CM11 – Children and Vulnerable Adults Safeguarding Policy

Nisai Group acknowledges its responsibility to ensure arrangements are in place to safeguard and promote the welfare of students. This includes live online teaching, mentoring, digital learning platforms, student communication tools and any related online support services. This policy reflects the statutory responsibilities and guidance arising from 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.

This policy is also written having regard to the Children's Wellbeing and Schools Act 2026, the Children Act 1989 and 2004 including Section 11 of the 2004 Act, the Care Act 2014 in respect of adults at risk, the Equality Act 2010, and the Online Safety Act 2023.

Nisai Virtual Academy is accredited under the Department for Education Online Education Accreditation Scheme and is assessed against the online education standards. Where Nisai delivers alternative provision commissioned by a school or local authority, it also has regard to the Non-School Alternative Provision Voluntary National Standards (DfE, August 2025).

The purpose of this Safeguarding Children and Vulnerable Adults Policy is to provide a clear framework for safeguarding and promoting the welfare of children and vulnerable adults, ensuring that all staff understand their responsibilities and that appropriate procedures are in place to identify, respond to and manage concerns effectively. To achieve this, 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 online learning environment where students can learn and develop within an ethos of openness, respect and digital safety, where they feel able to raise concerns and know 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 following the procedures set out in **Keeping Children Safe in Education 2026** (KCSIE) and **Working Together to Safeguard Children 2026**. We recognise and understand 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 in identifying concerns, sharing information and taking prompt action.
- All safeguarding practice must be student-centred, take account of the voice of the student and focus on their best interests.
- No single practitioner can have the full picture of a child's circumstances. Effective safeguarding relies upon timely information sharing, professional curiosity and collaborative working.
- We support students through a safe learning environment and by providing clear safeguarding information through our curriculum offer, Wellbeing Centre, Student Portal and online resources. This includes areas such as healthy relationships, online safety, digital conduct, sharing of intimate images, child-on-child abuse, abuse outside the home, child criminal exploitation, child sexual exploitation, county lines and other contextual safeguarding issues. Customers may also enrol students on additional wellbeing and safeguarding programmes, including PSHE education.
- We maintain a strong safeguarding culture through effective leadership, clear communication processes, regular safeguarding updates and continuous professional development (CPD). We monitor staff knowledge and understanding to ensure safeguarding remains a robust and embedded part of our practice.

This policy applies to all staff working at or on behalf of Nisai Group, including teachers, mentors,

administration, technical support and sales staff who may come into contact with students. Any member of staff may be the first point of disclosure for a child. Concerned parents or carers may also contact us directly. This policy provides full guidance and should be read alongside **Keeping Children Safe in Education 2026** and **Working Together to Safeguard Children 2026**.

The policy is available on our main website www.nisai.com and on request. It sets out how the Senior Leadership Team discharges its statutory responsibilities relating to safeguarding and promoting the welfare of students at Nisai.

This policy 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. From 1 September 2026, all staff are expected to read Part One of KCSIE in full. The Part One overview may be used as a quick-reference aid, but it does not replace the requirement to read Part One. 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. Induction, annual sign-off, HR training records and Board oversight checks will evidence completion. This will be reviewed in full on an annual basis or sooner should legislation/guidance change.

Roles and Responsibilities

Nisai Group is committed to maintaining effective safeguarding arrangements and a culture in which safeguarding is prioritised throughout the organisation.

The Chief Executive Officer provides strategic oversight and challenge to safeguarding arrangements, including the effectiveness of the DSL function, safeguarding culture and organisational compliance.

The Senior Leadership Team has overall responsibility for ensuring that safeguarding and child protection arrangements are effective, legally compliant and embedded throughout the organisation. They provide strategic leadership, oversight and accountability for safeguarding practice, policies, procedures and culture. They receive regular safeguarding reports, monitor safeguarding performance, review safeguarding risks and outcomes, and hold managers and safeguarding leads to account for the effectiveness of safeguarding systems and processes.

For the avoidance of doubt, the Designated Safeguarding Lead role is fulfilled by the Chief Operating Officer. In carrying out these responsibilities, the Chief Operating Officer acts as the organisation's Designated Safeguarding Lead and is supported by appropriately trained Deputy Designated Safeguarding Leads.

The Designated Safeguarding Lead (DSL) has lead responsibility for safeguarding and child protection across Nisai. This includes oversight of safeguarding procedures, referrals, record keeping, staff training, quality assurance activities and multi-agency working. Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL and provide ongoing support and cover when required.

Managers at all levels are responsible for ensuring that safeguarding responsibilities are understood and implemented within their areas of responsibility, and that staff receive appropriate support, supervision and safeguarding training.

All staff share responsibility for safeguarding and promoting the welfare of children and adults at risk. Staff are required to understand and follow this policy, the Staff Code of Conduct and associated safeguarding procedures, and to act promptly when concerns arise.

The effectiveness of safeguarding arrangements, safeguarding training compliance, safeguarding records, safer recruitment processes, online safety controls and filtering and monitoring arrangements will be reviewed regularly by the DSL and Senior Leadership Team. Findings, actions and improvements will be reported to the Chief Executive Officer and, where appropriate, the Board.

All staff are required to maintain an up-to-date understanding of statutory safeguarding guidance, organisational safeguarding procedures and their individual safeguarding responsibilities. Staff are expected to demonstrate professional curiosity, respectfully questioning and exploring information where something does not appear consistent, in order to identify potential safeguarding concerns at the earliest opportunity.

This policy will be reviewed annually, or sooner where required due to changes in legislation, statutory guidance, safeguarding practice, organisational structure or operational delivery.

For the purposes of this policy, the Senior Leadership Team consists of the Chief Executive Officer, Chief Operating Officer and other designated senior leaders with organisational responsibility for safeguarding, welfare, compliance and operational oversight.

Definitions

Child: A young person under the age of 18.
Adult at risk: An adult aged 18 or 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 is at risk of, abuse, neglect or exploitation; and
(c) as a result of those care and support needs, is unable to protect themselves from the risk or experience of abuse,

neglect or 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 everyone at Nisai Group. We understand our statutory duty to safeguard and promote the welfare of students, and we maintain a professional attitude of "it could happen here" in all safeguarding matters. We expect all staff to share this commitment by 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 students and capture their voice so that we can understand their backgrounds, experiences, behaviours, barriers and feedback from staff. The best interests of students are at the heart of all Nisai systems, processes and policies.

We recognise that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected. They may not recognise their experiences as harmful, or they may feel embarrassed, humiliated or threatened. This may be linked to vulnerability, disability, sexual orientation or language barriers. This does not prevent staff from using professional curiosity and speaking to the Safeguarding Team if they have concerns about a student. Staff should consider how best to build trusted relationships that support safe communication.

Staff must act without delay where they identify any safeguarding concern. Concerns should never be dismissed as insignificant. A single incident may require immediate escalation, while a series of lower-level concerns may together indicate a pattern of harm. All concerns must therefore be reported promptly to the Safeguarding Team so that appropriate action can be taken.

