerns that they have and not to see these as insignificant. On occasions, an escalation to the customer is justified by a single welfare incident. However, concerns can accumulate over time and in conjunction with local awareness, this can build a picture of harm, particularly true in cases of abuse or neglect.

We know that it is essential that our staff record and pass on any concerns in a timely manner and in accordance with this policy, to allow the DSL/DDSL to build up a picture and escalate to the customer at the earliest opportunity.

We work closely with our customers and safeguarding partners and share the same goals, learn with and from each other, acknowledge and appreciate differences as well as challenging each other.

We acknowledge the three principles that as professionals we should follow when working with parents and carers:

- effective partnership and the importance of building strong, positive, trusting and co-operative relationships
- respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers
- empowering parents and carers to participate in decision making by equipping them with information, keeping them updated and directing them to further resources

We recognise the stressful and traumatic nature of safeguarding and child protection work, and support our staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate. We hold regular safeguarding supervision meetings within the safeguarding team and ensure that everyone is supported. Nisai provides an Employee Assistance Programme for all staff which includes access to counselling should that be needed. There are also organisations such as The Education Support Helpline which provides free and confidential emotional support for teachers and education staff.

We will work to develop effective and robust links with all Customers and relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including escalations, attendance, provide written reports for initial case conferences, core groups and child protection review conferences. We will establish and maintain a good understanding of local Safeguarding Boards and aim to comply with all local requirements relating to procedures and by contacting key personnel.

Nisai Staff with Safeguarding Responsibilities

(Designated Safeguarding Lead (DSL) and Deputy Safeguarding Leads (DDSL))

Our DSL/DDSL have received the appropriate safeguarding training to provide them with an understanding of their role and the knowledge and skills to carry it out. Our DDSL(s) are trained to the same level as the DSL. This training is updated at least every 2 years and, in addition to this, they regularly refresh and update their knowledge and skills throughout the year (for example meetings with other DSL, via e-bulletins, CASPAR, local authority networking webinars and keeping up to date with safeguarding developments). The Safeguarding Team is given additional time, funding, training, resources, and support needed to carry out the role effectively.

We acknowledge that a member of our senior management team will take on the role of Designated Safeguarding Lead.

This Senior Member of Staff will ensure that they:

- Have undertaken, as a minimum, a two-day child protection training course
- Ensure this training is updated every two years in accordance with government guidance.
- Recognise the importance of the role of the DSL and ensure they have the time and training to undertake their duties.
- Ensure there are contingency arrangements, should the designated member of staff not be available.
- Ensure that Supervision takes place on a frequent basis with the Safeguarding Team
- Ensure that ALL such suspected cases are reported to the referring customer contacts.
- Ensure, on an annual basis, that a review of the Safeguarding procedures are compliant with any new legislation and to the highest standards.
- 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 **all employees** will:

- Know and understand Nisai Group Safeguarding procedures.
- Know the name of the designated members of the Safeguarding Team and their role.
- Understand that they have an individual responsibility for escalating concerns using the proper channels and within appropriate timescales.
- Receive appropriate training from the point of their induction, both formal and refresher training, 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
- 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.

Safeguarding Team

Nisai Virtual Academy (NVA)
Victoria Reaney
Email: victoria.reaney@nisai.com

DDSL - Karina Eldrett
Email: karina.eldrett@nisai.com

DDSL - Lily Brewer
Email: Lily.Brewer@Nisai.com

Nisai Mentoring Programme
DDSL - Nicola Hardy
Email: Nicola.Hardy@nisai.com

During term time, the DSL/DDSL(s) are available (during office hours) for staff to discuss any safeguarding concerns. In the absence of the DSL, the DDSL(s) will take a lead on safeguarding with clear direction and support from the Senior Leadership Team.

The DSL acts as a source of support, advice, and expertise for staff.

Along with HR, the DSL maintains robust systems to monitor and record training of all staff. Update and refresher time scales are evident within the training record. Training is delivered in line with KCSIE 2025. The DSL ensures that all staff and regular visitors have appropriate safeguarding training to equip them for their role. This includes training on how to recognise indicators of concern, how to respond to a disclosure from a student and how to record and report this information accurately. The DSL ensures systems are in place to induct new staff and that they are robust and monitored and any non-compliance shared with the Senior Leadership Team.

Raising concerns and escalations:

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.

Record Keeping

DfE guidance says that all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely, accessible only by appropriate senior staff members. It is good practice to keep concerns and referrals in a separate child protection file for each child. Current/live cases are exempt from examination by parents or children unless subject to a court order. Subject Access Requests may be made for records of historic, closed issues.

