

# NUDGE EDUCATION

Child Protection and Safeguarding Policy (Incorporating Prevent Duty)

September 2023

Status; Statutory

To be Reviewed Sept 2024

## Scope of Document

Nudge Education exists to eradicate chronic disengagement from Education and as such, we are often commissioned to work with some very vulnerable students and young people. Our Child Protection and Safeguarding Policy has been drafted and approved by the Directorate of Nudge Education to ensure our staff, associates, students and commissioners are fully aware to our commitment to Safeguarding under relevant legislation and guidance listed within this policy document.

## Main Updates for 2023::

1. Update of filtering and monitoring guidance for staff and students in section 14 (online safety)
2. Update of Safeguarding Reporting Process to clarify de-escalation of concerns.
3. Inclusion of recruitment considerations (Section 20) in relation to safeguarding.

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Statement of Intent;

This policy was drafted to ensure the principles of the following legislation and guidance are intrinsic to our ethos and practice;

[Children Act 1989](#)

[Children Act 2004](#)

[Working together to Safeguard Children 2018](#)

[Framework for the Assessment of Children in Need and their Families' 2000 \(Department of Health\)](#)

['What to do if you're worried a child is being abused' Advice for Practitioners 2015 \(Department for Education\)](#)

[Keeping Children Safe in Education 2023](#)

(Herein referred to as KSCIE 2023)

[Equality Act 2010](#)

[Education Act 2002](#)

[Special Educational Needs Code of Practice 2015](#)

This policy aims to;

- Support the student's development in a method that will foster security, confidence and independence.
- Provide an environment in which students feel safe, secure, and respected, with the confidence to approach adults appropriately and ensure that their concerns are listened to.
- Highlight to all staff of Nudge Education and their associates of the need to safeguard children, including their responsibilities in identifying and reporting suspicions of abuse
- Document the methods of monitoring students thought to be at risk of harm and set in place suitable support systems.
- Highlight the need for clear lines of communication at all levels of the organisation
- Develop and maintain effective working relationships with other agencies and organisations in relation to the safeguarding of students i.e. police and local authorities.
- Ensure that all staff working for Nudge Education who come into contact with students and other vulnerable groups have been checked for their suitability to their role including Disclosure and Barring Scheme (DBS) Checks and relevant training (specific to role), with a central record being kept for audit purposes and to make reports to authorities if those who are barred from working with young people or apply to work with us.

## Monitoring and Evaluation

Our Child Protection Policy and Procedures will be monitored and evaluated by the Directorate of Nudge Education in coordination with our Advisory Board and the Education and Intervention team. We will use information such as;

1. Minutes of meetings relating to child protection and safeguarding.
2. Surveys and feedback from both students and commissioners
3. Review of records of bullying/racist/sexually inappropriate incidents.
4. Content of appropriate training courses
5. Observational data of education provision
6. Feedback from commissioners and external safeguarding agencies
7. Minutes from advisory board meetings
8. Internal compliance audits
9. External commissioner quality assurance audits

## Communication with Parents/Carers

We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.

We will always undertake appropriate discussion with parents/carers prior to involvement of another agency unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation.

We will ensure that parents have an understanding of the responsibilities placed on Nudge Education and their staff and associates to safeguard children and their duty to co-operate with other agencies in this respect. This will be formally documented in a guide for parents and carers to be given out at the start of an intervention.

This policy has been reviewed and Approved by

Diego Melo: Chief Executive Officer

Brian Mair: Managing Director

Elizabeth Robinson: Service Lead - Nudge Education

September 2023

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Regional DSLs are people in the post of Regional Lead and can be contacted by getting their details through our internal systems for staff and associates. For external stakeholders who need to speak with them, contact **0333 772 9452** and select the relevant safeguarding option.

## 1.Student Considerations

Nudge Education realises that any students who are experiencing abuse, or are witness to abuse may not feel empowered to change their situation and indeed may not even realise that they are being abused.

Nudge Education also understands that students who are in this situation may display a range of behaviours that ranges from aggressive to withdrawn.

The part we play in supporting the student to build their self-worth, confidence and assertiveness as well as challenging negative behaviours such as aggression and bullying. This is done by encouraging a safe and positive environment when working with students and build trusting relationships which facilitate communication.

Nudge Education adheres to the protocol that we will notify the commissioner and relevant safeguarding bodies as soon as there is a significant concern about a student and we will work with all parties to ensure that child protection processes are followed in a confidential manner. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the regional DSL if they have concerns about a child.

Everyone working within Nudge Education will be aware of the definitions and signs and symptoms of abuse. Using the definitions from the guidance document “KSCIE (DfE 2023)” we recognise there are five types of abuse;

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development.

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.

Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

Underpinning all of the above points is our understanding that one of the reasons for a student becoming disengaged from education is an underlying safeguarding concern and our policy, process and practice aims to make sure we address all concerns effectively.

## 2.Early Help

As the nature of our work means we come into contact with a lot of young people who may already have been subject to safeguarding investigations, we are vigilant in looking out for potential indicators of a safeguarding concern. In line with “*Working Together to Safeguard Children*” (2018) we put specific focus on those students who:

- are disabled and have specific additional needs
- have special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- are young carers
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- are frequently missing/goes missing from care or from home
- are at risk of modern slavery, trafficking or exploitation
- are at risk of being radicalised or exploited
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are misusing drugs or alcohol themselves
- have returned home to their family from care
- are a privately fostered child

Nudge Education will also follow official guidance on specific safeguarding matters to ensure all relevant people within or working with the organisation are up to date with recommended practices.

There are a number of sources referenced In Appendix B of KSCIE 2023 that we have used to inform this policy as well as some of the documents in the links below:

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

<https://www.gov.uk/government/publications/children-missing-education>

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

<https://www.gov.uk/domestic-violence-and-abuse>

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

<https://www.gov.uk/forced-marriage>

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<http://educateagainsthate.com/>

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

<https://www.gov.uk/government/publications/children-act-1989-private-fostering>

<https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

We are also ensuring that our case management team and regional leads, to support the National Safeguarding Leads will be undertaking relevant Level 3 safeguarding training as an addition to their level 2 qualifications.

### 3.Commissioner Specific Requirements

As Nudge Education is a national intervention provider, we understand that processes and procedures will vary slightly from one Local Authority to the next so although this document specifically relates to Nudge Education's own Child Protection processes, we will endeavour to:

- Familiarise ourselves with the contact information for the Local Authority Designated Officer (LADO) for each region
- Engage with training and resources from the Local Authority's Safeguarding Partnership (Formerly Local Safeguarding Children Boards)
- Identify a Single Point of Contact (SPoC) within each commissioner to refer day to day concerns to (this may be one person or a referral service such as safeguarding team)
- Undertake relevant audits required for due diligence, such as a [Section 11 audit](#).
- Refer directly to relevant 'front-door' services where this is stipulated in the referral form or communications with commissioner



#### 4. Confidentiality Considerations

Nudge Education understand that all matters relating to child protection are confidential and our Designated/Deputy Safeguarding Lead (D/DSL) will only disclose information about a student to other members of staff on a need to know basis.

Nudge Education informs staff members at induction and regularly updates throughout the year that they have a professional responsibility to share information with relevant agencies to safeguard students who we are commissioned to work with..

All staff are also made aware that a safeguarding disclosure by a student, staff member or associate means that they cannot promise to withhold information from relevant agencies that may compromise a student's safety.

At the point of initial assessment we inform both student and parent/carer of the above considerations as well.

#### 5. Supporting Staff

Nudge Education are aware of the personal attachment that our staff may make with a student and even though they are trained to remain professional at all times, certain instances of abuse or harm to a student may have an impact on their wellbeing. We will work with these staff giving them a confidential environment to talk through their concerns and feelings with the D/DSL. External support in the form of a counsellor or professional supervisor will also be allocated to those who the D/DSL feels it is appropriate for.

All staff who engage with students are highly trained and experienced and will always take care not to place themselves in a vulnerable position with a student that may lead to an allegation of improper behaviour. It is always advised that 1-2-1 work is carried out in a public space or in view of other adults

We understand that a student may make an allegation against a member of staff and that in this instance the following process will be followed;

1. Where there is a history of a student making false allegations, it would be recommended that the intervention is staffed at a 2:1 ratio.
2. If an allegation is made against a member of staff, the person who receives the information will immediately inform the D/DSL.
3. The D/DSL will then discuss the details of the allegation with the relevant Local Authority Designated Officer (LADO) and other safeguarding contacts within our commissioner's organisation.
4. If the allegation refers to the D/DSL then the person receiving the allegation will go straight to the LADO or equivalent, removing the D/DSL out of the communication process.

5. Suspension of a staff member needs careful consideration. Nudge Education will review each case both internally and with the relevant local LADO before a decision is made.

We understand that it will be likely over the course of working on a national basis that a referral to a LADO will occur during the course of our interventions. It is our role to manage these referrals in a timely and appropriate manner.

## 6. Whistleblowing

Nudge Education recognises that students we are commissioned to work with cannot be expected to have full knowledge on the procedures of raising concerns they may have. All our staff need to be aware of their duty to raise concerns where they exist, regarding the child protection and safeguarding process, which may include the action or behaviour of their colleagues or associates. A concern should be raised to Nudge Education's D/DSL in the first instance and, if necessary the LADO for the area they are working in. Information will be on that local authority's website or in Nudge Education's briefing pack for that student.