In line with KCSIE 2026 and Working Together to Safeguard Children 2026, we support early identification, timely information sharing, community-based early help assessment, Family Help and statutory children's social care processes where these are led by the customer, local authority or safeguarding partners. For the purposes of this policy, Family Help refers to the integrated support pathway described in Working Together 2026, combining targeted early help and section 17 support where this is locally implemented.

As our academic provision is delivered online, staff must remain professionally curious about digital indicators of concern. These may include unexplained non-attendance from live lessons, sudden withdrawal from online communication, concerning comments in chat, visible or audible signs of distress, inappropriate use of messaging tools, disclosure through private message or email, repeated technical barriers that may mask non-engagement, or concerns about who may be present in the student's learning environment.

We work collaboratively with customers and safeguarding partners, sharing a common commitment to safeguarding, learning from one another, valuing different perspectives and providing constructive challenge where this supports better outcomes for students.

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. Staff are supported

through opportunities to discuss anxieties with the DSL and to access further support where appropriate. Safeguarding supervision meetings take place regularly within the safeguarding team. Nisai also provides an Employee Assistance Programme for all staff, including access to counselling where needed. External organisations such as the Education Support Helpline can also provide free and confidential emotional support for teachers and education staff.

We will build effective links with customers and relevant agencies such as social workers/lead practitioners. We will co-operate with safeguarding enquiries, attendance concerns, written reports, initial case conferences, core groups and child protection review conferences where required. We will also maintain an understanding of local safeguarding arrangements and aim to follow local procedures when contacting key personnel.

Family Help and Early Intervention

Nisai recognises that providing help and support at the earliest opportunity can improve outcomes for children, young people and families. Early identification of emerging needs is a key part of safeguarding practice and can help prevent concerns from escalating.

Where staff identify concerns about a child's welfare, wellbeing, behaviour, attendance, engagement, emotional health or wider circumstances, these must be discussed with the Safeguarding Team. The Safeguarding Team will consider whether Family Help, early intervention or additional support may be appropriate.

As an online education and mentoring provider, Nisai may identify emerging concerns through attendance patterns, engagement levels, live lessons, mentoring sessions, home visits, communications, wellbeing discussions, changes in presentation, family circumstances or disclosures. Mentors may develop trusted relationships with students and therefore can play an important role in identifying emerging welfare, wellbeing and safeguarding concerns. All concerns, regardless of perceived severity, must be shared with the Safeguarding Team without delay.

Where mentoring forms part of a student's provision, mentors should remain professionally curious and alert to signs that a student or family may benefit from Family Help, early intervention or additional support. Concerns relating to welfare, attendance, emotional wellbeing, family circumstances, neglect, domestic abuse, exploitation or other vulnerabilities should be discussed with the Safeguarding Team promptly so that appropriate support, assessment and safeguarding action can be considered.

Nisai recognises that any member of staff may be the first person to identify that a child or family may benefit from additional help or support. Staff should therefore raise concerns without delay so that needs can be assessed and appropriate intervention considered.

Nisai Staff with Specific Safeguarding Responsibilities

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

The Safeguarding Team receives appropriate safeguarding training so that team members understand their roles and have the knowledge and skills to carry them out effectively. Deputy Designated Safeguarding Leads are trained to the same level as the DSL. Training is updated at least every two years, and knowledge is refreshed throughout the year through activities such as DSL meetings, e-bulletins, CASPAR updates, local authority networking webinars and wider safeguarding updates. The Safeguarding Team is given the time, funding, training, resources and support needed to carry out its role effectively.

The Chief Operating Officer fulfils the role of Designated Safeguarding Lead and is supported by trained Deputy Designated Safeguarding Leads.

They 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 Safeguarding Team and ensure team members have the time, training and support required to undertake their duties.
- Ensure contingency arrangements are in place if the designated member of staff is unavailable.
- Ensure safeguarding supervision takes place regularly with the Safeguarding Team.
- Ensure all safeguarding concerns and disclosures are reported to the relevant customer safeguarding contacts in accordance with this policy.
- Review safeguarding procedures annually to ensure they remain compliant with legislation, guidance and best practice.
- Ensure all members of the Nisai Group Board receive annual safeguarding training in line with KCSIE guidance.
- Act as a source of support, advice and expertise for staff.

The senior management team will ensure that all employees:

- Know and understand Nisai Group safeguarding procedures.
- Know the names and roles of the designated members of the Safeguarding Team.
- Understand their individual responsibility to escalate concerns through the correct channels and within appropriate timescales.
- Receive appropriate safeguarding training from induction onwards, including formal and refresher training, so that they understand:
  - their personal responsibility;
  - the need to be vigilant in identifying possible abuse, neglect or exploitation; and
  - how to support and respond to a child who discloses abuse.
- Recognise their duty to raise concerns about poor or unsafe practice relating to students, and understand that such concerns will be addressed sensitively, effectively and in a timely manner in accordance with agreed whistleblowing policies.

Safeguarding Team Contact Details – safeguarding@nisai.com / 0208 424 8475

Designated Safeguarding Lead – Victoria Reaney, Chief Operating Officer
Email: victoria.reaney@nisai.com

Deputy DSL – Karina Eldrett
Email: karina.eldrett@nisai.com

During term time, the Safeguarding Team is available via Teams, email or by phone during office hours (8am – 4.30pm) for staff to discuss safeguarding concerns or to carry out escalations. In the absence of the DSL, the DDSLs will lead on safeguarding matters with clear direction and support from the Senior Leadership Team. In non-term time, or outside Nisai operating hours, students and families should contact emergency services where there is an immediate risk of harm, or seek support from their local authority, school, social worker or other appropriate support services.

Our HR Department maintains robust systems to monitor and record safeguarding training for all staff. Update and refresher timescales are recorded clearly within the training record and reminders sent. Training is delivered in line with KCSIE 2026. The DSL ensures all staff receive safeguarding training appropriate to their role, including recognising indicators of concern, responding to disclosures, recording and reporting information accurately, and understanding emerging risks such as online harms, AI-generated intimate imagery, misogyny, harmful sexual behaviour and violence against women and girls. The DSL also ensures that new staff induction systems are robust, monitored and that any non-compliance is shared with the Senior Leadership Team. The DSL is expected to undertake Prevent awareness training, understand local safeguarding arrangements, understand Family Help pathways and support multi-agency working.

Raising Concerns and Escalations

Staff must report any safeguarding concern or disclosure identified through online lessons, mentoring, chat, email, portal activity, attendance data or any other contact to the Safeguarding Team without delay.

As a national online education and mentoring provider, Nisai works with students, schools, local authorities and other commissioning organisations across multiple local authority areas. Nisai's safeguarding policies, procedures and escalation processes are based on national statutory safeguarding requirements to ensure a consistent and robust approach across all provision. Whilst Nisai does not operate separate safeguarding procedures for individual local authorities, we work collaboratively with customers and safeguarding partners and, where appropriate, take account of local safeguarding arrangements, referral pathways and threshold guidance when responding to concerns.