Records should include:

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

Nisai will:

- Keep clear detailed written records of concerns about students (noting the date, event and action taken), even where there is no need to refer the matter to the customer immediately.
- Ensure all records are kept securely and in accordance with data protection guidance.

Confidentiality and information sharing

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

Supporting the Student at Risk

All children should be protected however, we at Nisai Group recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups:

- Children who need a social worker (Child in Need & Child Protection)
- Children who are absent from education
- Children who are Elective Home Education (EHE)
- Children requiring mental health support
- Looked after children (LAC), previously looked after children (PLAC) and care leavers
- Children with special educational needs & disabilities or health needs
- Children who are lesbian, gay, bisexual or gender questioning (LGB or gender questioning)
- Children who are young carers
- Children who are affected by parental conflict and/or domestic abuse
- Children who are refugees or asylum seekers
- Children vulnerable to/at risk of/involved in CSE/CCE

We support these groups by being:

- Vigilant
- Understanding
- Stable
- Respectful
- Informative and engaging
- Supportive.

At Nisai Group, we know that the cohort of pupils in our provision often have complex needs; we are aware of this additional risk of harm that our pupils may be vulnerable to. The DfE Guidance clarifies that when a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil including knowing where the child will be based during school hours.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth and they may feel helplessness, humiliated and have 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 adopt abusive behaviours and that this must be escalated to the referring customers who can then facilitate appropriate support and intervention.

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

Nisai Group will therefore:

- Establish and maintain an ethos where students feel secure and are encouraged to talk and are listened to.
- Ensure students know that there are staff at Nisai whom they can approach if they are worried or in difficulty.
- Include information and guidance within the Nisai Virtual Academy Student Portal and our Student Guide about who to turn to for help.
- Ensure students have access to and are able to complete and understand the "E-Safety" course provided by Nisai.

Nisai will endeavour to support the students through:

- The content of the curriculum to encourage self-esteem and self-motivation.
- The Nisai ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued.
- Nisai's behaviour policy is aimed at supporting vulnerable students. All staff 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 they are valued.
- 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.
- 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.
- 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.
- Vigilantly monitoring children's welfare, keeping records and notifying the Customer as soon as there is a recurrence of a concern.

- 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 the DSL in a professional and confidential manner.
- Treat all allegations of child-on-child abuse swiftly and decisively.
- Fully investigate any allegation made about staff and senior managers direct to the local LADO, or in extreme circumstances, to the Police.
- Identify any changes in a child's mental health, and take appropriate action, including the prompt escalation to the referring Customer.
- Nisai has appropriate filtering and monitoring systems in place and regularly review their effectiveness.

A Safer School Culture - Preventing Unsuitable People from Working with Children

We take all possible steps to safeguard our students and to ensure that the adults who work at Nisai Group are safe to work with our students. We pay full regard to 'Keeping Children Safe in Education 2025'.

Departmental Managers have undertaken appropriate training in Safer Recruitment with the NSPCC and at least one person on the interview panel will have completed this training and have an awareness of interview techniques and requirements.

Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking academic or vocational qualifications, obtaining professional references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks, prohibition checks whether they are known to the police and/or social care. Evidence of these checks is recorded on our Single Central Record. All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.

Staff who have lived or worked outside the UK will undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Induction

All staff will be made aware of the systems we have in place to support safeguarding. These are explained as part of the staff's induction, including:

- The Safeguarding policy
- The Behaviour policy
- The staff code of conduct policy
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2025.

Managing Allegations against Staff

We take all possible steps to safeguard our students and to ensure that all adults at Nisai are safe to work with children. At Nisai, we promote an open and transparent culture in which all concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that all staff are clear about professional boundaries and act within them in accordance with our ethos and values. We will ensure that all staff are aware of the need to maintain appropriate and professional boundaries in their relationships with students and parents.

Inappropriate behaviour by staff could take the following forms:

- **Physical**
For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
- **Emotional**
 - For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.
- **Sexual**
 - For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.
- **Neglect**
 - For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
- **Spiritual Abuse**
 - For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

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

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 Chief Operating Officer (COO) immediately.

The COO will exercise and be accountable for their professional judgement on the action to be taken as follows:

- If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the COO will notify the LADO.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil, these will be addressed through our own internal procedures.
- If the COO decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child safeguarding file.

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.

Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police. We understand that if we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately.

We have ensured that there is a whistleblowing policy and staff are aware of this policy and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice, and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures.

Additionally, the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding 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.

