

SAFEGUARDING AND CHILD PROTECTION POLICY FOR MARSH HOUSE STUDIO

Updated: September 2026

Review date: September 2027

**Adapted from the Model policy Produced by the Safeguarding in Education Team for
Luton Council**

Adapted by Marsh House Studio

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Provision acknowledgement

At Marsh House Studio, we are committed to safeguarding and child protection in line with the statutory guidance.

All staff, including those who do not work directly with children, are required to read and understand Part One of Keeping Children Safe in Education 2026 in full and to follow Marsh House Studio safeguarding procedures.

Marsh House Studio is a specialist alternative provision in Luton supporting school-age and post-16 learners. Safeguarding arrangements are applied according to each learner's age, needs, placement arrangements and circumstances, with statutory child safeguarding duties applying to all learners under the age of 18.

The DSL is: Michael Ross

The Deputy DSL is: Deborah Murphy

The Safeguarding Officers are: Michael Ross

The Prevent SPOC is: Michael Ross

The Operation Encompass SPOC is: Michael Ross

LADO: Paul James - LADO@luton.gov.uk

Multi Agency Safeguarding Hub (MASH): 01582 547653 during office hours; 0300 300 8123 out of hours; mash@luton.gov.uk. Emergency: 999.

https://m.luton.gov.uk/Page/Show/health_and_social_care/safeguarding/safeguarding_children/Pages/default.aspx?redirectToMobile=True

Local Multi Agency Safeguarding Arrangement

Note:

The Children and Social Work Act 2017 replaced Local Safeguarding Children Boards with local multi-agency safeguarding arrangements led by the three statutory safeguarding partners: the local authority, the Integrated Care Board and the chief officer of police. Education providers are relevant agencies within these arrangements. Marsh House Studio works in accordance with the Luton Safeguarding Children Partnership (LSCP) and the Pan Bedfordshire inter-agency safeguarding procedures.

PART ONE: SAFEGUARDING POLICY

**Ratified by the Director: 11th September 2026
(annually): 1st September 2027**

To be reviewed

1. Introduction

1.1 Safeguarding is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing the impairment of children's mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

1.2 Child Protection is defined as:

- activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. (Working Together, DfE 2026)

This includes, but is not limited to safeguarding children in specific circumstances:

- | | |
|---|--|
| • Neglect | • Physical abuse |
| • Emotional abuse | • Sexual abuse |
| • Bullying, including online and prejudice-based bullying | • Racist, disability and homophobic or transphobic abuse |
| • Gender based violence/violence against women and girls | • Radicalisation and/ or extremist behaviour |
| • Child Sexual Exploitation and trafficking | • Child-on-child abuse |
| • Teenage relationship abuse | • Substance abuse |
| • Gang/youth violence including initiation/hazing | • Domestic abuse/violence |
| • Female Genital Mutilation | • Forced marriage |
| • Fabricated/induced illness | • Poor parenting |
| • Online including grooming via social networking, online gaming, video messaging | • The impact of new technologies on sexual behaviour: e.g. Making or Sharing Nudes or Semi-Nudes |
| • Self-harm behaviours | • Children with mental health difficulties or illness |
| • Upskirting | • Contextual/Extra familiar risks |

Marsh House Studio is committed to safeguarding and promoting the welfare of all its children. We believe that:

- all children/young people have an equal right to be protected from harm

- children/young people need support which matches their individual needs, including those who may have experienced abuse
- all children/young people have the right to speak freely and voice their values and beliefs
- all children/young people must be encouraged to respect each other's values and support each other
- all children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs
- Marsh House Studio can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours (behaviours which may be perceived to be 'risky')
- all staff, volunteers and visitors have an important role to play in safeguarding children and protecting them from abuse.

Marsh House Studio will fulfil its local and national safeguarding responsibilities and have regard to the following current legislation, statutory guidance and local procedures:

- **Working Together to Safeguard Children (DfE, 2026)**
- Keeping Children Safe in Education 2026 (DfE)
- Information sharing to safeguard children and young people (DfE, 2026)
- **The procedures of the Pan Bedfordshire [Safeguarding Children Partnerships and Safeguarding Adults Boards](#)**
- [The Children Act 1989](#)
- The Education Act, 2002 (**s175 / s157**)
- [What to do if you are worried a child is being abused \(DfE, 2015\)](#)
- Restrictive interventions, including the use of reasonable force, in schools (DfE, effective from 1 April 2026)
- [Mental health and behaviour in schools: departmental advice \(DfE, 2018\)](#)
- [Preventing and tackling bullying: Advice for Head teachers, staff and governing bodies \(DfE, 2017\)](#)
- [Prevent duty guidance: England and Wales \(2023\)](#)
- Data (Use and Access) Act 2025

Keeping Children Safe in Education 2026 (DfE)

Working Together to Safeguard Children 2026 (DfE)

Information sharing to safeguard children and young people (DfE, statutory guidance, 2026)

Non-school alternative provision: voluntary national standards (DfE, 2025)

- Generative artificial intelligence (AI) in education and Generative AI: product safety expectations (DfE)
- [Serious Crime Act 2015](#)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (current guidance)
- [Criminal exploitation of children and vulnerable adults county lines \(Home Office guidance 2023\)](#)
- Children missing education: statutory guidance for local authorities and schools (DfE, current version)
- [Statutory guidance on children who run away or go missing from home or care \(DfE, 2017\)](#)
- [Child sexual exploitation: definition and guide for practitioners \(DfE, 2017\)](#)
- [The Domestic Abuse Act 2021](#)
- [Drugs \(DfE and ACPO guidance\)](#)
- [Sharing nudes and semi-nudes: advice for educational settings \(2024\)](#)
-
- Alternative Provision: statutory guidance for local authorities and schools (DfE, updated 2025)

2. The Designated Safeguarding Lead

Our Designated Safeguarding Lead **Michael Ross**, is a member of the Senior Leadership Team and takes lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children/young people in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children/young people's attendance, engagement and achievement at school.

They will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the Multi-Agency Safeguarding Hub (MASH), Children's Social Care, health, police etc

The Designated Safeguarding Lead (Michael Ross) is supported by the following Deputy Designated Safeguarding Lead:

Deborah Murphy

The Deputy Designated Safeguarding Lead is trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility for safeguarding and child protection (including online safety, filtering and monitoring). Robust DSL cover arrangements are maintained whenever the DSL is unavailable. The Deputy DSL will act as the safeguarding lead during such periods and will have access to the information, secure records and referral routes required to respond without delay.

Safeguarding information will be communicated through secure and confidential channels. Urgent safeguarding concerns must never be left solely in an unattended personal inbox or otherwise delayed because a particular member of staff is unavailable.

The Designated Safeguarding Lead is supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures Marsh House Studio put in place to protect them.
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

When Marsh House Studio has concerns about a child, the Designated Safeguarding Lead or Deputy will consider the concern against current Luton thresholds and assessment protocols and decide what action is required. This may include support through universal services or community-based early help, a referral for targeted early help through Family Help, a referral to the Multi-Agency Safeguarding Hub (MASH), or a request for statutory assessment under section 17 or section 47 of the Children Act 1989. The Director will be kept appropriately informed while maintaining confidentiality.

The DSL at Marsh House Studio will refer to the Model Setting Concern Process if a concern becomes apparent regarding a child. For further information, please see Appendix Twelve.

The DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with Working Together to Safeguard Children (2026). the NPCC – when to call police should help the DSL understand when they should consider calling the police and what to expect if they do so.

For further information on the roles and responsibilities of the DSL, please see Appendix One.

The Designated Safeguarding Lead will not disclose to a parent any information held on a child if this would put the child at risk of significant harm. In such circumstances, advice will be sought from Children's Social Care.

If a child moves from Marsh House Studio, the Designated Safeguarding Lead will ensure child protection records are forwarded on to the Designated Safeguarding Lead at the new school, with

due regard to their confidential nature and in line with current government guidance on the transfer of such records.

The Designated safeguarding lead shall ensure the child protection files are transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives (KCSIE 2026) .

The designated safeguarding lead will also consider if it would be appropriate to share any information that would allow the new school or setting to continue supporting children/young people , in advance of the child/young person leaving.

Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. We will record where and to whom the records have been passed and the date. We will ensure secure transit and obtain a confirmation of receipt.