We will also, upon the advice of the LADO, make the relevant referral to the DBS and Teachers Service (<https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>)

## 7. Physical Intervention

Nudge Education acknowledge that physical intervention with a student should only be used as a last resort when it is judged by our staff member that the student is endangering him/her/themselves or others and that it is the most minimal force necessary that must be applied in that instance.

Every incident of physical intervention must be documented and sent to Nudge Education's D/DSL and signed by both the staff member involved and the D/DSL.

All staff members likely to be involved in the use of physical intervention will be a) already trained in CPI safety Intervention Training, Team Teach technique or other approved methods or b) will receive this training prior to being allocated to a student who has been identified as exhibiting violent or aggressive behaviour.

The concept of 'integrated experience', where the professional's behaviours and attitudes can have an impact on others runs throughout all of our interventions so we can spot early signs of escalation and take appropriate action without the need for physical intervention wherever possible.

Nudge Education acknowledges that physical intervention that results in injury or distress to a student may be considered under the disciplinary procedure if proved after investigation to be excessive force.

Nudge Education acknowledges that touch is appropriate in the context of working with students. All our staff have been given 'Safe Practice' Guidance based upon the Statutory

guidance for schools and colleges; “KSCIE” (DfE 2023) to ensure that professional boundaries are clear.

## 8. Anti-Bullying

Nudge Education adheres to the belief that if bullying is allowed or condoned then this may be considered under child protection procedures. All records of bullying incidents will be logged centrally and passed back to the commissioner for review. Our primary intervention model sees us working with individual students that are disengaged from school however we understand that bullying can still occur both to, and by our students, so we follow a set policy

We take into consideration many legislative guidance documents such as the Equality Act 2010, Preventing and Tackling Bullying: Advice for School Leaders, Staff and Governing Bodies, October 2014 (DoE 2014) and “KSCIE” (DoE 2023).

Nudge Education will involve the parents or primary caregivers to help enforce the value of good behaviour where appropriate. Staff of Nudge Education will receive the required training and information to ensure the anti-bullying policy is upheld throughout the organisation.

Nudge Education will work with outside agencies to support where appropriate to ensure that anti bullying policies and legislation is followed through our programmes of provision.

Nudge Education acknowledges that bullying takes many forms and will update our policies regularly to ensure that they remain current and fit for purposes i.e. updating acceptable use of IT equipment as a measure to control cyber bullying.

## 9. Child-on-child Abuse

The majority of our interventions are individual commissions where we work intensively with one young person to move them towards a permanent setting . As such, the opportunities for peer-on peer abuse when a young person is on one of our interventions is limited but we are fully aware of the need to both prepare young people for transition back into group settings and any concerns that this may raise.

There may also be small numbers of group interventions that we carry out where these principles will apply as well.

At Nudge Education, we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and

well-being. It is also a consideration as part of KCSIE 2023 that all organisations should have a policy regarding child-on-child abuse.

Types of abuse associated with child-on-child abuse:

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken. These could be primary factors behind a young person's disengagement from education so it is critical all people working with our students are aware of them.

#### 9.1 Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

#### 9.2 Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

#### 9.3 Sexting

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

If a student comes to you that has sent or received a photo or video of this nature, follow this process:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.

- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

#### 9.4 Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

#### 9.5 Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

#### 9.6 Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

#### 9.7 Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

#### 9.8 Prevention of child-on-child abuse

Nudge Education recognises that we have a part to play in the prevention of harm to the students we are commissioned to work with and will strive to create an environment where students feel secure and are given an open forum in which to discuss their feelings or anxieties.

Students will also be made aware that there is an appropriate adult within the organisation whom they can approach with these concerns.

Nudge Education will also provide guidance and qualifications where appropriate to ensure emotional and social personal development and to teach students the skills required to stay safe from harm.

This includes safe usage of mobile and communication technologies and the highlighting of associated risks.

## 10. Prevent and Channel Duty

As part of the Counter-Terrorism and Security Act 2015, Nudge Education recognises their responsibilities in keeping students safe from risk of radicalisation and away from exposure to extremist behaviour.

Any acts that are perceived to indicate a student has been 'groomed' or is distributing extremist literature is to be documented and reported to the relevant local LADO and local Prevent Duty authority (details of which will be available from Nudge Education's D/DSL.)

All Staff within Nudge Education are to be trained and given guidance in the Prevent Duty legislative advice.