All safeguarding disclosures, concerns and referrals identified by Nisai will be shared with the main customer contact who arranged or commissioned the student's provision, in accordance with agreed safeguarding arrangements. Nisai expects the customer to initiate and manage their own safeguarding processes and statutory responsibilities as appropriate.

However, safeguarding remains everyone's responsibility. Where a child is at immediate risk of harm, where a delay in action could increase risk, or where a situation requires urgent or statutory intervention, Nisai will take direct safeguarding action without delay. This may include contacting children's social care, the police, emergency services or other relevant safeguarding agencies directly. In such circumstances, the commissioning customer will be informed as soon as it is appropriate, safe and practicable to do so.

Where Nisai believes a child remains at risk, or that appropriate action has not been taken, Nisai reserves the right to escalate concerns directly to children's social care, the police or other statutory agencies in order to safeguard the child.

Nisai will maintain a clear written record of all safeguarding concerns, decisions, referrals, actions taken and communications with customers and external agencies.

Record Keeping

DfE guidance states that all concerns, discussions and decisions made, including the reasons for those decisions, should be recorded in writing. For online provision, records may include relevant lesson details, attendance information, chat or message content, email communication, screenshots where appropriate and lawful, platform logs, and details of contact with customers or safeguarding partners. Information must be kept confidential and stored securely, with access limited to appropriate senior staff. It is good practice to keep concerns and referrals in a separate child protection record for each child. Current or live cases are exempt from examination by parents or children unless subject to a court order. Subject Access Requests may be made for records relating to historic or closed issues.

Records should include:

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

Nisai will:

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

The DSL will undertake regular audits of safeguarding records, safeguarding training compliance, referral quality and response times.

Confidentiality and Information Sharing

- Staff must follow confidentiality protocols and ensure that any information shared is necessary, proportionate, relevant, accurate, timely and secure.
- Staff must clearly identify any third-party or hearsay information and ensure there is a lawful basis for sharing it. If staff are in any doubt about confidentiality or information sharing, they must seek advice from the DSL or a member of the Senior Leadership Team.
- The Safeguarding Team will disclose information about a student to other members of staff on a need-to-know basis only.
- All staff must understand their professional responsibility to share information with other agencies where this is necessary to safeguard children.
- Nisai will process and share safeguarding information in accordance with UK GDPR, the Data Protection Act 2018 and relevant safeguarding guidance. Where special category data is processed, Nisai will identify and record an appropriate lawful basis and special category condition. Data protection law does not prevent proportionate information sharing where this is necessary to safeguard a child.

All staff understand that they cannot promise a child that information will be kept secret where safeguarding concerns are raised.

Supporting the Student at Risk

All children should be protected. Nisai Group recognises that some groups of children may be at greater risk of harm than others. The following list is not exhaustive but highlights groups who may require additional vigilance and support:

- Children who need a social worker, including children in need and children subject to child protection arrangements.
- Children who are absent from education.
- Children who are electively home educated (EHE).
- Children requiring mental health support.
- Looked after children (LAC), previously looked after children (PLAC), children living in kinship care arrangements and care leavers.
- Children with special educational needs, disabilities or health needs.
- Children who are lesbian, gay, bisexual 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 who are vulnerable to, at risk of, or involved in child sexual exploitation (CSE) or child criminal exploitation

(CCE).

Children living in kinship care arrangements may experience challenges relating to attachment, trauma, loss, family change or barriers to accessing support. Staff should remain vigilant to any safeguarding, attendance, wellbeing or engagement concerns and report these through the normal safeguarding procedures.

Where Nisai works with looked after children, previously looked after children or children living in kinship care arrangements, the Safeguarding Team will work with the commissioning school, Virtual School Head, local authority and other relevant professionals to support the child's education, welfare and safeguarding needs.

We support these groups by being:

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

At Nisai Group, we know that the cohort of students in our online provision often have complex needs and may be accessing education away from a physical school site. We are aware that online learning can make some indicators of harm less visible, so staff use professional curiosity, attendance information, engagement patterns, communication logs and observations from live sessions to identify concerns. The DfE guidance clarifies that when a school places a student with an alternative provision provider, the school continues to be responsible for the safeguarding of that student, including knowing where the child will be based during school hours.

We recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated or experience self-blame. Nisai may be the only stable, secure and predictable element in the lives of children at risk. However, when learning, their behaviour may be challenging, defiant or withdrawn. We recognise that some children may adopt abusive behaviours, and these concerns must be escalated to referring customers so that appropriate support and intervention can be facilitated.

We recognise that high self-esteem, confidence, supportive relationships and good communication with a trusted adult can help protect children. Nisai Group will therefore:

- Establish and maintain a safe, inclusive and supportive environment where students feel valued and able to access help when needed.
- Ensure students understand how to access support and report concerns through appropriate Nisai channels.
- Include information and guidance within the Nisai Virtual Academy Student Portal, live lesson induction materials, Wellbeing Centre and Student Guide about who to contact for help and how to raise a safeguarding concern online.
- Ensure students have access to, and are able to complete and understand, the E-Safety course provided by Nisai.

Nisai will endeavour to support students through:

- The curriculum encouraging self-esteem and self-motivation.
- The Nisai ethos promotes a positive, supportive and secure environment where students feel valued.
- The behaviour policy supports vulnerable students through a consistent approach that focuses on the behaviour or incident, while maintaining the student’s sense of self-worth. Nisai ensures that students understand that some behaviour is unacceptable, while also knowing that they are valued.
- Nisai liaises with the customer and, when requested, with other agencies that support the student, such as children’s social care, Child and Adolescent Mental Health Services, the Educational Psychology Service, Behaviour Support Services and the Education Welfare Service.
- Nisai is committed to developing productive and supportive relationships with parents and carers where this is in the student’s best interests and with the agreement of the customer.
- Nisai recognises that children living in a home environment where there is domestic abuse, drug misuse or alcohol misuse may be vulnerable and may need support and protection.
- Staff vigilantly monitor students’ welfare, keep clear records and notify the customer as soon as concerns arise or recur.
- Staff recognise that grooming is a significant safeguarding concern. They are aware of the techniques used by perpetrators and report any suspicions to the Safeguarding Team in a professional and confidential manner.
- Allegations of child-on-child abuse are treated swiftly, seriously and decisively.
- Allegations made about staff or senior managers are managed in line with safeguarding procedures, including referral to the Local Authority Designated Officer (LADO) or, in extreme circumstances, the police.
- Staff identify changes in a child’s mental health and take appropriate action, including prompt escalation to the

referring customer.

We hold more than one emergency contact number for each student wherever reasonably possible. This goes beyond the legal minimum and gives a second route to a responsible adult where a student cannot be reached and there is a welfare or safeguarding concern.

Students with Education, Health and Care Plans (EHCPs)

Nisai recognises that students with Education, Health and Care Plans may have additional vulnerabilities, communication needs, health needs, learning needs or barriers to reporting concerns. Staff must not assume that changes in behaviour, attendance, engagement, communication or presentation are solely linked to a student's SEND or health needs. Staff should maintain professional curiosity and consider whether safeguarding concerns may be present.