If sending by post, children's records will be sent by "Special/Recorded Delivery". For audit purposes, a note of all children's records transferred or received should be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

- if a child is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation
- if a child is being removed from Marsh House Studio roll in order to be home educated, Marsh House Studio will ensure all relevant safeguarding information is shared with the Elective Home Education team
- where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support
- when a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder - this exchange should be recorded as part of the incoming role holder's induction/performance management.
- in exceptional circumstances when a face-to-face handover is not feasible, the Director will ensure that the new post holder is fully conversant with all procedures and case files.

3. Overall Aims

This policy will contribute to safeguarding our children and promoting their welfare by:

- Clarifying standards of behaviour for staff and children
- contributing to the establishment of a safe, resilient and robust ethos in Marsh House Studio, built on mutual respect, and shared values
- creating an organisational culture that is safe for children
- introducing appropriate work within the curriculum
- encouraging children and parents to participate
- developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns
- addressing concerns at the earliest possible stage in the least intrusive way.

4. Key Principles

- always see the child first and consider what life is like for the child, maintaining a culture of vigilance.
- provide support and intervention at the earliest possible opportunity, including through universal services, community-based early help and targeted early help through Family Help where appropriate.
- have conversations, build relationships and maintain professional curiosity.
- focus on securing improved outcomes for children.
- build a culture of openness and transparency where all staff are able to demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children.
- every child is entitled to a rich and rounded curriculum.
- when issues arise, Marsh House Studio Staff should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with interagency procedures.

5. Key processes

All staff should be aware of the guidance issued by the SCPs within the Threshold of need Guide in order to secure support and intervention for children and young people at the earliest possible opportunity in the least intrusive way. This document is integral to safeguarding children/young people in Luton's educational establishments and we will always use the [Effective Support Document](#) to underpin decision-making.

6. Expectations

All staff and regular visitors will:

- be familiar with this safeguarding policy and implement this consistently in the course of their work with children and young people
- be aware of the role and identity of the Designated Safeguarding Lead/s and deputies for Marsh House Studio
- refer child protection concerns to Children's Services in the absence of the designated safeguarding lead and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to
- be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- be involved, where appropriate, in individual education programmes, community-based early help or Family Help assessments and plans, Child in Need plans and Child Protection plans.
- be alert to signs and indicators of safeguarding concerns and possible abuse

recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, and understand that this can affect welfare, wellbeing, mental health and willingness to seek help.

- record concerns and pass the record to the Designated Safeguarding Lead, or a member of the Safeguarding Team
- recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the SCPs
- deal with a disclosure of abuse from a child in line with the guidance in Appendix Four
- All staff will receive safeguarding and child protection training at induction, including online safety and an understanding of filtering and monitoring roles and responsibilities. Training will be regularly updated, with safeguarding updates provided at least annually and more often where required.
- the DSL and Deputy DSL will undertake role-specific safeguarding training and keep their knowledge and skills up to date at least every two years, supplemented by regular updates, professional learning and local safeguarding briefings.
- in addition to the above, all staff will receive annual safeguarding updates, which may include E-learning, circulation of information and guidance internally, staff meetings, inset training

- the subject / topics for training and updates will take into consideration LSCP priorities, local context, and needs of our pupils and identified training needs of staff.

7. The Senior Leadership Team

The Senior Leadership Team will ensure that Marsh House Studio complies with its safeguarding responsibilities and has regard to Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and local safeguarding arrangements. Policies, procedures, staff training and day-to-day practice will be reviewed so that they remain effective and lawful.

The Senior Leadership Team should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

The nominated person for child protection at Marsh House Studio is Michael Ross.

The Senior Leadership Team is responsible for liaising with the Designated Safeguarding Lead over all matters regarding child protection issues. The role is strategic rather than operational; they will not be involved in concerns about individual children.

Please see Appendix Two for more information on the roles and responsibilities and of the Senior Leadership Team.

8. A Safer Culture

The culture at Marsh House Studio is one that is safe for children and unsafe for adults that may pose a risk to children. There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the Designated Safeguarding Lead or the Deputy Safeguarding Lead when concerns relate to an adult.

Marsh House Studio has a culture of listening to and hearing the voice of the child.

9. Inspection

- **Marsh House Studio will maintain safeguarding arrangements that are ready for scrutiny by commissioners, placing schools, the local authority and any inspectorate or regulatory body with jurisdiction over the provision. Where Ofsted inspection requirements apply, safeguarding effectiveness will be evidenced through policy, practice, records and the experiences of learners.**
- Marsh House Studio will be aware of the new inspection guidance and the requirements from Ofsted. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.

- The Independent Schools Inspectorate (ISI) is approved to inspect certain independent schools and will also report on safeguarding procedures. ISI has a published framework which informs how they inspect at Independent Schools.

10. Safer Recruitment and Selection

Marsh House Studio follows safer recruitment principles in Keeping Children Safe in Education 2026. Recruitment includes appropriate scrutiny of applications and employment history, identity and qualification checks, references, interview and the relevant Disclosure and Barring Service (DBS), barred list, prohibition, overseas and other checks required for the role.

Shortlisted candidates will be informed that online searches may be carried out as part of due diligence. Recruitment decisions and checks will be recorded appropriately, including on the Single Central Record where required.

The definition of regulated activity has changed following the Crime and Policing Act 2026 and the previous “supervision exemption” for volunteers has been removed. A volunteer who teaches, trains, instructs or supervises children frequently, or provides relevant personal care, may therefore be in regulated activity even where supervised. Marsh House Studio will determine the correct level of DBS and barred list check for each role in accordance with KCSIE 2026 and current DBS guidance.

A volunteer who is not in regulated activity will not be left unsupervised with children where appropriate checks have not been obtained. Marsh House Studio will complete and retain a written risk assessment when deciding what checks are appropriate for a volunteer who is not in regulated activity.

Where self-employed practitioners, contractors, agency staff, visiting professionals or trainee teachers work with learners, Marsh House Studio will obtain or verify the appropriate safeguarding assurances and checks for the role and will make clear the shared safeguarding responsibilities with any third-party organisation.

Where relevant to a role, Marsh House Studio will consider section 128 checks and any applicable teaching prohibition or restriction checks. Michael Ross and Deborah Murphy have undertaken safer recruitment training and at least one appropriately trained person will be involved in recruitment decisions.

Recruitment and safeguarding decisions will also have regard to the Equality Act 2010 and, where applicable, the Public Sector Equality Duty, while keeping the welfare and safety of children central.

Work experience and external vocational placements will be risk assessed. Safeguarding arrangements, supervision, the nature of the activity and any required checks will be considered in line with KCSIE 2026 before a placement begins and kept under review.

Visitors will be managed according to the purpose of their visit and the level of access they require. Visitors who do not have an appropriate safeguarding role or verified checks will not be given unsupervised access to children. Regular contractors, visiting professionals and others working directly with learners will be subject to the appropriate assurances and checks for their role.

11. Operation Encompass

Marsh House Studio works with Luton Council and Bedfordshire Police through Operation Encompass so that relevant information about domestic abuse and, where applicable, missing-person notifications can be shared promptly with the DSL or Deputy DSL to support the child. Operation Encompass information is treated as safeguarding information and handled securely.

The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in Marsh House Studio before the child or children arrive at Marsh House Studio the following day.

This ensures that Marsh House Studio has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or Marsh House Studio should make a referral to local authority children's social care if they are concerned about a child's welfare.

Marsh House Studio has an information sharing agreement in place with Bedfordshire Police for Operation Encompass.

Marsh House Studio will receive Missing Persons notifications should a child go missing, in line with the addition to Operation Encompass.

12. Our Role in the Prevention of Abuse

In accordance with Working Together to Safeguard Children 2026, Marsh House Studio recognises the need to safeguard children from abuse, neglect and exploitation and to work effectively with local safeguarding partners.

Appendix Three contains more information about definitions and indicators of abuse, specifically:

- neglect
- emotional abuse

- physical abuse
- sexual abuse

In addition, Marsh House Studio are alert to the need to safeguard children in specific circumstances as defined within Keeping Children Safe in Education 2026.

Our safeguarding policy cannot be separated from the general ethos of Marsh House Studio, which should ensure that children are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

13. The Curriculum

Marsh House Studio recognises that preventative education is most effective as part of a whole-provision approach that prepares learners for life in modern Britain and builds a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence and harassment, derogatory behaviour, discriminatory conduct and other forms of physical violence or conflict.