Should a customer have a concern about a member of Nisai staff then they should contact safeguarding@nisai.com in the first and immediate instance or contact 0208 424 8475 and ask to speak to the DSL or the Chief Operating Officer.

The role of all staff in Keeping Children Safe

All staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make children vulnerable and put them in danger and that often these issues overlap.

- Abuse (incl. Physical/Emotional/Sexual/Neglect)
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child on child abuse (including sexual violence and sexual harassment/sexting/harmful sexual behaviour-sharing of nude/semi-nude images & upskirting)
- Children and the court system (5-11yrs & 12-17yrs)
- Children missing from education
- Children who are absent from education
- Child missing from home or care
- Child Criminal Exploitation (CCE)
- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness and Perplexing Presentations
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness
- Mental health
- Online safety
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Trafficking

All staff have read and have a good understanding of at least part 1 of Keeping Children Safe in Education 2025 and are aware of the safeguarding link to other policies relating to their daily practice.

All staff receive appropriate safeguarding and child protection training. This training takes place at induction and is regularly updated in order to continue to provide our staff with relevant skills and knowledge to safeguard children effectively.

All staff know who the DSL/DDSL are and understand that as well as being the expert in this field, they are there to support staff should they have any concerns.

All staff are aware of their responsibility to provide a safe environment in which children can learn.

All staff are aware of indicators of abuse and neglect and understand that children can be at risk of harm at home and outside of home and online including contextualised safeguarding. Staff are confident in exercising professional curiosity and understand that knowing what to look for is vital for the early identification of abuse, neglect and exploitation, to identify cases of children who may need our help or protection. They are aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff, but especially the DSL/DDSL, consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online; this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. This includes AI generated child sexual abuse material. <https://www.iwf.org.uk/media/ceel0u4z/ai-guidance-england-final.pdf>

All staff are also mindful that disinformation, misinformation and conspiracy theories can be an online safety risk/concern.

All staff know what to do if a child tells them they are being abused, exploited, or neglected. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL who will then involve the appropriate safeguarding contact assigned by the customer. Staff never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. They are aware of their statutory reporting responsibilities and duty in relation to FGM.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

All staff know how to reassure students that they are being taken seriously and that they will be supported and kept safe. Students should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a student ever be made to feel ashamed for making a report.

All staff understand their responsibility to report concerns about the behaviour of any adult at Nisai and know that they will be listened to and taken seriously.

All staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a student's needs remain unmet or if the student is failing to thrive and in need or if the student is at risk of harm.

What is a low-level concern?

At Nisai, we promote an open and transparent culture in which all concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that all staff are clear about professional boundaries and act within them in accordance with our ethos and values.

Low level does not mean that the concern is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working at Nisai may have acted in a way that is:

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being overfriendly with children
- having favourites.
- humiliating pupils.

All staff have a good understanding of what constitutes a low-level concern, and we ensure that these low-level concerns are included as part of our staff code of conduct and safeguarding policies.

Sharing low-level concerns

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings.

If we are in any doubt as to whether information shared about a member of our staff as a low-level concern in fact meets the harms threshold, we will consult with the LADO.

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.

We will ensure that any disciplinary proceedings against staff relating to safeguarding 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.

Definitions and Indicators of Neglect, Abuse & Other Safeguarding concerns

Neglect

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 maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately dressed for the weather.
- Poor school attendance or often late for school
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Not being taken to medical appointments
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

Physical Abuse

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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

Sexual Abuse

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high

level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age / stage of development
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Bruises or scratches in the genital area.

Emotional Abuse

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment although it may occur alone.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes themselves in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as "traumatic mutism") can indicate maltreatment.

Parental response

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to their age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect

may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

Adult Safeguarding

In addition to the sections already included in this policy, categories of abuse for adults may also include but are not limited to.

Emotional or Psychological abuse - may include intimidation e.g., threats of physical harm, shouting, swearing, name calling, racist comments, deprived of normal activities or contact, humiliation, indifference, emotional blackmail.

Financial or material abuse - theft, fraud, extortion, gaining access to persons funds, or possessions.

Neglect and acts of omission -deliberate withholding of, or unintentional failure to provide care and support.

Discriminatory abuse - oppressive and prejudicial attitudes towards a person's disability, age, race, religion, sexual orientations.

Multiple or institutional abuse which includes an abusive regime or culture, ignoring a person's needs and wishes, misuse of professional power and control.

Self-Neglect - Neglecting to care for personal hygiene, health or surroundings. Living in very unclean or verminous circumstances, poor self-care, poor nutrition, isolation from family, friends and services. Failure to take medication.