Where a student has an EHCP, Nisai will work with the commissioning school, local authority, parent/carer and relevant professionals, as appropriate, to understand agreed support arrangements, risk assessments, communication needs and safeguarding considerations. Any safeguarding concern relating to a student with an EHCP must be recorded and escalated through Nisai's safeguarding procedures without delay. Where non-attendance, disengagement, changes in presentation or online behaviour raise concern, this must be shared promptly with the customer so that relevant safeguarding, attendance, SEND and statutory planning arrangements can be considered by the responsible school, local authority or professional body.

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 2026'.

Departmental Managers have undertaken appropriate Safer Recruitment training. At least one member of every interview panel will have completed this training and will understand safer recruitment requirements and interview techniques.

Our safer recruitment and selection procedures include:

- Scrutinising applications.
- Ensuring candidates have the health and physical capacity required for the role.
- Conducting interviews.
- Undertaking appropriate pre-employment checks, including:
    - verification of the candidate's identity using appropriate original documents or secure digital identity checking arrangements;
    - verification of the candidate's right to work in the UK;
    - verification of relevant professional qualifications, including qualified teacher status where required for the role;
    - obtaining and scrutinising at least two appropriate references, including the most recent employer and any employer where the candidate has worked with children, before appointment wherever possible;
    - checking employment history and exploring any gaps, inconsistencies, repeated moves or safeguarding concerns arising from the application, references or interview;
    - considering online checks of shortlisted candidates where these are proportionate and relevant to safeguarding suitability;
    - ensuring candidates complete a self-declaration of criminal record, safeguarding suitability and disqualification information where relevant before interview or appointment;
    - undertaking an enhanced DBS check, including children's barred list information where the role is in regulated activity;
    - conducting a separate barred list check where a person will start in regulated activity before the DBS certificate is available, only where this is legally permitted and risk assessed;
    - carrying out prohibition from teaching checks for teaching roles and other roles where required;
    - carrying out section 128 direction checks for management, governance or relevant leadership roles where applicable;
    - considering childcare disqualification requirements where these apply to the role or setting;
    - completing overseas criminal record and professional standing checks for candidates who have lived or worked outside the UK, where appropriate; and
    - ensuring that no person begins work with students until all required recruitment, vetting and risk assessment steps have been completed or formally authorised by senior leadership in line with statutory guidance.

Evidence of required pre-employment checks is recorded on the Single Central Record (SCR). The SCR is maintained by HR, checked by senior leaders and made available for external scrutiny where required and with limitations. The SCR records, as applicable, identity checks, barred list checks, enhanced DBS checks, DBS

certificate details, prohibition checks, section 128 checks, right to work checks, qualification checks, references, overseas checks, agency or contractor assurances, start dates, role details and the date each check was completed. All recruitment materials include reference to Nisai's commitment to safeguarding and promoting the welfare of students.

Staff who have lived or worked outside the UK will undergo the same checks as all other staff. Where appropriate, additional overseas checks will be completed, including overseas criminal record checks, certificates of good conduct and confirmation from relevant professional regulatory bodies that there are no sanctions, restrictions, or reasons why the individual may be unsuitable to teach or work with children. Where overseas checks cannot reasonably be obtained, Nisai will complete and record a proportionate risk assessment and seek additional evidence of suitability before appointment.

Nisai Group does not routinely utilise volunteers within its educational, mentoring, safeguarding or operational provision. Where this position changes, any volunteer role will be assessed before appointment to determine whether it involves regulated activity, and the appropriate checks will be completed in line with statutory guidance. All individuals who work directly or indirectly with students are engaged through formal employment or approved contractual arrangements and are subject to the recruitment, safeguarding and suitability checks relevant to their role.

For agency staff, contractors, consultants and other adults supplied by a third party, Nisai will obtain written confirmation that the required safer recruitment, identity, right to work, DBS, barred list, prohibition, overseas and suitability checks have been completed where relevant. Nisai will also verify the identity of any such person on arrival or before access to students or student systems is granted. Where a person is self-employed or engaged directly by Nisai, Nisai will complete the relevant checks itself.

Where a role involves regulated activity, Nisai will ensure that the person is not barred from working with children before they are permitted to undertake that activity. Regulated activity includes, where the statutory criteria are met, teaching, training, instructing, caring for or supervising children, providing advice or guidance to children, or driving a vehicle only for children. Decisions about whether a role is regulated activity will be recorded and reviewed where duties change.

The Safer Recruitment Policy and Single Central Record process will be reviewed against the relevant KCSIE 2026 safer recruitment and regulated activity requirements, including DBS checks, barred list checks, overseas checks, section 128 checks, prohibition checks, agency and contractor checks, supervision arrangements and governance oversight. The SCR will be audited regularly by HR and senior leaders, with periodic assurance reported to the Board. Any changes required by law or statutory guidance will be implemented before the policy takes effect.

Induction

All staff will be made aware of the systems and procedures we have in place to support safeguarding as part of their induction. This includes:

- The Safeguarding policy
- The Behaviour policy
- The staff code of conduct policy
- The role of the Safeguarding Team (including the identity of the DSL and any deputies).
- Part One of Keeping Children Safe in Education 2026.

Managing Allegations against Staff

Nisai promotes an open and transparent culture in which concerns about adults are identified, reported and managed promptly and appropriately. This enables us to identify inappropriate, problematic or concerning behaviour at an early stage, reducing the risk of harm and ensuring all staff understand and maintain professional boundaries.

We recognise that allegations against staff may arise in circumstances beyond those where there is reasonable cause to believe a child has suffered, or is at risk of suffering, significant harm. Some allegations may indicate that a staff member is unsuitable to work with children.

In line with Working Together to Safeguard Children 2026, an allegation may arise where an adult has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved towards a child or children in a way that indicates that they are unsuitable to work with children

Examples of Inappropriate Behaviour

Physical Abuse

For example, the intentional use of force as punishment, slapping, hitting with objects, throwing objects, or rough physical handling.

Emotional Abuse

For example, intimidation, belittling, scapegoating, sarcasm, a lack of respect for children's rights, or discriminatory attitudes based on race, gender, disability or sexuality.

Sexual Abuse

For example, sexualised behaviour towards students, sexual harassment, inappropriate messages, inappropriate images shared via social media, sexual assault or rape. Staff are aware that sexual relationships with students are unlawful and may result in criminal proceedings under the Sexual Offences Act 2003.

Neglect

For example, failing to take action to protect a child, failing to seek medical attention where required, or failing to undertake an appropriate risk assessment.

Spiritual Abuse

For example, exerting undue influence or pressure to ensure obedience, or enforcing harmful religious practices.

If an allegation is made, a low-level concern is raised, or information is received about an adult working for Nisai, either from within the workplace or from external sources including transferable risk, that indicates they may be unsuitable to work with children, the member of staff receiving the information must report it immediately. Allegations or concerns that may meet the harm threshold must be reported to the Chief Operating Officer (COO) without delay.