Marsh House Studio has a clear set of values and standards, reflected throughout provision life and supported by its behaviour expectations, pastoral support and planned learning. Safeguarding education is reinforced through the curriculum and adapted to age, stage of development, SEND, communication needs and other vulnerabilities.

Marsh House Studio has regard for the new statutory guidance [Relationships Education, Relationships and Sex Education and Health Education guidance](#) which has been revised for introduction in September 2026.

This programme will address, at an age- and developmentally-appropriate level, matters including: racism, faith-based prejudice, discriminatory behaviour, misogyny, misandry and other forms of prejudice-based harm, including how to challenge and report them safely.

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships
- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it

14. Online Safety

Online safety is a safeguarding responsibility and is considered across policy, curriculum, staff training, filtering and monitoring, behaviour expectations and work with parents/carers and placing professionals.

Marsh House Studio understand the importance of children being safeguarded from potentially harmful and inappropriate online material. Our whole approach to online safety aims to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

We understand that online safety is considerable and ever evolving, but categorise into four areas of risk which inform our online safety policy:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, including images generated or manipulated using AI, and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Marsh House Studio has clear expectations for the use of mobile phones, smart devices and connected technology on site. These expectations balance safe access to technology with the need to reduce distraction, inappropriate recording, harmful communications, access to unsafe content and other safeguarding risks.

For school-age learners, personal mobile phone access during education sessions will normally be restricted in line with the learner's placement arrangements, unless an agreed exception is needed for safeguarding, medical, SEND, reasonable adjustment or educational reasons. Arrangements for post-16 learners will remain proportionate to age, maturity, individual need and the activity being undertaken.

Generative AI may create or amplify safeguarding risks, including fabricated or manipulated sexual imagery, deepfakes, misinformation, bullying, grooming and exposure to harmful content. Staff will apply the same safeguarding, filtering, monitoring and reporting expectations to AI-enabled tools as to other online services.

The effectiveness of filtering and monitoring arrangements will be reviewed at least once every academic year, led by the member of the Senior Leadership Team responsible for filtering and monitoring with support from the DSL and relevant technical support. The review will include

checks that filtering is operating appropriately on internet-connected devices in relevant locations and a record will be kept of those checks.

Safeguarding information and digital records will be protected through appropriate access controls, secure storage, careful use of email and cloud systems, and proportionate information security measures. Staff must report any loss, unauthorised access or disclosure of safeguarding information immediately.

The Department for Education has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education.

14A. Restrictive Interventions, Premises and Activities

Marsh House Studio uses de-escalation, relationships and preventative support first. Any physical intervention or use of reasonable force must be lawful, necessary, proportionate and consistent with Marsh House Studio's separate Use of Reasonable Force and Restrictive Interventions Policy and the DfE guidance effective from 1 April 2026. Particular care will be taken where a learner has SEND, a medical condition or mental health needs, including consideration of reasonable adjustments and individual planning.

Where Marsh House Studio premises are used by another organisation or individual to run activities for children, appropriate safeguarding arrangements will be required. Any allegation arising from such activity will be managed under safeguarding procedures, including consideration of LADO referral.

Where sport or physical activity is provided or arranged, safeguarding, equality, supervision, medical needs and the safety and dignity of learners will be considered in planning and delivery.

15. Alternative Provision

Marsh House Studio is itself a specialist alternative provision and receives school-age and post-16 learners through referrals and commissioning arrangements from schools, local authorities and other appropriate referrers. Safeguarding responsibility is shared in practice: the commissioning body retains its own safeguarding duties, while Marsh House Studio is responsible for safeguarding learners while they attend and for acting promptly on concerns.

For each placement, Marsh House Studio will seek sufficient information from the commissioner to understand the learner's needs, risks, safeguarding history, EHCP or support arrangements, attendance context, relevant professional involvement and emergency contacts. Information will be handled in accordance with safeguarding information-sharing requirements and data protection law.

Marsh House Studio will communicate safeguarding concerns, significant attendance concerns, changes in risk and other relevant information to the placing organisation and statutory agencies

as appropriate. A lack of information from a commissioner will not prevent Marsh House Studio from taking safeguarding action where a child may be at risk.

Where Marsh House Studio arranges or commissions any external provision, activity, subcontracted placement or work experience for a learner, it will undertake due diligence and obtain appropriate safeguarding assurances. It will know where the learner is based, maintain relevant contact and attendance information, and review the arrangement at least half termly or more frequently where risk requires.

Where safeguarding concerns arise about an external placement, the arrangement will be reviewed immediately and suspended or ended where necessary unless and until concerns have been satisfactorily addressed.

Marsh House Studio has regard to the DfE statutory guidance Alternative Provision (updated 2025) and the Non-school alternative provision: voluntary national standards (2025), alongside KCSIE 2026 and local commissioning requirements.

16. Safeguarding in specific circumstances: Children who are vulnerable to extremism

- Marsh House Studio seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- In accordance with the Prevent Duty and Marsh House Studio's safeguarding responsibilities, we recognise the need to protect children and young people from radicalisation and involvement in terrorism. Radicalisation and extremist influence are treated as safeguarding concerns.
- Marsh House Studio values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to Marsh House Studio are the fundamental British Values of Democracy, Rule of Law, Equality of Opportunity, Freedom of Speech and the rights of all women and men to live free from persecution of any kind and it would be expected that views and opinions expressed would be commensurate with these.
- Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix Six.

Risk reduction

- The Senior Leadership Team and the Designated Safeguarding Lead will assess the level of Prevent-related risk within Marsh House Studio and put proportionate actions in place. The assessment will consider the

provision's curriculum, learner profile, SEND and communication needs, use of premises, online activity, external visitors and speakers, local context and any other relevant factors.

- In addition, Marsh House Studio's Prevent Action Plan template may be used to demonstrate how the organisation is fulfilling the prevent duty. Please see Appendix Twelve.
- In accordance with the Prevent Duty, Michael Ross is the Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.
- When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person. Concerns must be recorded on Marsh House Studio's safeguarding referral form.
- If a child or young person is thought to be at risk of radicalisation, a referral will be made using the National Prevent Referral Form which shall be sent directly to the Police.
- Initial advice regarding Prevent related concerns or whether to submit a referral will be sought from Bedfordshire Police by emailing Prevent@beds.police.uk.

Where a Channel referral is considered or made, relevant safeguarding information will be shared with the police and other appropriate partners in accordance with the Prevent Duty, Channel guidance, KCSIE 2026 and information-sharing law.

- In all cases, in accordance with advice provided from the Channel Team or the Multi Agency Safeguarding Hub, Marsh House Studio will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children assessed as being vulnerable to radicalisation.
- If Marsh House Studio are concerned that a child/young person may be at risk of significant harm in relation to radicalisation or involvement in violent extremism, a child protection referral will be made to Children's Social Care .

17. Safeguarding Children in Specific Circumstances: Female Genital Mutilation / Forced Marriage / Modern Day Slavery

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.
- FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM or help someone trying to do this.

- Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **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. This is in addition to following the school's safeguarding reporting procedures. A teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions.
- Those failing to report such cases will face disciplinary sanctions.
- If Marsh House Studio are concerned that a child/young person has experienced or is at risk of FGM, a Child Protection referral will be made to the MASH in accordance with interagency procedures produced by the LSCP. In addition, all teachers will follow mandatory reporting duties. Please refer to One Minute Guide FGM (Further information regarding FGM can be found in Appendix Seven)
- A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.
- The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.
- The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry - this includes:
 - taking someone overseas to force them to marry (whether or not the forced marriage takes place)
 - marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
 - breaching a Forced Marriage Protection Order.
- Further multi-agency statutory guidance for dealing with forced marriage can be found here [The right to choose: government guidance on forced marriage.](#)
- Modern slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol). Modern slavery crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.
- Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

Types of human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- sexual exploitation
- forced labour
- domestic servitude
- organ harvesting
- child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- forced marriage and illegal adoption (if other constituent elements are present).

18. Safeguarding Children in Specific Circumstances: Child-on-child abuse (including harassment and violence)

Child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child alleged to have caused harm. It is preventable and may range from harmful or discriminatory behaviour through to serious physical harm, sexual harassment, sexual violence or threats involving weapons. Safeguarding issues can overlap and each child's needs and risks will be considered individually.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of Marsh House Studio, and/or can occur between children outside of this environment.