Channel duty is guidance given by Government to protect vulnerable individuals and groups from becoming radicalised. Section 9 of this guide on safeguarding is particularly useful to our organisation :

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/964567/6.6271\\_HO\\_HMG\\_Channel\\_Duty\\_Guidance\\_v14\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf)

Although we do not meet the criteria in ANnex B of Channel guidance, we operate under the same principles of Working Together to Safeguard Children (2018) from a multi-agency approach and make our commissioners aware of any signs of extremism or radicalisation in our students or their families.

Indicators of potential radicalisation could be:

- Isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

If any students are displaying these behaviours, it should be raised to Nudge Education's DSL or Deputy DSL via the safeguarding concerns form which is on the front page of every intervention pack and also on the staff portal.

This would also be reported on the safeguarding section of the session evaluation that would be sent to the commissioner on a weekly basis. If it felt that the matter required more urgent escalation this would be passed on via phone and email to the commissioner. It would also require a Prevent Referral to be made to the local police. The responsibility for this would be agreed between the commissioner and Nudge Education.

As part of every Nudge intervention, learning around relationships, sex, health and education (RSHE) is embedded and age appropriate for students to promote British values.

## 11. Health & Safety

Nudge Education's Health and Safety Policy is documented in full separately and is focussed on ensuring that our students, staff and associates are kept safe as far as practicable whilst working with us. This covers a range of academic and therapeutic activities as well as undertaking educational trips and visits.

A thorough and robust risk assessment is carried out for each external visit and event taking into consideration each student's individual needs and requirements.

All staff and associates of Nudge Education will be given thorough training prior to beginning a commission which will cover Health and Safety, Child Protection, Safeguarding, First Aid, De-escalation training and positive behaviour support training like CPI safety intervention training when required.

## 12. [Female Genital Mutilation \(FGM\) mandatory reporting duty](#)

FGM comprises 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.

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 (including Nudge Education Experts) along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, 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. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Teachers & Education Experts must personally report to the police cases where they discover that an act of FGM appears to have been carried out. FGM Fact Sheet. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the regional DSL and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of 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, teachers should follow local safeguarding procedures. The following is a useful summary of the [FGM mandatory reporting duty](#):

## 13. 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. 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). Nevertheless, some communities use religion and culture to coerce a person into marriage. Nudge Education can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. Education Experts can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk).

#### 14. Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

An effective approach to online safety empowers Nudge Education to protect and educate the whole organisation in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

#### **Filters and monitoring**

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from various IT systems. As part of this process, the directorate of Nudge Education will ensure there are appropriate filters and monitoring systems in place.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn. Nudge Education will consider the age range of their students, the number of students, how often they access the IT system and the proportionality of costs vs risks.

The UK Safer Internet Centre has published guidance as to what "appropriate" might look like:

• [UK Safer Internet Centre:](#)

Appropriate filtering and monitoring Guidance on e-security is available from the National Education Network-NEN. Buying advice for Education Providers is available [here](#):

#### Use of mobile technology



Many children have unlimited and unrestricted access to the internet and Nudge Education will carefully consider how this is managed whilst working with a commissioned student.

Whilst it is essential that we ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

It is generally suggested, that due to the intensive nature of our delivery models, and the nature of the students we are commissioned to work with, students will not be allowed unsupervised access to ICT or mobile technology whilst on commission with Nudge Education.

Nudge Education works with external partners to review data and information security which incorporates online safety during intervention work. Government guidance around filtering and monitoring provides information for schools and colleges:

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges> .

Where devices are owned and managed by Nudge Education, we ensure that software is updated regularly, age-appropriate filters are in place and also known websites that may look to exploit vulnerable young people to engage in abusive or extremist behaviours are blocked. We are currently looking to embed a wide-ranging digital strategy which will be informed in part by this guidance from the UK Safer Internet Centre:

<https://d1xsi6mgo67kia.cloudfront.net/uploads/2023/05/Appropriate-Monitoring-for-Schools.pdf>

#### Staff training & associate guidance

The government guidance document “[Teaching online safety in schools](#)” (DfE 2020) is to be used and adapted to the style of delivery that Nudge Education employs (i.e, the variety of venues that are used to carry out education interventions should be risk assessed in the same way as a school or college would be.

Nudge Education will ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training (paragraph 64) and the requirement to ensure children are taught about safeguarding, including online (paragraph 68), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. Information and support. There is a wealth of information available to support schools and colleges to keep children safe online. The following is not exhaustive but should provide a useful starting point:

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

[www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)

[www.saferinternet.org.uk](http://www.saferinternet.org.uk)

[www.internetmatters.org](http://www.internetmatters.org)

[www.childnet.com/cyberbullying-guidance](http://www.childnet.com/cyberbullying-guidance)

[www.pshe-association.org.uk](http://www.pshe-association.org.uk)

[www.educateagainsthate.com](http://www.educateagainsthate.com)

[www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation](http://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)  
[Education for a connected world \(UKCCIS 2020\)](#)

## 15. Mental Health. This section has been informed by KSCIE paragraphs 45-46

Staff and associates have a duty of care to be aware of and aim to support with students who may be experiencing mental health concerns. Only those that are trained to do so should attempt to diagnose a specific mental health condition however observation of their day to day behaviours may lead a professional to identify a need for mental health support.