Low-level concerns that do not appear to meet the harm threshold must be reported through the Low-Level Concern process to the COO and/or DSL as set out in the Staff Code of Conduct. Where there is any doubt about whether the harm threshold is met, the COO or DSL will seek LADO advice. Where the allegation or concern relates to the COO or the DSL, it must be reported directly to the CEO, who will contact the LADO.

The COO will exercise professional judgement and remain accountable for decisions related to the management of allegations and concerns 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 student, 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 record.

If the allegation concerns the CEO, a Board member, the DSL, the COO, a senior leader, or any person who could influence internal decision-making, it must be reported directly to the LADO and/or an appropriate independent Board representative to ensure impartiality and independence. LADO advice will be sought within one working day where the harm threshold may be met. No member of staff or senior leader will begin an internal investigation before LADO advice has been received, unless immediate action is required to protect a child from harm.

Allegations relating to a former staff member, 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.

If a customer has a concern about a member of Nisai staff, they should immediately contact **safeguarding@nisai.com** or call **0208 424 8475** and ask to speak to the DSL or Chief Operating Officer.

Nisai has a legal duty to refer an individual to the Disclosure and Barring Service (DBS) if they have harmed a child, pose a risk of harm to a child, or there is reason to believe they have committed a relevant offence, and they have been removed from regulated activity (paid or unpaid), or would have been removed had they not left the organisation. The DBS will determine whether the individual should be barred. Where these circumstances arise, Nisai will make a referral as soon as possible once the referral criteria are met, in line with advice from the LADO and/or HR. The DSL is responsible for ensuring that any DBS referral is made. All actions must comply with UK GDPR requirements.

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.

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, sexual harassment, harmful sexual behaviour, sharing nudes and semi-nudes, self-generated intimate images and upskirting
- Children and the court system (5-11yrs & 12-17yrs)
- 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 **(**see the Mental Health section of this policy and, in full, the Student Mental Health Policy)
- Online safety
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Trafficking

All staff maintain an up-to-date understanding of statutory safeguarding guidance, including Keeping Children Safe in Education 2026, and understand how safeguarding relates to their daily practice**.**

All staff complete safeguarding and child protection training appropriate to their role and receive regular safeguarding updates throughout their employment.

All staff know who the Safeguarding Team are and understand that as well as being the experts 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 and thrive.

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.

Our mentors must not enter a home unless a nominated and approved adult is present**.** Should circumstances change whilst a visit takes place, mentors know they need to leave the home.

Risk assessments are created for home visits and external locations for students who are part of our mentoring provision.

All staff recognise that technology is a significant part of many safeguarding and wellbeing issues. Children may be at risk online, face to face, or both. Online child-on-child abuse can include abusive, harassing, misogynistic or misandrist messages; non-consensual sharing of indecent or self-generated intimate images; AI-generated intimate images and deepfakes; use of chat groups to share abusive content; and sharing pornography or abusive images with those who do not want to receive them. This includes AI-generated child sexual abuse material. https://www.iwf.org.uk/media/ceel0u4z/ai-guidance-england-final.pdf

All staff must also be alert to disinformation, misinformation, conspiracy theories, misogynistic content, harmful gender stereotypes and online influencers who promote abuse, harassment or exploitation. Staff must challenge prejudicial, sexually harmful, abusive or discriminatory language and behaviour and escalate concerns to the Safeguarding Team.

All staff are aware of how to respond to and support a student who discloses abuse. It is vital that our actions do not

abuse the child further or prejudice further enquiries, for example:

- Recognise that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person receiving the disclosure recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- Stay calm, listen to the child and if you are shocked by what is being said try not to show it.
- Do not promise confidentiality; you can however promise privacy; reassure the child they have done the right thing. Explain who you will have to tell and why.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- If a child is making a disclosure the pace should be dictated by the child. Listen carefully to the child, reflect back, use the child's language, be non-judgmental, be clear about boundaries and how the report will be progressed, do not ask leading questions and only prompt the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Accept what they are telling you; do not make judgements.
- Reassure the child that they have done the right thing in telling you. Do acknowledge how hard it was for them to tell you.
- Do not criticise the perpetrator; this may be someone they love.
- Tell them what you will do next and with whom the information will be shared.
- Pass this information on immediately to the Safeguarding Team.

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 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, they are not thriving or they may be at risk of harm.

What is a low-level concern?

A low-level concern is a safeguarding framework used in schools and organisations working with children to record, review, and address behaviour by adults that is inappropriate or inconsistent with professional standards but does not meet the threshold of significant harm.

A low-level concern 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.

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.

Our low-level concern policy advises and reminds staff of what constitutes a low-level concern and how to report and escalate those concerns. Additionally, we ensure that these low-level concerns are included as part of our staff

code of conduct, departmental charters and safeguarding policies.

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 harm threshold, we will consult with the LADO.

Definitions and Indicators of Abuse, Neglect and Other Safeguarding Concerns

These definitions are from 'Working Together' (2026) and 'Keeping Children Safe in Education' (2026):

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused within their family, in an institutional setting, or within the wider community by people known to them or, more rarely, by strangers. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children; children can also abuse their peers 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. Children may also cause harm to parents, carers, or other family members. This may be referred to as child-to-parent or child-to-carer abuse.

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 of maternal substance misuse. 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 persistent lateness.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to attend medical appointments.
- Failure to achieve developmental milestones, such as expected growth or weight gain.
- Failure to develop intellectually or socially.
- Responsibility for activities that are 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.
- Evidence of adolescent neglect.
- Evidence of affluent neglect, where a child's needs are unmet despite financial resources.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, 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 physical activity
- 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. Sexual abuse perpetrated by one child against another is a recognised safeguarding concern and must be taken seriously.

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 and 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 that causes severe and persistent adverse effects on their 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 ridiculing 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment 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 themself 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.
- Eating disorders, including anorexia nervosa and bulimia
- Soiling, smearing faeces, enuresis.

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

Parental response

Research and professional practice indicate that the following parental behaviours may be indicators of concern across all categories of abuse and neglect:

- 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 requesting the removal of the child from home
- Violence between adults in the household.
- Evidence of coercion and control.

Disabled Children

When working with disabled children, practitioners should be aware that additional indicators of abuse and neglect may include:

- A bruise in an area that may not cause concern on a mobile child, such as the shin, may be a cause for 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 or removing 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
- Inappropriate invasive procedures.

Adult Safeguarding

In addition to the safeguarding concerns outlined elsewhere in this policy, abuse of adults may include, but is not limited to the following categories:

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

Financial or material abuse - theft, fraud, extortion, misuse or theft of a person's money, benefits, property, or possessions.

Neglect and acts of omission - may include the deliberate withholding of, or failure to provide, appropriate care, support, or access to services.

Discriminatory abuse - harassment, discrimination, or unfair treatment based on a person's disability, age, race, religion, sex, gender identity, or sexual orientation.

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 - Self-neglect may include a failure to care for personal hygiene, health, or living conditions. Indicators may include poor self-care, inadequate nutrition, social isolation, unsafe living conditions, and failure to take prescribed 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. Behaviours such as substance misuse, persistent absence from education, involvement in serious violence (including county lines), radicalisation, and the consensual or non-consensual sharing of nude or semi-nude images and/or videos may indicate that a child is at risk of harm.