All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of exploitation or abuse outside of 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.

- Marsh House Studio recognises that children can abuse other children and such behaviours are never viewed simply as 'banter' or as part of growing up. We recognise that child-on-child abuse can take many different forms such as:

bullying, including cyberbullying, prejudice-based and discriminatory bullying;

discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents;

derogatory behaviour, harassment or other forms of physical violence and conflict;

abuse within intimate personal relationships between children;

physical assault or threats of physical harm, including threats involving weapons;

- cyber-bullying
- consensual or non-consensual making or sharing of nudes or semi-nudes, including images created, altered or generated using AI;

- sexual assault
 - sexual violence or harassment
 - upskirting
 - sexually harmful or problematic behaviour
 - gang initiation or hazing type violence
 - harassing messages and misogynistic messages
 - the non-consensual sharing of indecent images
 - the sharing of abusive images and pornography, to those who do not want to receive such content
 - sexual exploitation connected to the making, sharing or threatened sharing of nudes or semi-nudes;
- Upskirting is an illegal offence which 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.
 - Marsh House Studio recognises indicators that a child may be at risk of, or involved in, serious violence. These can include increased absence, changes in friendship groups or association with older individuals, a decline in engagement or performance, self-harm, changes in wellbeing, unexplained injuries, gifts or possessions, previous offending or victimisation, disrupted education and time spent in alternative provision. Risk may be heightened at particular times and places around the education day. Staff will share concerns promptly and the DSL will work with relevant partners to assess and reduce risk.

Where information indicates that a learner has carried, threatened with or used a knife or other weapon, the DSL will assess immediate safeguarding risk, consider police and Children's Social Care involvement, and ensure appropriate safety planning and information sharing with relevant receiving or placing settings.

- Contextual safeguarding/extra familial risk as referenced in KCSIE (2026) highlights that 'assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process'.
- Contextual safeguarding can also be known as 'risk outside the home' (Working Together, 2026)
- Marsh House Studio has a thorough understanding of contextual safeguarding and will make a referral in the first instance if apparent.

Marsh House Studio has adopted a Child-on-child Abuse Policy which outlines the actions Marsh House Studio will take in responding to reports of Child on child abuse.

- Marsh House Studio manage the use of mobile and smart technology on the premises and reflect this in the behaviour / child protection policy.

- We carry out an annual review of our approach to online safety, filtering and monitoring supported by an annual risk assessment that considers the risks to children.

'Report Abuse in Education' (NSPCC helpline) is still available. Young people and adults can contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

19. Safeguarding Children in Specific Circumstances: Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence

Marsh House Studio recognises a continuum of sexual behaviour, from developmentally expected behaviour through harmful sexual behaviour (HSB) to sexual harassment and sexual violence. Behaviour will be considered in context, including age, developmental stage, SEND, power imbalance, coercion, consent, impact and any wider safeguarding concerns.

Staff, particularly the DSL and Deputy DSL, will understand that consent requires freedom and capacity to choose, can be withdrawn at any time and must relate to each sexual activity. A child under 13 can never consent to sexual activity. The age of consent is 16, while safeguarding decisions will always consider age difference, power imbalance, coercion, exploitation and the individual circumstances.

- Where a child displays sexualised behaviour, staff will not dismiss it as "banter" or an inevitable part of growing up. The DSL or Deputy will consider the behaviour in a child-centred way and use appropriate professional resources or specialist advice to help determine whether it is developmentally expected, problematic or harmful.
- Marsh House Studio follows Keeping Children Safe in Education 2026 and local inter-agency procedures when responding to HSB, sexual harassment or sexual violence. Reports will be handled in a child-centred way. The DSL or Deputy will consider an immediate risk and needs assessment for the child who has experienced harm, the child alleged to have caused harm, and any other children who may be affected, with specialist or statutory assessment sought where required.
- The Lucy Faithfull Foundation has developed a [HSB Toolkit](#), which amongst other things, provides support, advice and information on how to prevent Harmful Sexual Behaviour, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

- We will seek specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.
- All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

Any making or sharing of nudes or semi-nudes involving a child will receive a safeguarding response, whether the sharing was consensual or non-consensual. This includes images that are photographed, filmed, livestreamed, digitally altered or wholly generated using AI, including deepfakes or “deep nudes”.

- In all cases of child-on-child abuse Marsh House Studio will consider the vulnerability of all children including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response consistent with the Luton Effective Support Framework. Consideration will be given to violence in young people’s relationships.
- Where necessary, Marsh House Studio’s Behaviour and Child on Child Abuse policy will be invoked, and any sanctions applied will be consistent with these procedures.
- Where issues indicate that a criminal offence may have been committed, a report will be made to Bedfordshire Police.

20. Safeguarding Children in Specific Circumstances: Gang related violence (Contextual/Extra Familial Risk)

- Marsh House Studio recognises the risks posed to children in relation to involvement in gang related activity, which may be street gangs, peer group or organised crime. Young people who are involved in gangs are more like to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of an initiation or hazing practice.
- Marsh House Studio understands that early identification and support can be crucial where a child may be affected by gang activity, criminal exploitation or serious violence. Support may include community-based early help, targeted Family Help and/or referral to statutory services according to risk and need.
- If, however, information suggests a child may be at risk of significant harm due to gang related activity, a referral will be made to Children’s Social Care.
- Where there are concerns that a child/young person may be, or is at risk of, becoming involved in gang related activity, a referral will be made to the Serious Youth Violence Panel in accordance with local procedures as part of the safeguarding response.

- Marsh House Studio understand the process of completing a multi-agency information sharing form which highlights broader concerns contextually occurring outside of the child's home.
- See Appendix Nine for further information on risk indicators for gang involvement.

21. Safeguarding Children in Specific Circumstances: Making or Sharing Nudes or Semi-Nudes

For this policy, “making or sharing nudes or semi-nudes” includes the creation, sending or posting of nude or semi-nude images by children under 18. Images include photographs, videos and livestreams and may be self-generated, taken by another person, digitally altered or wholly generated using AI.

- Marsh House Studio recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the Guidance issued by the [UK Council for Child Internet Safety](#) in relation to how we respond to incidents. [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\)](#)
- All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether consensual or non-consensual. The following actions will be undertaken:
 - the incident should be reported to the Designated Safeguarding Lead as soon as possible
 - the Designated Safeguarding Lead should hold an initial review discussion or meeting with appropriate staff
 - there should be subsequent interviews with the young people involved (if appropriate)
 - parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
 - at any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care and/or Bedfordshire Police immediately.
- An immediate referral will be made to Bedfordshire Police and Social Care in the following circumstances:
 - the incident involves an adult
 - there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
 - the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 - the imagery involves sexual acts and any pupil in the imagery is under 13

- there is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.
- Where immediate referral to police or Children's Social Care is not indicated, the DSL may manage the safeguarding response within Marsh House Studio in consultation with relevant professionals and the placing organisation as appropriate. The incident will still be treated as a safeguarding matter, risk will be assessed, support will be provided, and the rationale for decisions will be recorded.
- Marsh House Studio will pay due regard to the [Department for Education guidance: Searching, Screening and Confiscation advice](#).
- Adults at Marsh House Studio will not intentionally view, copy, print, forward or store nude or semi-nude imagery unless there is an exceptional and clear safeguarding reason and this is consistent with current guidance. Wherever possible the DSL will make decisions based on what has been reported about the imagery rather than viewing it.
- All incidents will be recorded.

More information is available in Appendix Eight.

22. Safeguarding Children in specific circumstances: 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 imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity. Whilst age may be most obvious factor, 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. This abuse can be perpetrated by individuals or groups, males or females and children/young people 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 maybe accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CSE and CCE may be committed or facilitated by an individual, group, gang or organised network. Exploitation may constitute modern slavery and can involve sexual, criminal or financial exploitation, trafficking, coercion, debt bondage, threats or violence. A child may identify with or feel loyalty towards the group exploiting them.

Children may be criminalised for actions carried out under coercion or exploitation. Apparent consent does not remove the need for a safeguarding response. Most child sexual abuse is

committed by people known to the child, and staff will remain professionally curious where relationships or circumstances appear controlling, exploitative or unsafe.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child/young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

All staff will be aware that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

The school will have procedures in place in managing poor school attendance and this will need to be regularly reviewed.