We advise that professionals undertake training in areas such as adverse childhood experiences, mental health in children and adolescents to raise their awareness in such matters. This will be available through Nudge Education's nominated training provider at no charge to staff or associates to facilitate this learning.

If there are any concerns regarding a student's mental health, staff and associates should raise this immediately to their case manager or the nominated safeguarding lead within Nudge Education.

This section is also linked to the anti-bullying section (8) of this policy

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2> is a school-specific guidance document that has some useful information that can be applied in Nudge Education interventions and Public Health England has also produced some materials for their '[Rise Above](#)' initiative that students may find helpful.

## 16. Child Criminal Exploitation (CCE) & Child Sexual Exploitation (CSE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, shoplifting or pickpocketing. 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 indicators of CCE and CSE are below, we recommend that all staff remain alert for these signs and also seek out additional support and training for further clarity from the D/DSL.

- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

- appear with unexplained gifts, money or new possessions; associate with other children involved in exploitation;

Children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections,
- display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

This comes under the banner of contextual safeguarding, i.e. safeguarding concerns that occur outside the home or school. More information is here: <https://contextualsafeguarding.org.uk/>

Advice and guidance around teaching of Relationships, Sex and Health (RSHE) is available here: <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health>

In addition, research has shown that there are additional factors that may increase involvement in serious violence, these are:

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

On a separate note, in line with KCSIE 2023, should a student under our care be required to be interviewed by police, we must ensure that there is an appropriate adult in place throughout the interview. This can be a staff member of Nudge Education, but in the first instance we should contact the commissioner to identify a more suitable advocate such as a parent, carer or social worker

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible> lays out the role a person takes when nominated as the appropriate adult.

This process will also be followed should a student under our care be required to be searched by police.

## 17. Safeguarding of Adults

Although we work primarily with young people under 18, there may be some occasions where you need to work from a student's home where there are vulnerable adults present, or you are requested to work with a young person who is over the age of 18, in which case the safeguarding protocols will differ from the young person's guidance. Each local authority will have their own guidance and reporting protocols. A good example of how to identify safeguarding concerns in adults is located here:

<https://my.northtyneside.gov.uk/sites/default/files/web-page-related-files/Risk%20Threshold%20Tool%20V4.pdf>

## 18. Domestic Violence/Abuse

In line with changes to KCSIE 2023, we know that research shows an increase in reported cases of domestic violence in recent years. The impact and trauma that this causes to a young person can be significant:

*“Domestic abuse...can [be] psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.”*

KCSIE 2023, p.14

In adult safeguarding there are ten types of abuse in comparison to the five under Children's safeguarding protocols. These are:

- Physical
- Sexual
- Psychological/Emotional
- Financial
- Neglect
- Self-Neglect
- Organisational (i.e. care homes)
- Discriminatory
- Modern slavery and,
- Domestic

Any staff member or associate that has direct contact with vulnerable adults via telephone or face to face meetings needs to undertake the “Safeguarding Vulnerable Adults” course via the Educare Portal. It is recommended that all staff and associates should undertake this training to improve their practice and knowledge on the subject.

Your allocated case manager will have the information for the local adult safeguarding partnership in the area you are working in so please contact them for more information.

## 19. LGBTQI+ students

The fact that a child or a young person may be LGBTQI+ is not in itself an inherent risk factor for harm. However, children who are LGBTQI+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQI+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQI+.

Risks can be compounded where children who are LGBTQI+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

All senior team members at Nudge Education have completed training around LGBTQI+ issues and support and further training will be provided for the wider team from September 2023 onwards.