Specific Safeguarding Issues

Behaviours linked to Safeguarding issues

All staff have an awareness of safeguarding issues that can put students at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Bullying, including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Child-on-Child abuse (including Sexual violence and sexual harassment)

Child-on-child abuse can occur, both physically and verbally, either online or face to face, between children of any age and sex, with a single child or group of children. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect on their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

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.

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.

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.

All staff know that if we do not challenge and support our children that this will lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe.

All victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of Nisai will not be downplayed and will be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report. We will ensure that students know that the law is in place to protect them rather than criminalise them and will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states that child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening outside of Nisai, it may be the case that it is just not being reported by the victim. As such it is important that if staff at Nisai have any concerns regarding child-on-child abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL).

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- 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 and may include an online element which facilitates, threatens and/or encourages sexual violence. 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.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- 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 nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery). Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal whilst non-consensual is illegal and abusive.
- 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; and
- 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).

Non-recent allegations

Abuse can be reported no matter how long ago it happened. Should a student disclose to Nisai that they were abused as a child, the student will be advised to report the allegation to the police. Non recent allegations made by a child, will be escalated to the relevant customer for them to report to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority children social care and the police.

Children Missing/Absent 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/county lines. It may indicate mental health problems, risk of substance abuse, risk of FGM or risk of forced marriage.

It is important that Nisai's response to persistently absent pupils and children missing education is proactive, robust and supports identifying such abuse, and in the case of absent pupils, using professional curiosity to identify the existence of any underlying safeguarding risk helps prevent the risk of them going missing in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

We understand our responsibility to provide information and to escalate attendance concerns as a matter of priority to our customers. This is carried out by the Customer and Student Support Team direct to the referring customer. Nisai customers and parents have access to our portals and are able to see live attendance data.

Additionally, our customers can nominate contacts who will receive an automated non-attendance alert for when students who have not been pre-authorised, do not attend a live scheduled online lesson. For mentoring students, customers receive a weekly report which would include absences or the inability to visit.

Children Missing from Home or Care

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse. In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

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 and/or through violence or the threat of violence.

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. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

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)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, to work in cannabis factories, forced to shoplift or pickpocket, or to threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

Some 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 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. Financially Motivated Sexual Extortion (Sextortion) is a serious form of blackmail that involves the exploitation of nude, explicit or sensitive images or videos to coerce victims into unwanted actions such as sharing further explicit imagery or paying to prevent further sharing.

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. 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.

Children and the Court System

All staff should be aware that any child involved in legal proceedings should be made known to the DSL. Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Where there is a family break up making child arrangements via the family courts following separation can be stressful and entrench conflict in families. KCSIE 2025 recommends the following guides to support young people: Young witness booklet for 5- to 11-year-olds - GOV.UK (www.gov.uk) and Young witness booklet for 12- to 17-year-olds - GOV.UK (www.gov.uk)

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff must inform the DSL if they know a child has a family member in prison.

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.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. On a wider scale, this can include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.

Children living in households where domestic abuse takes place should be considered and treated as victims of domestic abuse. Exposure to domestic abuse and/or violence can have a serious, long-lasting impact on their health, emotional well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our children/young people and escalate our concerns back to the customer as a matter of urgency.

Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation. Nisai will ensure that the customer is

alerted of any findings or reports. We will escalate all concerns to customers when the academy receives reliable information about drug and alcohol abuse by a child's parents/carers.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators of risk include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. We also recognise that in some cases 16/17 yr olds could be living independently from their parents or guardians.

In all cases, when we are made aware of situations or have any concerns, escalations will be made to the Customer for them to initiate local protocols

Honour-based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including 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 HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Staff must inform the DSL if they have any concerns.

Breast Ironing

This is where young pubescent girls' breasts are ironed, massaged and/or pounded down using 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.

Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is **illegal in the UK** and a form of child abuse with long-lasting harmful consequences. It is known by several names including "cutting", "female circumcision" or "initiation". FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 4 and 10.

The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse".

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and together they would go to the Police. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

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 the 101 number.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived cultural practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

From February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The 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 0207 0080151 or email fmf@fcdo.gov.uk

Mental Health

All staff have an important role to play in supporting the mental health and wellbeing of our pupils and are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and to offer support with signposting to professional agencies such as Mind, Calm etc whilst the Customer initiates local support networks.

Online Safety – including filtering and monitoring

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 Social Space. We do have the ability to prevent students from viewing certain areas of the NVA if required. The student email system is restricted to being 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. All 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 social space 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 use webcams at the beginning and at the end of our lessons by way of creating a rapport between teachers and students and so that they see a face behind the screen. Students do not use webcams. With written communication, we can 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.