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 online harassment, intimidation, and abuse through digital platforms)

Child-on-Child Abuse, including Violence and Harassment

Child-on-child abuse can occur online or face to face, between children of any age and sex, and may involve one child or a group of children.

It can be distressing for victims and may affect their wellbeing, safety and education. It can also exist on a continuum, overlap with other forms of abuse, and occur both online and offline. It is never acceptable.

All Nisai staff must challenge any form of derogatory and sexualised language or behaviour. Staff should remain vigilant to incidents of sexualised or aggressive touching, grabbing, or harassment, particularly where patterns of behaviour may indicate abuse

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 understand that failing to challenge inappropriate behaviours can contribute to an unsafe culture in which abuse becomes normalised and underreported.

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 groups that may be at greater risk, including girls, children with SEND and children who are lesbian, gay, bisexual or questioning their gender. 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.
- consensual and non-consensual sharing of nudes and semi-nudes and/or self-generated intimate images. 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 where it involves children under 18; non-consensual sharing 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. Where a student discloses non-recent abuse, Nisai will support them in reporting the matter to the police where appropriate and will follow safeguarding procedures in consultation with the relevant agencies. Non-recent allegations made by a child will be escalated to the relevant customer so that they can report to the LADO in line with local authority procedures for dealing with non-recent allegations. The LADO will coordinate with local authority children's social care and the police.

Children Who Are Absent from Education

Repeated or prolonged absence from education may be an indicator of abuse, neglect, exploitation, poor mental health, or other safeguarding concerns. 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 children who are persistently or repeatedly absent from education is proactive, robust and helps identify possible abuse, neglect or exploitation. Staff use professional curiosity to identify any underlying safeguarding risk and to help prevent further absence or disengagement.

This includes where concerns are first emerging and where children are already known to local authority children's social care and need a social worker, such as a child in need, a child subject to child protection arrangements, or a looked after child. Absence 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 directly to the referring customer. Nisai customers and parents/carers have access to our portals and can see live attendance data, engagement information and lesson participation where available.

Customers can nominate contacts who will receive an automated non-attendance alert when students who have not been pre-authorised do not attend a live scheduled online lesson. Staff will consider attendance, participation, engagement and wider online safeguarding indicators when assessing potential risk. Any unexplained absence, pattern of disengagement or safeguarding concern must be escalated without delay. For mentoring students, customers receive regular reporting which may include absences, inability to visit, engagement concerns or welfare observations.

Where a student is unexpectedly absent, disengages from learning, cannot be contacted, or there are wider welfare concerns arising from attendance, engagement, communication or presentation, Nisai will work with the commissioning customer to establish the student's safety and wellbeing. This may include contacting emergency contacts held on record, sharing information with relevant safeguarding leads, requesting welfare checks through the responsible school or local authority, and making direct contact with statutory agencies where there is reason to believe a child may be at risk of harm. All actions and decisions will be recorded.

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 can be at risk of abuse or exploitation outside their families. Extra-familial harms include, but are not limited to, sexual abuse, harassment, domestic abuse in young people's own relationships, criminal exploitation, serious youth violence, county lines, radicalisation and online abuse. Technology can facilitate these harms, so staff must consider both online and offline risk when reporting concerns.

Nisai staff will ensure that any suspicion or disclosure of events relating to CSE/CCE are reported to the Safeguarding Team who will then report concerns to the relevant customer safeguarding lead and, where necessary, to 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, for example through others sharing videos or images of them on social media. Financially motivated sexual extortion 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.

Child Sexual Abuse Material (CSAM), including Technology-Assisted CSAM

The making, taking, sending or sharing of indecent, sexually explicit images or videos of children (under the age of 18) is a criminal offence. CSAM may be shared via social networking sites and instant messaging apps and services and may include digitally manipulated and AI-generated nudes and semi-nudes. Where a child shares a nude or semi-nude image because of grooming by a perpetrator, the police should be contacted immediately.

Behaviours linked to consensual and non-consensual sharing of nudes and semi-nudes and/or self-generated intimate images can be signs that children are at risk. CSAM may have extremely damaging and long-lasting consequences for the victim.

Where incidents of consensual and non-consensual making and sharing of nude and semi-nude images are initiated by a child, this may be a demonstration of body confidence, body positivity, or maybe as part of an age-appropriate relationship. We have a responsibility to work with children, their parents and carers in ensuring that all students are fully aware of the risks, dangers and possible repercussions of sharing nude images and videos.

Incidents of consensual and non-consensual making and sharing of nude and semi-nude images can also be a form of child-on-child abuse.

Children and the Court System

All staff should be aware that any child involved in legal proceedings should be made known to the Safeguarding Team. Children may be required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Family court arrangements following separation can also be stressful and may entrench conflict in families. KCSIE 2026 recommends age-appropriate guidance to support young people, including young witness booklets for 5- to 11-year-olds and 12- to 17-year-olds.

Children with family members in prison

Approximately 193,000 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.

Children who are questioning their gender

All staff are aware of the need to take time to understand the thoughts and feelings of children who are questioning their gender and to maintain professional curiosity around the full range of the child's experiences. We also recognise the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Any consideration of social transition should be approached carefully, involving appropriate safeguarding, pastoral, and parental engagement where appropriate. The views of parents/carers should be properly considered except for in rare circumstances where this would constitute a greater risk than not involving them. We will always consider how best to fulfil our statutory safeguarding duty ensuring that any agreed course of action takes account of the impact on all of those affected.

Detailed guidance on children who are questioning their gender is set out in Part two of Keeping Children Safe in Education 2026.

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 indicator of potential involvement in county lines exploitation is repeated episodes of going missing from home, care, or education.

Staff must inform the Safeguarding Team 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.

Cybercrime

Staff should be aware that cybercrime can include unauthorised access to devices, hacking, ransomware, denial-of-service attacks, phishing, online fraud and other technology-enabled offences. Some children may be vulnerable to involvement in cyber-dependent or cyber-enabled crime. Concerns should be reported to the DSL.

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 can also affect young people within their own relationships, as well as within their home and family environments. We will provide appropriate support and signposting for children and young people and will escalate safeguarding concerns to the relevant customer without delay.

Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences may include poor attendance, reduced educational attainment, poor physical and mental health, involvement in criminal activity, and an increased risk of violent crime, criminal exploitation, or sexual exploitation. Nisai will ensure that customers are informed of any safeguarding concerns, disclosures, or reports relating to substance misuse. 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 some 16- and 17-year-olds may be living independently of their parents or legal guardians.

Where concerns about homelessness or the risk of homelessness are identified, the matter will be escalated to the relevant customer so that local safeguarding and support procedures can be initiated.