## 20. Recruitment Considerations.

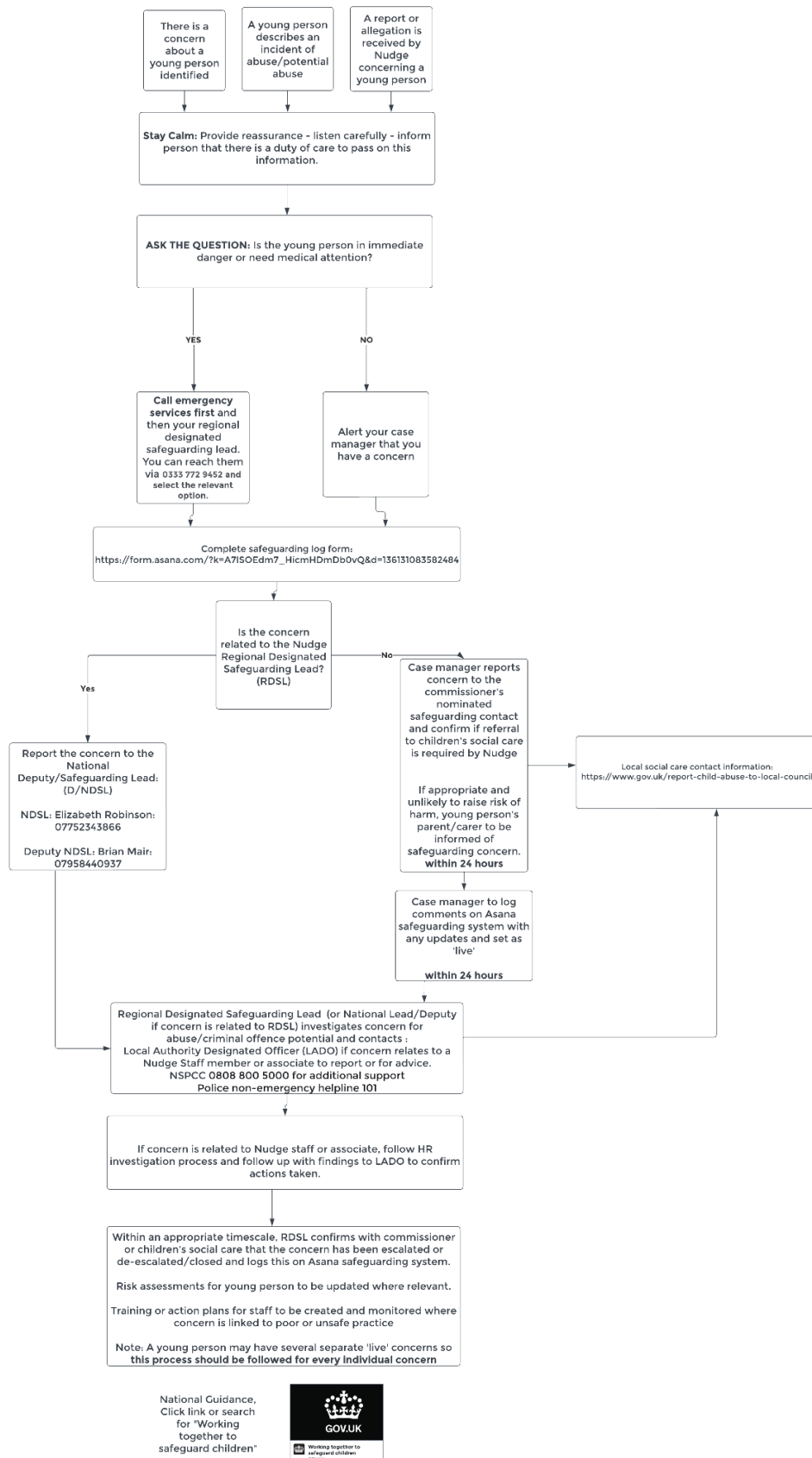
Nudge Education follows a very robust process to ensure that every person working with us to support a young person through a successful transition is skilled, aligned and appropriately trained to work with them. As part of the process, we may undertake additional vetting of a person's social media profiles to ensure that their public persona is one that is appropriate to the role required to support vulnerable young people and their families.

Where we may have concerns that may lead to a safeguarding investigation due to content posted online, this will form part of the disciplinary and safeguarding processes.

END OF POLICY DOCUMENT

Annexes are located on subsequent pages.

## ANNEX A: Safeguarding Flowchart



**IF A YOUNG PERSON CHOOSES TO SPEAK TO YOU DIRECTLY**

**DO**

- Find a quiet place to hold the discussion **NOT behind a closed door where possible**, taking consideration into guidelines about being alone with a young person
  - React calmly so as not to frighten the young person.
  - Take what the person says seriously, recognising the difficulties inherent in interpreting what is being said by a person who has for example a speech impairment and/or differences in language.
  - Avoid asking leading or direct questions other than those seeking to clarify your understanding of what the person has said. They may be subsequently formally interviewed by the Police and/or Social Care Services and they should not have to repeat their account on several occasions. The first person told may become at witness at court if they have asked/gained direct relevant information.
  - Try to reduce any questions you may choose to ask to an **absolute minimum** and concentrate on listening to the person. Questions should never be leading and should only consist of Who ...? Where ...? When ...? What ...?
  - Reassure the young person that they are right to tell and are not to blame.
  - Explain to them that concerns will have to be shared with someone who is able to act. Do not make promises of confidentiality.
  - Make a written record of what has been disclosed at the earliest opportunity.
  - Make a full written record of what has been said, heard and/or seen as soon as possible (preferably on the day that the concern/disclosure was first identified/made) using the incident report template.
  - Discuss the incident report with the Nudge Education Regional Designated Safeguarding Lead (RDSL):
- You can reach them via **0333 772 9452** and select the relevant option.