Child sexual exploitation can occur through use of technology without the child/young person's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child/young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Marsh House Studio recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such ensure staff are alert to signs and indicators

- Marsh House Studio recognises that there are various 'models' of CSE which include but not limited to:
 - gangs and groups
 - boyfriend/girlfriend model
 - child on child
 - familial
 - online
 - abuse of authority
- Where concerns are identified in relation to Child Sexual Exploitation the [Effective Support Document](#) will be consulted in order to ensure the child/young person receives support at the earliest possible opportunity.

- Where coordinated targeted support is required, Marsh House Studio may contribute to or, where agreed locally, help coordinate a Family Help response. Where statutory thresholds are met, a referral will be made to the MASH/Children's Social Care.
- If a child is thought to be at risk of significant harm through child sexual exploitation a referral will be made to MASH.
- Advice will be sought to establish if a [National Referral Mechanism](#) is appropriate.
- In all cases, intelligence will be shared with Bedfordshire Police using the multi-agency information sharing form which will also be copied to the Multi Agency Safeguarding Hub (MASH).
- [Resources for education settings | CSA Centre](#) will be utilised to strengthen our approach to Child Sexual Abuse.

23. Children in specific circumstances

Further guidance in relation to safeguarding children in specific circumstances can be found on the [Bedford Borough, Central Bedfordshire & Luton Safeguarding Children Boards Procedures website](#). [Contents](#)

24. Mental Health

All staff recognise that mental health difficulties can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff are not expected to diagnose mental health conditions, but they are expected to notice changes, listen to learners, record concerns and seek appropriate support.

Where a mental health concern is also a safeguarding concern, staff will follow this safeguarding policy immediately and report to the DSL or Deputy DSL. Safeguarding and mental health needs may overlap and will not be treated as separate where risk of harm is present.

Support will be proportionate to need and may include a trusted adult within Marsh House Studio, reasonable adjustments to learning, contact with parents/carers where safe and appropriate, liaison with the placing school or commissioner, community-based or Family Help support, and referral or signposting to health or specialist mental health services.

The DSL will consider whether parents/carers should be informed in order to support the child's wellbeing, unless doing so would place the child at additional risk. Where urgent risk is identified, including risk of significant self-harm or suicide, safeguarding and emergency procedures will be followed without delay.

Marsh House Studio will draw on current DfE and NHS guidance and local services when identifying appropriate mental health support for learners.

25. Homelessness

- Marsh House Studio recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- The designated safeguarding lead (and any deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- Marsh House Studio recognises that whilst in most cases staff will be considering homelessness in the context of children who live with their families, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.
- Staff are aware of the indicators that a family may be at risk of homelessness, to include: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.
- Referrals and/or discussion with the Local Housing Authority will be progressed as appropriate but will not replace a referral into children's social care where a child has been harmed or is at risk of harm.
- The Local Authority has a legal duty to address concerns under the Homelessness Reduction Act 2017. The focus is early intervention and to encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

From 1 September 2026, local housing authorities in England have a temporary accommodation notification duty in relevant cases. Where Marsh House Studio receives such a notification about a learner, the information will be treated as safeguarding and welfare information and considered by the DSL so that appropriate support can be coordinated.

26. Domestic Abuse

- All staff are aware of The Domestic Abuse Act 2021 which introduced the first statutory definition of domestic abuse and recognises that 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 (as below). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

- Staff will continue to develop their understanding of domestic abuse, and how all children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.
- Staff are aware exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- Marsh House Studio recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse.
- Staff understand that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.
- Types of domestic abuse can include intimate partner violence, abuse by ex-partners or family members, teenage relationship abuse, and child-to-parent or caregiver abuse. A child who uses abusive behaviour may also have safeguarding needs and should receive an appropriate safeguarding response.
members, teenage relationship abuse and adolescent to parent violence.
- Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.
- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

27. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Staff will be alert to conduct that may amount to offences under the Computer Misuse Act 1990 as well as to the possibility that a child with strong technical skills may be drawn into harmful or criminal online activity. Concerns will be considered alongside wider safeguarding risks and appropriate diversionary or specialist support.

Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded; Denial of Service (Dos or DDoS) attacks or 'booting'- attempts to make a computer, network or website unavailable by overwhelming it

with internet traffic from multiple sources; making, supplying or obtaining malware such as viruses, with the intent to commit further offences.

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the Designated Safeguarding Lead (or Deputy), should consider referring into the **Cyber Choices** programme.

- Cyber Choices is a nationwide police programme supported by the Home Office and led by the National Crime Agency which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences.
- Additional advice can be found at: [Cyber Choices](#)

28. Children with Special Educational Needs, Disabilities, Health Issues and Other Additional Needs

Staff will remain alert to the risk that signs of abuse, neglect or exploitation may be wrongly attributed to a learner's SEND, communication profile, mental health, behaviour or medical condition. The absence of a verbal disclosure does not reduce the need for professional curiosity.

- Marsh House Studio recognises that while all children have a right to be safe, some children may be more vulnerable to abuse, for example a young carer, a child frequently missing from home/care, children with disabilities or special educational needs, a child living with domestic abuse, parental mental ill health or substance abuse, or a child who has returned home to their family from care.
- We recognise that additional barriers can exist when recognising abuse and neglect in children with special educational needs or disabilities, medical or physical health conditions.
- These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
 - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
 - communication barriers and difficulties in managing or reporting these challenges
 - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so
- Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND.

- Marsh House Studio will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.
- If Marsh House Studio is considering excluding, either fixed term or permanently, a vulnerable child and/or a child who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude.
- Where a parent/carer has expressed their intention to remove a child from Marsh House Studio with a view to educating at home, we work together with Local Authority and other key professionals to coordinate a meeting with parents/carers where possible. We will do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.
- In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Senior Leadership Team.

28A. Young Carers

Marsh House Studio will be alert to the needs of young carers and recognise that caring responsibilities can affect attendance, engagement, attainment, behaviour, emotional wellbeing and a learner's ability to participate fully in education. Early identification is important so that support can be offered at the right time.

Where a young carer is identified, the DSL or appropriate member of staff will consider support within the provision and, with the learner and family where appropriate, liaison with the placing school or commissioner and referral/signposting to relevant local authority, health or young carers services.

28B. Safeguarding Children with Medical Conditions

A medical incident does not automatically amount to a safeguarding concern. However, staff will consider safeguarding action where an incident or pattern suggests neglect, deliberate withholding of treatment or medication, failure to provide essential medical information, repeated attendance without essential medication, fabricated or induced illness, or another circumstance that places the child at risk.

Medical information will be shared on a need-to-know basis so that staff can support the learner safely. Where concerns about care or treatment may indicate abuse or neglect, the matter will be reported to the DSL or Deputy DSL and safeguarding procedures will be followed.

29. Children who are Lesbian, Gay or Bisexual (LGB) and Children who are Gender-Questioning

Being lesbian, gay or bisexual, or questioning gender, is not in itself a safeguarding concern. However, some children may be targeted by peers or others, experience bullying, prejudice, abuse or family conflict, or face additional barriers to seeking help.

A child perceived by others to be LGB or gender-questioning may be vulnerable to the same harms whether or not that perception is accurate. Staff will respond to bullying, harassment, discrimination and safeguarding concerns promptly and will provide a trusted, private opportunity for learners to speak with staff.

Any support will be child-centred, sensitive to the learner's age and circumstances, consistent with safeguarding duties and equality law, and mindful that information about a child's identity or questioning should not be shared more widely than is necessary for their safety and welfare.

30. What we do when we are concerned about a child

All concerns will be considered against current Luton thresholds and assessment protocols so that children receive the right help at the right time. Staff do not need proof of abuse before sharing a concern with the DSL.

Support before statutory intervention may include universal services or community-based early help. Where a child and family require coordinated targeted support, a referral may be made for Family Help in accordance with local arrangements.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral will be made promptly to the Multi-Agency Safeguarding Hub (MASH)/Children's Social Care. If a child is in immediate danger or a crime may have been committed, the police will be contacted as appropriate.

Consent will be sought where appropriate, but consent is not required to share information where there is a lawful safeguarding basis and seeking consent would place a child at risk, prejudice an investigation or cause an unreasonable delay. Data protection law does not prevent the sharing of information for safeguarding purposes.

The DSL will record the concern, information considered, advice obtained, action taken, decisions reached and the rationale, including where a decision is made not to refer.