Nisai have appropriate filtering and monitoring systems in place for all staff 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 all Nisai systems that are used by staff and students, 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 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. Nisai holds Cyber Essentials certification.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Our staff at Nisai will notify the DSL when they become aware of a private fostering arrangement who will then escalate this to the referring customer who then have a duty to check that the young person is being properly cared for, and that the arrangement is satisfactory.

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **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 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.

At Nisai Group, we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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 several possible behavioural indicators are listed below, staff should use their professional judgement and discuss with the DSL 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

Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

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 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.

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Nisai Group is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.

Nisai will escalate all concerns to the customer and work with them in terms of providing all required information to support the customer with making a Prevent referral.

Prevent Duty

All schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism". This is known as The Prevent Duty and is part of our wider safeguarding obligations. Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales. All Nisai staff complete mandatory annual training and we have support and information for students as part of our wellbeing centre

Sharing nudes and semi nudes (formerly Sexting)

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 and may include digitally manipulated and AI-generated nudes and semi-nudes.

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.

Signs and Indicators of Abuse, Neglect or exploitation in Adults

An adult may confide in 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.

Other Nisai Related Policies

NVA Online Delivery – Risk Assessment

CM12 - Behaviour Policy

CM5 - Equality, Racial Equality, Diversity and Inclusion Policy

HR10 - Whistleblowing Policy

HRM3 - Safe Recruitment Policy

SM4 - Complaints Policy

IM19 - Attendance Policy

CM14 - Anti Bullying Policy

Nisai AI Policy

Nisai Staff Code of Conduct

National Guidance

- KCSIE Keeping Children Safe in Education 2025
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working together to Safeguard Children 2023
https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf
- NSPCC <https://www.nspcc.org.uk/>
- Meeting digital and technology standards in schools and colleges (including filtering & monitoring and cyber security standards
<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>
- 0800 028 0285 and help@nspcc.org.uk
- Whistleblowing advice: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>
- General helpline: www.nspcc.org.uk/Helpline

Mind: <https://www.mind.org.uk/>

Kooth: <https://www.kooth.com/>

Papyrus: <https://www.papyrus-uk.org/suicide-prevention/>

[Teachers' Standards](#)

[Generative AI: product safety expectations - GOV.UK](#)

[Artificial Intelligence - DfE Guidance](#)

[New Definition of Extremism](#)

[Female Genital Mutilation Statutory Guidance](#)

[Guidance Forced Marriage](#)

[Protecting Children from Radicalisation: The Prevent Duty](#)

[Educate Against Hate: Educate against hate](#)

[Beyond Referrals | Contextual Safeguarding](#)

[Stop it Now](#)

[Child Sexual Exploitation Definition and Guide](#)

CEOP's Thinkuknow website www.thinkuknow.co.uk

[Criminal exploitation of children and vulnerable adults: county lines](#)

[Preventing Child Sexual Exploitation | The Children's Society.](#)

[FGM / Modern Slavery / Prevent / Forced Marriage](#)

[New Definition of Extremism](#)

[Female Genital Mutilation Statutory Guidance](#)

[Guidance Forced Marriage](#)

[Protecting Children from Radicalisation: The Prevent Duty](#)

[Educate Against Hate: Educate against hate](#)

[Online Safety](#)

[National Cyber Security Centre: National Cyber Security Centre](#)

The UK safer Internet Centre (www.saferinternet.org.uk)

National Contacts

CEOP (Child Exploitation and Online Protection) <http://ceop.police.uk/>

Professionals Online Safety Helpline – 0844 381 4772 <http://www.saferinternet.org.uk/helpline>

Internet Watch Foundation (IWF) <http://www.iwf.org.uk/>

Safer Internet Centre – helpline@saferinternet.org.uk

HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders)
www.educateagainsthate.com

Women's Aid - 24 Hour Helpline: 0870 2700 123

External Contact Details

Childline 0800 11 11 <https://www.childline.org.uk>

Crimestoppers 0800 555 111

Foreign and Commonwealth Office 0207 008 0151

Kidscape Bullying Helpline 0845 1205 204

NSPCC (NSPCC website) 0800 800 5000

NSPCC whistleblowing helpline: 0800 0280285 Email: help@nspcc.org.uk

Professional organisations who provide guidance and practical support - TES, MindEd, NSPCC

RU Safe? (Barnardo's - Child Sexual Exploitation Service) 01494 461112

Samaritans 0845 790 9090

Reviewed: September 2025

To be Reviewed: September 2026