**OR**

or Elizabeth Walker (07752343866) and (Brian Mair 07958440937) if RDSL is not available,

**DO NOT**

- Dismiss the concern
  - Panic or try to resolve the issue yourself.
  - Allow shock or distaste to show.
  - Probe for more information than is freely offered to open questions.
  - Speculate or make assumptions about what may have happened.
  - Make any comments about the alleged abuser.
  - Make promises or agree to keep secrets.
  - Ask the young person or any witnesses to sign your written information as this may be significantly detrimental to any subsequent police investigation.
  - Take photographs of any alleged injuries. Any such recording must only be done by an approved medical or other practitioner, following referral.
- Discuss the issue with anyone other than your allocated case manager and Lead/Deputy Safeguarding Contact



## ANNEX C: SAFEGUARDING REPORTING PROCEDURE GUIDANCE FOR STAFF

All concerns are taken seriously. Below is an indication of the types of concerns that may appear and the relevant actions to take in each situation. Many of the lower risk concerns may be concurrent or indicative of higher risk concerns so if in doubt, speak to the Regional D/DSL or case manager.

### LOW RISK CONCERNS

To be communicated in weekly report

- Dirty clothes/appearance
- Concerns around cleanliness of home
- Verbal aggression towards Education Expert
- Verbal disclosure of past engagement in risk taking behaviour
- Vandalism - personal and Education Expert's possessions
- Concerns around eating habits
- Concerns around sleeping patterns
- Concerns around lifestyle choices e.g. social choices/personal hygiene/smoking
- Concerns around unhealthy or negative peer relationships

### MEDIUM RISK CONCERNS

To be communicated on the day via email to commissioner and team around the student

- Absence through refusal
- Absence through illness
- Absconding but student was found during session following absconding guidelines
- Concerns around neglect from parent/guardian
- Physical aggression by student towards Education Expert(s)
- Verbal aggression to a member of the public
- MAPA restraint technique used with student
- Verbal disclosure of intent to cause harm or engage in risk taking behaviour
- Vandalism of public property
- Concerns around emotional abuse from parent/guardian
- Parent/guardian preventing student from accessing education

### HIGH RISK CONCERNS

Immediate concerns around immediate safety of student from themselves or family/care team/peers. To be escalated to Commissioner Safeguarding Contact via phone & email as soon as possible. Also inform the regional DSL

*We will action through advice obtained by direct communication with the commissioner via phone and email (and team around the family where appropriate e.g. social workers, parents/carers, CYPS workers).*

Inclusive but NOT exhaustive;

- Concerns around physical/sexual abuse towards student
- Concerns around domestic violence
- Concerning bruising/marks on student
- Suicidal behaviour
- Absconding and student not found within timetabled framework
- Physical aggression by a student towards a member of the public during commissioned hours
- Refusal to go home after session

## WHO DO WE REPORT TO?

STUDENT LIVING WITH PARENT/GUARDIAN	STUDENT LIVING WITH FOSTER CARER	STUDENT LIVING IN CARE HOME
<p><b>LOW:</b> Weekly report email to specified contacts as per individual commission.</p> <p><b>MEDIUM:</b> Same day email to Commissioner.</p> <p><b>HIGH:</b> Phone call to commissioner Follow up with email.. Alert additional services as required - 999 or Emergency social services number.</p>	<p><b>LOW:</b> Weekly report email to specified contacts as per individual commission.</p> <p><b>MEDIUM:</b> Same day email to Commissioner and Social worker.</p> <p><b>HIGH:</b>Phone call to commissioner and social services. Follow up with email. Alert additional services as required - 999 or Emergency services.</p>	<p><b>LOW:</b> Weekly report email to specified contacts as per individual commission.</p> <p><b>MEDIUM:</b> Same day email to Commissioner and Social worker.</p> <p><b>HIGH:</b> Phone call to commissioner and social services. Follow up with email. Alert additional services as required - 999 or Emergency services.</p>

## ANNEX D: Expected action taken from all staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of child-on-child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

- Gather the Facts: gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)
- Consider the Intent (begin to Risk Assess)
- Has this been a deliberate or contrived situation for a young person to be able to harm another?
- Decide on your next course of action

If, from the information that you gather you believe any young person to be at risk of significant harm you must report this to your nominated case manager (or Regional DSL for the region if you cannot get in touch with case manager) who will make a safeguarding referral to the commissioner, and if necessary, Social Services immediately. Where a crime has been committed, the police should be involved also). If this is the case, once the commissioner has been contacted and made a decision on what will happen next then you will be informed on your next steps.