Marsh House Studio will review whether support and intervention are improving the child's safety and welfare. Where concerns escalate, support is ineffective or there is professional disagreement, the LSCP escalation procedure and Marsh House Studio Escalation Policy will be followed.

31. Involving parents/carers

Where it is safe and appropriate, Marsh House Studio will involve parents/carers in safeguarding and welfare concerns and seek to work openly with families. There are circumstances where information will be shared or a referral made without prior parental agreement, including where informing a parent/carer could increase risk, impede a police or social care enquiry, or cause unreasonable delay in protecting a child. The child's best interests and safety will remain central.

Parents /carers will be informed about the safeguarding policy through Marsh House Studio's website

32. Multi-agency work

- Marsh House Studio understands its role in the Luton Safeguarding Children Partnership (LSCP). Marsh House Studio's Director, Senior Leadership Team and Designated Safeguarding Lead will make themselves aware of and follow local multi-agency safeguarding arrangements. [Luton Safeguarding Children Partnership](#)
- Marsh House Studio work in partnership with other agencies in the best interests of children. Marsh House Studio will, where necessary initiate an effective support response, and make referrals to Children's Social Care. Referrals and contacts should be made by the Designated Safeguarding Lead or one of the Deputy Leads to Family Partnership/Children's Social Care. Where the child already has a social worker, the request for service will go immediately to the social worker involved, or in their absence to their team manager or duty social worker.
- We will co-operate with any child protection enquiries conducted by Children's Social Care: will ensure representation at appropriate inter-agency meetings such as Family Help or other multi-agency meetings, Initial and Review Child Protection Conferences, together with core group meetings.
- We will provide reports as required for these meetings in accordance with the LSCP interagency procedures. If Marsh House Studio is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.
- Where a child is subject to an Inter-agency Child Protection Plan, Child in Need Plan or Family Help plan, Marsh House Studio will contribute to the preparation, implementation and review of the plan as appropriate.
- If a child is subject to a referral to a multi- panel such as MARAC or CHANNEL, Marsh House Studio will contribute to such arrangements.

Marsh House Studio will share relevant, necessary and proportionate information in accordance with Working Together to Safeguard Children 2026, the statutory Information Sharing Duty guidance published in September 2026 (with the duty coming into force on 30 September 2026), UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. Information-sharing decisions will consider safeguarding risk and will not omit information that may be relevant to understanding or managing that risk.

33. Responding to an Allegation or Concern about Staff, Supply Staff, Trainee Teachers, Volunteers, Contractors or Other Adults

- Marsh House Studio will comply with the LSCP procedures for [Allegations and Concerns regarding Staff, Carers and...](#) in all circumstances.
- These procedures apply where it is alleged that a member of staff, supply worker, trainee teacher, contractor, visiting professional, volunteer or other adult working with children 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; or
 - behaved in a way that indicates s/he may pose a risk of harm to children
 - behaved in a way that indicates they may not be suitable to work with children.
- The Director/DSL will consider at the outset whether the concern meets or may meet the harm threshold and whether referral or consultation with the LADO is required. Where the threshold may be met, the LADO will be informed within one working day and immediately where the matter is urgent.
- Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in Marsh House Studio to abuse or mistreat children/young people.
- All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.
- Allegations or concerns about colleagues and visitors must be reported directly to the Director unless the concern relates to the Director. If the concern relates to the Director, it must be reported immediately to the Senior Leadership Team. Alternatively, concerns can be reported directly to the Local Authority Designated Officer (LADO) in Children's Social Care, who will liaise with the Senior Leadership Team and they will decide on any action required.
- Marsh House Studio should follow their safeguarding policies and procedure in the event of an allegation regarding an "incident that happened when an individual or an organisation was using Marsh House Studio premises for the purposes of running activities for children." This includes events such as community groups, sports associations, and more.

- If the Director is not available, the member of staff should report their concerns to the most senior member of staff available who will make contact with the LADO and discuss the concerns.
- Contact with the LADO should happen at the earliest possible opportunity and within 1 working day.
- The LADO in Luton can be contacted at lado@luton.gov.uk
- The LADO may request a referral - if this is requested, the referral will be completed and submitted within 1 working day.
- Marsh House Studio will engage with the LADO at all stages of the management of the allegation/concern and comply with the statutory guidance contained Keeping Children Safe in Education 2026 and Safeguarding Children | Luton.

Where the adult is employed or supplied by a third-party organisation, Marsh House Studio and that organisation share safeguarding responsibilities. Relevant information will be exchanged promptly and Marsh House Studio will remain involved in safeguarding decisions affecting learners even where the employer leads employment action.

- In this regard, Marsh House Studio will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered.
- Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated.
- Should Marsh House Studio dismiss a member of staff/volunteer as a result of a substantiated allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with statutory duty, a referral to the Disclosure and Barring Service will be made.
- If the member of staff is engaged in teaching work, Marsh House Studio will, in accordance with published guidance from the Department for Education, consider whether a referral to the Teaching Regulation Agency (TRA) should be made.
- Marsh House Studio will adhere to the statutory guidance contained within Keeping Children Safe in Education 2026) with regard to record keeping, references and compromise or settlement agreements.
- If an allegation is shown to be deliberately invented or malicious, Marsh House Studio will consider whether any disciplinary action is appropriate against the individual who made it as per Marsh House Studio's behaviour policy.

Marsh House Studio has appropriate policies and processes in place to manage and record any such concerns that do not meet the harm threshold and take appropriate action to safeguard children. (Please see Appendix Five for more information).

If a member of staff, student or volunteer has any concerns about poor, unsafe practice, or failures of the safeguarding regime, they are encouraged to raise this with the Director or, Senior Leadership Team, following the Whistle Blowing Procedures of Marsh House Studio.

The [NSPCC whistleblowing helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email help@nspcc.org.uk. Please click [here](#) for information on the NSPCC website.

APPENDICES

Appendix One

The DSL role reflects Annex B of Keeping Children Safe in Education 2026.

When the DSL is unavailable, the Deputy DSL will provide safeguarding cover with access to secure records, contact details, referral routes and confidential communication channels. Arrangements will be robust enough to ensure that urgent concerns are not delayed.

The Designated Safeguarding Lead will:

The Designated Safeguarding Lead will:

- support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff
- refer cases to the Police where a crime may have been committed.
- keep the Director appropriately informed of significant safeguarding issues, including ongoing enquiries under section 47 of the Children Act 1989 and police investigations, while maintaining appropriate confidentiality.
- be aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – [PACE Code C 2019](#)
- seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required.

- liaise with the Designated Senior Manager for allegations to ensure where necessary referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child.
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making will be recorded in case files.
- ensure safeguarding and child protection information will be dealt with in a confidential manner and in accordance [Safeguarding Children | Luton Borough Council](#)
- ensure staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child/young person and/or family.
- ensure a written record will be made of what information has been shared with whom, and when.
- ensure that child protection files are kept up to date.
- ensure rationale for making decisions is recorded (inc. decision not to make a referral)
- ensure safeguarding and child protection records will be stored securely in a central place separate from academic records.
- ensure individual files will be kept for each child/young person: Marsh House Studio will not keep family files.
- ensure access to safeguarding and child protection records by staff other than by the DSL will be restricted, and a written record kept of who has had access to them and when
- ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff.
- ensure general communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.

Appendix Two

Roles and responsibilities of the Senior Leadership Team

The Senior Leadership Team will ensure that:

- Marsh House Studio contributes to inter-agency working in line with Working Together to Safeguard Children 2026, including support through universal services and community-based early help, targeted Family Help where appropriate, and inter-agency plans for children subject to Child in Need or Child Protection arrangements.
- Marsh House Studio provides an appropriate safeguarding response in accordance with the Luton Effective Support framework in order to safeguard children.
- online safety is a running and interrelated theme whilst devising and implementing the whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety, filtering

and monitoring whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

- Marsh House Studio pays due regard to the need to safeguard children in specific circumstances such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), vulnerability to radicalisation, Female Genital Mutilation (FGM) or child-on-child abuse which can include gang related violence, cyberbullying, sexually harmful behaviours, sexual violence, sexual harassment, upskirting or making or sharing nudes or semi-nudes.
- the child protection policy reflects and addresses additional challenges exist for those children with special educational needs and disabilities and physical and mental health needs, and Marsh House Studio should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.
- Marsh House Studio maintains information about the legal status of all children including whether a looked after child is subject to S20 voluntary agreements, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child/young person
- there is a designated teacher with the appropriate training skills and knowledge appointed to work with the virtual school head to promote the academic achievement of looked after children and children previously looked after

where relevant, Marsh House Studio will work with the Virtual School Head and placing professionals to support the attendance, engagement and educational outcomes of looked-after and previously looked-after children.