So-Called Honour-Based Abuse and Faith-Based Abuse

So-called honour-based abuse (HBA) and faith-based abuse encompass incidents or crimes committed to protect or defend the perceived honour of the family and/or 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 safeguarding action to take. All forms of HBA are abuse, regardless of motivation, and must be treated and escalated as safeguarding concerns. 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 Safeguarding Team 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

Those most at risk are girls aged approximately 9 to 15 who are entering puberty.

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.

Terms such as “female circumcision” should not be used as an alternative to FGM, as they can minimise the seriousness of the practice. FGM has no medical benefit, is a form of child abuse and can have serious short- and long-term health consequences. FGM is also linked to so-called 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. The World Health Organisation has been highly critical of the practice, and it was prohibited by the Female Genital Mutilation Act (2003) c.31

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 who discover, either through direct disclosure or visual evidence, that FGM appears to have been carried out on a girl under 18 must make a personal report to the police in accordance with the mandatory reporting duty. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy). 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.

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 contact the police via 101 unless there is an immediate risk of harm, in which case 999 should be used.

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 or concern relating to forced marriage must be treated as a safeguarding emergency and may represent a critical opportunity to protect a child or vulnerable adult from harm. 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 fmu@fcdo.gov.uk

Mental Health

Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide and eating disorders. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff have an important role to play in supporting the mental health and wellbeing of our students including identifying and spotting potential warning signs such as:

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

We have clear systems and processes in place for identifying possible mental health problems, including:

- Staff following the correct Safeguarding escalation process for all concerns relating to mental health & wellbeing
- Offering wellbeing support with signposting to professional agencies such as:
    - Childline (0800 1111),
    - Papyrus HOPELINE247 (0800 068 4141)
    - Shout (text SHOUT to 85258),
    - NHS 111 selecting the mental health option,
    - Recommending they speak to their GP, local CAMHS and other appropriate support services
- where child needs help urgently but it is not an emergency, use NHS 111 online or call 111 and select the mental health option.
- Where a child is in danger, call 999 or arrange for them to be taken to A&E immediately by a parent, carer or other suitable person;
- Where a concern is managed internally, the DSL should also consider whether to inform parents or carers, provided doing so would not place the child at additional risk, and record the decision.

Online Safety, including Filtering and Monitoring

Nisai provides all education online and also delivers one-to-one mentoring which may take place face to face, including in a student's home. Students access online provision through a computer, laptop or tablet and an internet connection. Nisai does not routinely provide devices to students and may be provided by the student's school, local authority, family or other commissioning customer. Where students use personal or customer-provided devices, responsibility for home broadband, device-level security, parental controls and local supervision sits with the customer and/or parent/carer, while Nisai remains responsible for the safeguarding controls within its own online systems and provision.

Customers and parents/carers should ensure that students have suitable device security, age-appropriate parental

controls, internet filtering where available, antivirus protection and a suitable learning environment. Where a student leases a laptop from Nisai, the device is secured and managed by Nisai, with filtering and monitoring controls applied so that attempts to access inappropriate or illegal content can be identified and escalated.

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. Nisai can restrict access to specific 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, security and visibility are controlled. Teachers are responsible for the functionality and interactivity of the lesson and control student permissions. Lessons are conducted using audio, visual aids and written communication tools. Webcams may be used by staff at the beginning and end of lessons to support rapport and identification of the adult leading the session; students do not use webcams unless this has been specifically agreed through an authorised safeguarding or learning support process. Public text chat can be cleared if inappropriate content is posted. Students may privately message the teacher, and all logs are stored securely on Nisai systems.
Staff must maintain professional boundaries in all online interactions. Staff must use approved Nisai systems for teaching, mentoring and communication, must not use personal accounts or private social media to contact students, and must report any inappropriate online contact, attempted contact outside approved systems, or concern about another adult's digital conduct to the DSL or COO as appropriate.

Staff and students must follow the Staff Code of Conduct, Behaviour Policy and online delivery rules when using technology for Nisai provision. This includes using approved systems, avoiding private messaging outside authorised platforms, not using personal social media or personal accounts to contact students, and escalating concerns about personal devices, mobile phones or online conduct where these may affect student safety.

Staff must not use personal mobile phones, personal email accounts, personal messaging applications or personal devices to communicate with students unless this forms part of an exceptional safeguarding arrangement authorised in writing by the DSL or Senior Leadership Team. All communication with students must take place through approved Nisai systems so that appropriate safeguarding, monitoring and record-keeping arrangements can be maintained.

Where staff observe or suspect that a student is not in a safe or appropriate location for learning, that another person is influencing or supervising the student in a concerning way, or that the student may be unable to participate privately or safely, this must be recorded and escalated to the Safeguarding Team.

Staff should remain alert to safeguarding concerns arising through online interactions between students. This may include bullying, cyberbullying, coercive behaviour, exploitation, grooming, sexual harassment, harmful sexual behaviour, sharing of nudes or semi-nudes, image-based abuse, online relationship abuse, financially motivated sexual extortion and other forms of peer-on-peer harm. Concerns arising from student-to-student interactions, whether on Nisai platforms or elsewhere online, must be reported promptly to the Safeguarding Team.

Nisai has appropriate filtering and monitoring systems in place for its own systems, staff devices and managed devices, and regularly reviews their effectiveness. Filtering and monitoring form part of our wider safeguarding and online safety arrangements. Roles, responsibilities, review processes and escalation routes are clearly identified. The Senior Leadership Team member responsible for filtering and monitoring, supported by the DSL and IT support, will ensure that filtering and monitoring effectiveness is reviewed at least once every academic year, that review outcomes and actions are recorded, and that safeguarding concerns arising from filtering or monitoring information are escalated through safeguarding channels. Reviews will consider illegal, inappropriate, harmful, real-time, dynamic, personalised and AI-generated content. Where students access provision through non-Nisai devices or networks, Nisai will make clear to customers and parents/carers that local device controls, home internet filtering and supervision remain an important part of the safeguarding arrangements.

The Chief Executive Officer retains overall accountability for ensuring appropriate filtering and monitoring arrangements are in place. Operational responsibility is delegated to the Chief Operating Officer, Designated Safeguarding Lead and IT

Team, who oversee the implementation, effectiveness and regular review of filtering and monitoring arrangements, including consideration of incidents, trends and emerging risks.

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.

Staff must notify the Safeguarding Team if they become aware of a private fostering arrangement. The Safeguarding Team will escalate this information to the relevant customer, who has a duty to ensure that the child is appropriately safeguarded and that the arrangement is suitable.

Preventing Radicalisation

Children can be vulnerable to extremist ideology and radicalisation. As with other forms of harm and abuse, protecting children from the risk of radicalisation must form part of a school's or college's 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 calls 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 of expression carries responsibilities. Speech that seeks to manipulate vulnerable individuals, promote hatred, encourage violence, or cause harm to others is inconsistent with the values that underpin a democratic society.

Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Staff should be alert to online misogyny, extremist narratives, conspiracy theories and other harmful content that may increase vulnerability to radicalisation, harassment, violence or exploitation.

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).