The Regional DSL will review all safeguarding reports

If Social Services and the police intend to pursue this further they may ask to interview the young people in education or they may ask for parents to come to a session to be spoken to also. It is important to be prepared for every situation and the potential time it may take.

Points to consider:

What are the ages of the children involved?

How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked if other issues arise (see following)

Where did the incident or incidents take place?

Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

What is child's own understanding of what occurred?

Does the young person know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have an understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care.

#### Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

#### Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

If it has been the young person who has been harmed

What support they require depends on the individual young person. It may be that they wish to seek counselling. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people as a focus on the intervention that is being delivered by Nudge Education.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst on an intervention with Nudge Education so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

If it was the young person who has displayed harmful behaviour

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have harmed themselves in a similar way. In such cases support such as counselling may also be necessary. Particular support from identified services may be necessary through a CAF/strengthening families/early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, Nudge Education may help facilitate a restorative justice exercise at the request of the commissioner. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service).

Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi- agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

#### After-care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

#### Preventative Strategies

It is important to develop appropriate strategies in order to prevent the issue of child-on-child abuse rather than manage the issues in a reactive way. This will be done by thorough ongoing assessment and feedback involving all appropriate professionals and stakeholders.

- Firstly, recognition that child-on-child abuse can occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in order to support young people to talk about any issues and through sharing information with relevant staff.
- Nudge Education has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This can be strengthened through strong and positive PHSE/SMSC activities and projects that tackle such issues as prejudiced behaviour and gives children an open forum to talk things through. With the UK Government making it compulsory to teach students about Relationships Education for primary-aged children and Relationships and Sex Education (RSE) for secondary-aged children from September 2020 ([Guidance Document here](#)), It will be at the heart of our interventions to ensure that young people

have relevant opportunities to learn and discuss relationships and sex in an open forum to ensure that respect and understanding is fostered.

- To enable such an open and honest environment it is necessary to ensure the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another. In order to create such an environment, it is necessary for all staff to be trained and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.
- It is important that signposting is available to young people in the event that they don't feel confident raising an issue to staff or a peer. It is useful to have a resource board with support services on a wide range of issues so young people can seek their own solutions should they wish to. In the same way external services or support programmes could be brought in to talk to young people about specific issues in support of the prevention of child-on-child abuse.
- Finally, it is useful to ensure young people are part of changing their circumstances and that of the procedures within communities and the wider environment.

ANNEX E: Escalation pyramid of safeguarding concerns.



## **ANNEX F: NEW 2023** Children Missing Education Process

As an organisation that aims to serve children that are chronically disengaged from education, our thresholds for what constitutes 'missing from education' differs from schools and statutory settings, however, as part of a team of stakeholders that are working to safeguard children from harm we take any intervention that we are unable to secure engagement very seriously.

We have taken best practice examples from existing commissioner policies as well as Government Guidance: [Children Missing Education](#) and [Missing Children and Adults Strategy](#)

We find there are several reasons why a child would persistently be absent from our sessions:

### **SAFEGUARDING CONCERNS**

Non-attendance to sessions may be a warning sign of safeguarding concerns such as neglect, abuse or exploitation. Where we are unable to physically see or speak with a student for two consecutive sessions, then a safeguarding concern should be raised unless we have prior information from a commissioner or appropriate person (e.g youth justice, CAMHS professional) confirming this would be unnecessary. In this instance, the process in Annex A as per any safeguarding concern would be followed.

### **PARENTAL SUPERVISION/ENGAGEMENT**

Where we can ascertain that non-engagement is due to parental engagement (not ensuring child is ready for sessions, actively promoting the benefits of education etc) and we do not feel that this is a safeguarding concern the following process would be followed:

1. Case Manager to report non-engagement & attendance to commissioner.
2. Where advised, we will also reach out to the relevant Children Missing Education(CME) officer in the Local Authority.
3. We will work with parent/carer to help promote positive modelling of the education intervention process.

### **CHANGE OF ADDRESS**

This is particularly common where we work with Looked-After Children (LAC) or those with known, live safeguarding concerns.

Where we are unable to access a student at the registered home address for two consecutive sessions, or where we find out that the student address has changed, we will:

1. Collect new address where possible and collect name and contact details of person who gives us this information and pass this on to the commissioner
2. Check with the commissioner that they have updated information which would allow us to continue the intervention.
3. If neither Nudge Education or the Commissioner has the updated address information, we will follow the commissioner's Child Missing Education policy
4. If we are able to continue with current practitioner then this will be arranged, if the child has moved out of the local area, online support will be offered until we can find a new member of staff, should this support be needed