- Marsh House Studio's safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter- procedures, set up by the Local Multi Agency Safeguarding Board (LSCP). This includes working with Children's Social Care from other areas when children attend school in Luton however live outside of Luton.
- Marsh House Studio shares information with other practitioners in the interests of safeguarding children and young people in accordance with Working Together to Safeguard Children 2026, KCSIE 2026 and the statutory Information Sharing Duty guidance published in September 2026 (with the duty coming into force on 30 September 2026).
- they recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that clearly set out the processes and principles for sharing information within Marsh House Studio and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

information-sharing decisions will be informed by safeguarding risk. Staff will share relevant, necessary and proportionate information in a timely way and will not allow uncertainty about data protection to prevent appropriate safeguarding action.

- that Marsh House Studio staff be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether

this is when problems are first emerging, or where a child is already known to the local authority children's social care.

- they are aware that among other obligations, the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- relevant staff have due regard to the relevant data protection principles
- Marsh House Studio will follow local procedures for sharing intelligence in relation to Child Sexual Exploitation and Child Criminal Exploitation with Bedfordshire Police.
- Marsh House Studio initiates appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of their going missing in future
- the Director ensures that safeguarding policies and procedures which have been adopted by the Senior Leadership Team are consistently implemented
- Marsh House Studio has a staff behaviour policy (sometimes called the code of conduct) which should amongst other things include - staff/child relationships and communications including the use of social media and other online platforms, low level concerns.
- Marsh House Studio has procedures for managing **any** allegations and concerns about adults that work or volunteer with children, that **may** or **may not** meet the harm threshold and that these include the procedures for making referrals to the Disclosure and Barring Service and Teacher Regulation Agency where appropriate.
- **Marsh House Studio operates, "safer recruitment" procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with Keeping Children Safe in Education 2026**
- **the Designated Safeguarding Lead is a member of the Senior Leadership Team and has lead responsibility for safeguarding which is not delegated - this is clearly defined within the role holder's job description and that this person has the appropriate authority, time, training, funding and resources to undertake this role as per Appendix C Keeping Children Safe in Education 2026**
- the Designated Safeguarding Lead maintains management oversight of any work undertaken by the Deputy Designated Safeguarding Lead
- **any Deputy Designated Safeguarding Lead has the appropriate training skills and knowledge to undertake the operational function of the Designated Safeguarding Lead as per appendix C of Keeping Children Safe in Education 2026**

- the DSL and any Deputies undertake [Pan Bedfordshire Safeguarding Children Partnership's higher level training](#) to ensure they have the appropriate training, skills and knowledge to carry out this role.
- in addition, the Designated Safeguarding Lead and any Deputies will update their knowledge by receiving safeguarding updates via the designated safeguarding lead forums, attendance at training and learning events offered by the LSCP, online updates via NSPCC or attendance at professional development events
- **the Director and all other staff who work with children undertake safeguarding training in accordance with Keeping Children Safe in Education 2026 and that they receive annual safeguarding updates to ensure their continued professional development**
- all the Senior Leadership Team and staff receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at Marsh House Studio are effective and support the delivery of a robust whole provision approach to safeguarding. Their training should be regularly updated annually.
- training updates take account of LSCP priorities, the local context, the needs of the pupils and other identified training needs
- **all training will incorporate safeguarding children in specific circumstances which includes, but is not limited to: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and child-on-child abuse**
- **the training will ensure that child-on-child abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence - the training recognises how alcohol use, drug use, truanting and making or sharing nudes and semi-nudes, including digitally altered or AI-generated imagery increases risks of harm to children. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of Looked After Children**
- Marsh House Studio has appropriate safeguarding responses for children who go missing from education which should include holding more than one emergency contact number for pupils

- Marsh House Studio recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation
- temporary staff and volunteers are made aware of Marsh House Studio's procedures for child protection and their responsibilities
- Marsh House Studio remedies any deficiencies or weaknesses brought to its attention without delay and recognises the importance of utilising the expertise of the Designated Safeguarding Lead and Deputies in shaping safeguarding arrangements
- Marsh House Studio has appropriate filters and monitoring systems in place and regularly review their effectiveness.
- the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- The Senior Leadership Team should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks. Over blocking of material which could restrict children's online learning will be avoided.
- the curriculum is delivered in such a way to include educating children about how to stay safe which will include Relationship and Sex Education (RSE), online safety and broader safeguarding messages within PSCE
- children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- the child's/young person's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- the Senior Leadership Team reviews the policies/procedures annually
- a member of the Senior Leadership Team, usually the chair, is nominated to liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Director or member of the Senior Leadership Team

Appendix Three

Definitions and indicators of abuse

Abuse

Abuse is 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 in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Children/young people may be abused by an adult or adults or by another child(ren)/young person.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

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

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt

- often poorly or inappropriately clad for the weather
- poor school attendance or often late for school
- poor concentration
- affection or attention seeking behaviour
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is regularly not collected or received from school; or
- the child is left at home alone or with inappropriate carer.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

- multiple bruises in clusters, or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches
- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather
- fear of going home or parents being contacted

- fear of medical help
- fear of changing for PE
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying; or
- isolation from peers.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening. It may involve physical contact, including assault by penetration or non-penetrative acts, and may also include non-contact activities such as involving children in sexual imagery, encouraging sexual behaviour, grooming or abuse facilitated through technology.

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 act of sexual abuse, as can other children/young people.

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
- reluctance to go home
- 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
- reluctance to undress for PE or swimming; or
- bruises or scratches in the genital area.

Sexual exploitation

Child sexual exploitation occurs when a child or young person, or another person, receives 'something' (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children's social care. The significant indicators are:

- having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- entering and/or leaving vehicles driven by unknown adult
- possessing unexplained amounts of money, expensive clothes or other items
- frequenting areas known for risky activities
- being groomed or abused via the Internet and mobile technology; and
- having unexplained contact with hotels, taxi companies or fast food outlets.
- The Multi-Agency Information Submission Form will be used to share information with Bedfordshire Police that raises a concern around CSE and other forms of exploitation, etc.

[Preventing Child Sexual Exploitation | The Children's Society](#) is utilised by the school to support our approach to this area.

Emotional abuse

Emotional abuse may include verbal abuse such as persistent criticism, belittling or name-calling, as well as other behaviour that has a severe adverse effect on a child's emotional development.

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

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

- the child consistently describes him/herself 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
- behaviours such as rocking, banging head, regression, tics and twitches
- self-harming, drug or solvent abuse
- **fear of parents being contacted**
- **running away**
- **compulsive stealing**
- **appetite disorders - anorexia nervosa, bulimia; or**
- soiling, smearing faeces, enuresis.

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

Responses from parents

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

- delay in seeking treatment that is obviously needed
- unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- reluctance to give information or failure to mention other known relevant injuries
- frequent presentation of minor injuries
- a persistently negative attitude towards the child
- unrealistic expectations or constant complaints about the child
- alcohol misuse or other drug/substance misuse
- parents request removal of the child from home; or
- violence between adults in the household.

Disabled children/young people

When working with children with disabilities, practitioners need to be aware those additional vulnerabilities to abuse and neglect such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.

Possible indicators of abuse and/or neglect may also include:

- a bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- not getting enough help with feeding leading to malnourishment
- poor toileting
- lack of stimulation
- unjustified and/or excessive use of restraint
- rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- unwillingness to try to learn a child's means of communication
- ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting

- misappropriation of a child's finances; or
- inappropriate invasive procedures.

Dealing with a disclosure of abuse

When a child tells me about abuse s/he has suffered, what must I remember?