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 the following indicators may be associated with radicalisation, they should not be viewed in isolation. Staff should apply professional judgement and discuss any concerns with the DSL:

- 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

Nisai recognises its important role in protecting and safeguarding the wellbeing of students who may be vulnerable to radicalisation, exploitation, or involvement in criminal activity. Nisai will continue to empower its students to create communities that are resilient to extremism and protect the wellbeing of students who may be vulnerable to being drawn into violent extremism or crime. Nisai promotes safe and respectful opportunities for discussion and debate, where shared values such as tolerance, respect and inclusion 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.

Where concerns relating to radicalisation are identified, Nisai will escalate these concerns to the relevant customer and provide any information required to support consideration of 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. The DSL, deputy DSLs and relevant senior leaders maintain an up-to-date understanding of the Prevent Duty Guidance for England and Wales. All Nisai staff complete mandatory annual Prevent training. Students also have access to information and support through the Nisai Wellbeing Centre.

Sharing Nudes and Semi-Nudes, including Self-Generated Intimate Images

This section relates to consensual and non-consensual self-generated intimate images and/or videos, including nude and semi-nude images, digitally manipulated images and AI-generated images or videos such as deepfakes, involving children under the age of 18. This may occur via social networking sites, online platforms, instant messaging apps or services.

Behaviours linked to consensual and non-consensual self-generated intimate images and/or videos, including AI-generated images, can be signs that children are at risk. Non-consensual sharing, coercion, blackmail, threats, financially motivated sexual extortion and image-based abuse must be escalated as safeguarding concerns.

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 because of grooming by a perpetrator, and that some incidents are initiated by the child, as a demonstration of body confidence, body positivity, or as part of an age-appropriate relationship. Nisai has a responsibility to work with children, their parents and carers in ensuring that all students are fully aware of the risks, dangers and possible repercussions of sharing nude images and videos.

If a student discloses an incident of this nature to a member of staff, the information must be reported to the DSL immediately and escalated to the relevant customer without delay.

Staff **must not view, copy, forward, save or share the imagery** unless specifically directed by the police or another appropriate authority. 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. The term "sexting" may appear in external guidance, but Nisai will use "sharing nudes and semi-nudes" or "self-generated intimate images" in policy and practice wherever possible.

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, regardless of gender, can be a victim. Where this occurs between children, it should be treated as a form of child-on-child abuse and harmful sexual behaviour (HSB).

In the event of a student disclosing an event of this nature, the DSL must report the concern to the relevant customer and follow safeguarding procedures without delay.

Signs and Indicators of Abuse, Neglect or Exploitation in Adults

An adult may disclose abuse directly to a member of staff, or concerns may arise through observation of behaviour, presentation, attendance, or information provided by others. 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.
- Significant weight loss or gain, poor personal hygiene, or an unkempt appearance.
- A change in the behaviour or confidence of a person.
- Self-harm.
- Fear of, or reluctance to engage with, a particular individual or group.
- A family member, carer, or other individual consistently speaks on behalf of the person and limits their ability to make independent decisions.

Other Nisai-Related Policies

The following policies, procedures and risk assessments should be read alongside this policy and form part of Nisai Group's wider safeguarding framework:

Safeguarding and Welfare

- Low-Level Concerns Policy
- Staff Code of Conduct
- Whistleblowing Policy (HR10)
- Mental Health Policy (Students)
- Mental Health Policy (Staff)
- Lone Working Policy
- Home Visit Policy
- Attendance Policy (IM19)
- Behaviour Policy (CM12)
- Anti-Bullying Policy (CM14)
- Equality, Diversity and Inclusion Policy (CM5)

Recruitment and Workforce

- Safer Recruitment Policy (HRM3)

Information Governance and Digital Safety

- Data Protection Policy
- Nisai AI Policy
- NVA Online Delivery Risk Assessment

Corporate Governance

- Complaints Policy (SM4)

National Guidance and Resources

This policy has been developed with regard to the following legislation, statutory guidance, departmental advice and safeguarding resources:

Statutory Guidance

Department for Education (DfE)

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026

- Working Together to Improve School Attendance
- Alternative Provision Statutory Guidance
- Education for Children with Health Needs Who Cannot Attend School
- Behaviour in Schools
- Mental Health and Behaviour in Schools
- Relationships Education, Relationships and Sex Education (RSE) and Health Education
- Safeguarding and Remote Education
- Safeguarding Practitioners: Information Sharing Advice
- School Suspensions and Permanent Exclusions

Prevent Duty

- Prevent Duty Guidance: England and Wales
- The Prevent Duty: Safeguarding Learners Vulnerable to Radicalisation
- Educate Against Hate

Online Safety and Digital Safeguarding

Department for Education

- Meeting Digital and Technology Standards in Schools and Colleges
- Plan Technology for Your School

UK Council for Internet Safety (UKCIS)

- Education for a Connected World
- Using External Expertise to Enhance Online Safety Education

Specialist Online Safety Organisations

- Child Exploitation and Online Protection Command (CEOP)
- Internet Watch Foundation (IWF)
- UK Safer Internet Centre
- Professionals Online Safety Helpline
- Childnet Cyberbullying Guidance

Safeguarding Practice Guidance

Department for Education and Government

- Preventing and Tackling Bullying
- Positive Environments Where Children Can Flourish
- Ofsted Safeguarding Concerns: Guidance for Inspectors
- Ofsted Inspection Frameworks and Handbooks
- Criminal Exploitation of Children and Vulnerable Adults: County Lines
- Preventing Youth Violence and Gang Involvement
- When to Call the Police: Guidance for Schools and Colleges

NSPCC Resources

- Responding to Children Who Display Sexualised Behaviour
- NSPCC Learning and Safeguarding Resources
- Whistleblowing Advice and Support

Mental Health and Wellbeing

Government and NHS Resources

- Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges
- Promoting Children and Young People's Mental Health and Wellbeing
- NHS 111 Mental Health Service

Clinical and Specialist Guidance

- NICE Guideline NG225: Self-Harm Assessment, Management and Preventing Recurrence

Support Organisations

- Childline
- Papyrus HOPELINE247
- Shout
- Samaritans
- Mind
- The Mix

Specialist Safeguarding Support Organisations

- NSPCC
- Women's Aid
- Barnardo's RU Safe? Service
- Crimestoppers
- Kidscape

Current versions of all statutory guidance and associated resources are available through GOV.UK, the Department for Education, NSPCC, UKCIS, Ofsted and other relevant agencies.

Safeguarding Commitment

Nisai Group is committed to maintaining a culture where safeguarding is everyone's responsibility and the welfare of students remains paramount. We expect all staff, contractors and third parties working on behalf of Nisai to uphold the principles and requirements set out within this policy, to maintain professional curiosity, and to take prompt and appropriate action where concerns arise.

Through effective leadership, robust safeguarding arrangements, ongoing training and a student-centred approach, we will continue to provide a safe, inclusive and supportive learning environment in which students can learn, develop and thrive.

Policy Owner: Chief Operating Officer / Designated Safeguarding Lead
Review Frequency: Annually, or sooner where required by changes in legislation, statutory guidance, safeguarding practice, organisational structure or operational delivery.
Next Scheduled Review Date: September 2027