- stay calm
- do not communicate shock, anger or embarrassment
- reassure the child
- tell them you are pleased that they have spoken to you
- never enter into a pact of secrecy with the child
- assure them that you will try to help but let them know that you will have to tell other people in order to do this (state who this will be and why)
- tell them that you believe them
- children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed
- tell the child that it is not their fault
- encourage the child to talk but do not ask "leading questions" or press for information
- listen and remember
- check that you have understood correctly what the child is trying to tell you
- praise the child for telling you
- communicate that s/he has a right to be safe and protected
- do not tell the child that what s/he experienced is dirty, naughty or bad
- it is inappropriate to make any comments about the alleged offender
- be aware that the child may retract what s/he has told you. It is essential to record all you have heard
- at the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know
- as soon as you can afterwards, make a detailed record of the conversation using the child's own language – include any questions you may have asked
- Do not add any opinions or interpretations.

NB. It is not education staff's role to seek disclosures; their role is to observe that something may be wrong, ask about it, listen, be available and make time to talk.

The child/young person 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 DSL if they have concerns about a child/young person. It is important that staff determine how best to build trusted relationships with children/young people which facilitate communication

Immediately afterwards

You must not deal with this yourself. Clear indications or a disclosure of abuse must be reported to Children's Social Care without delay, by the Director or the Deputy Designated Safeguarding Lead.

Children/young people making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Lead.

Appendix Five

Allegations and concerns about staff, supply staff, trainee teachers, volunteers, contractors or other adults

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**

For example: the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling.

- **Emotional**

For example: intimidation; belittling; scapegoating; sarcasm; lack of respect for children's rights; excessive and/or aggressive shouting; and attitudes that discriminate on the grounds of race, gender, disability or sexuality.

- **Sexual**

For example: sexualised behaviour towards peers; sexual harassment; sexual communication including via social networking, email, text; grooming behavior; and sexual assault and rape.

- **Neglect**

For example: failing to act to protect a child or children, failing to seek medical attention or failure to meet a child's basic needs.

- **Behaviours which may pose a risk**

Some behaviours which may take place outside of the workplace could present a transferable risk in an employee's professional role working with or in the vicinity of children. For example, alleged perpetrator of domestic abuse, offences demonstrating a sexual interest in children, abuse or neglect of their own children or behaviours that are incompatible with a professional role working with children.

If a child makes an allegation or raises a concern about a member of staff (including supply staff), the Director and Deputy Safeguarding Lead should be informed immediately. If the allegation or concern falls within the following criteria, the LADO will be contacted at the earliest possible opportunity and within 1 working day:

- 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 in a way that indicates s/he may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The Director will not carry out the investigation him/herself or interview pupils.

If a child makes an allegation of physical abuse against an adult that works with children and there are visible bruises, marks or injuries, or if a child makes an allegation of sexual abuse against an adult that works with children, child protection procedures will be followed and a referral made to Children's Social Care. The LADO will also be informed.

The Director must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –

- If the actions of the member of staff are felt likely to fall within the scope of the Interagency Allegation Management Procedures (as stated in point 2), the Director will notify the Local Authority Designated Officer. The LADO will liaise with the Director and advise about actions to be taken which will be in accordance with the Interagency Allegation Management Procedures.
- If the Director is uncertain, whether the concern or allegation falls within the scope of the Interagency Allegation Management Procedures, a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.
- Where an allegation has been made against the Director, then the Deputy Safeguarding Lead takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of this specific procedure see the section on Allegations against Staff and Volunteers.

Concerns that do not meet the harm threshold.

Our Senior Leadership Team have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold.

We recognise that concerns may arise in several ways and from a number of sources, for example:

- suspicion;
- complaint;
- disclosure made by a child, parent or other adult within or outside of the organisation;
- as a result of vetting checks undertaken.

Marsh House Studio understand that the term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child/young person does not meet the threshold set out (as per KCSIE 2026, paragraph 430)

A low-level concern is any concern that an adult working in or on behalf of Marsh House Studio 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Marsh House Studio have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children/young people.

We understand that creating a culture in which **all** concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

As good practice our Marsh House Studio will:

- set out their low-level concerns policy within their staff code of conduct and safeguarding policies
 - ensure procedures are implemented effectively
 - ensure their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
 - empower staff to share any low-level safeguarding concerns with the Designated Safeguarding Lead (or a deputy)
 - address unprofessional behaviour and support the individual to correct it at an early stage
 - provide a responsive, sensitive and proportionate handling of such concerns when they are raised,
 - help identify any weakness in Marsh House Studio's safeguarding system.
- If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with Marsh House Studio's low-level concerns policy
 - Low-level concerns about a member of staff will be reported to the Designated Safeguarding Lead.
 - Where a low-level concern is raised about the Designated Safeguarding Lead, it will be shared with the Senior Leadership Team.
 - Where a low-level concern relates to a person employed by a supply agency or a contractor to work in Marsh House Studio, that concern will be shared with the Designated Safeguarding Lead, and recorded in accordance with Marsh House Studio's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.
 - All low-level concerns will be recorded in writing. The record will include:
 - details of the concern,
 - the context in which the concern arose,
 - action taken,
 - the name of the individual sharing their concerns will also be noted, however if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.
 - The Director will be the ultimate decision maker in respect of all low-level concerns and may consult with the DSL to take a more collaborative decision-making approach.

- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Where a pattern of such behaviour is identified, Marsh House Studio will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, be referred to the LADO.
- Low level concerns would not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it would be referred to in a reference.

Appendix Six

Indicators of vulnerability to radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as (KCSIE 2026):
Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
3. Extremism is defined by the Crown Prosecution Service as:
'The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - seek to provoke others to terrorist acts
 - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - foster hatred which might lead to inter-community violence in the UK.'
4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Children may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that Marsh House Studio's staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - identity crisis – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society
 - personal crisis – the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
 - personal circumstances – migration; local community tensions; and events affecting the child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - unmet aspirations – the child may have perceptions of injustice; a feeling of failure; rejection of civic life
 - experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration

- special educational need – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Appendix Seven

Safeguarding in Specific Circumstances: Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse. It's very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sexual intercourse, childbirth and mental health.

Effects of FGM

There are no health benefits to FGM, and it can cause serious harm, including:

- constant pain
- pain and/or difficulty having sex
- repeated infections, which can lead to infertility
- bleeding, cysts and abscesses
- problems passing urine or incontinence
- depression, flashbacks and self-harm
- problems during labour and childbirth, which can be life-threatening for mother and baby.

Some girls die from blood loss or infection as a direct result of the procedure.

Why FGM is carried out

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way (for example, as a preparation for marriage or to preserve her virginity).

However, there are no acceptable reasons that justify FGM. It's a harmful practice that isn't required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM.

FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it's carried out.

Where FGM is carried out

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays, as this allows more time for them to "heal" before they return to school.

Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM happening to them.

Communities at particular risk of FGM in the UK originate from:

Egypt	Yemen	Eritrea	Sudan	Oman
Ethiopia	Somalia	Gambia	Sierra Leone	Mali
Guinea	Nigeria	Indonesia	Saudi Arabia	Ivory Coast
Malaysia	Kenya	Iraqi Kurdistan	Liberia	

The law and FGM

FGM is illegal in the UK. It is a criminal offence to:

- perform FGM (including taking a child abroad for FGM)
- help a girl perform FGM on herself in or outside the UK
- help anyone perform FGM in the UK
- help anyone perform FGM outside the UK on a UK national or resident
- fail to protect a girl for whom you are responsible from FGM.

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

The Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) 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.

Possible signs and indicators of FGM

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help but may not be explicit about the problem due to embarrassment or fear.

Below are some warning signs that MAY indicate a girl is at risk of FGM:

- parents requesting additional periods of leave around school holiday times
- if the girl comes from a country with a high prevalence of FGM
- mother and siblings have undergone FGM
- child may indicate that they are going for a special event (in the UK or abroad).

Further information can be obtained from:

Appendix Eight

Safeguarding in specific circumstances: Making or sharing nudes or semi-nudes

Definition: “Making or sharing nudes or semi-nudes” means the creation, sending or posting of nude or semi-nude images by children under 18. Images include photographs, videos and livestreams and may be self-generated, taken by another person, digitally altered or wholly generated using artificial intelligence, including deepfakes or “deep nudes”.

Incidents covered by this policy:

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the sharing was consensual or non-consensual.

- person under 18 creates a sexual image of themselves and shares it with another person under 18
- a person under 18 shares an image of another under 18 with another person under 18 or an adult
- a person under 18 is in possession of sexual imagery created by another person under 18

Incidents not covered by this guidance:

- under 18s sharing adult pornography
- under 18s sharing sexual texts without sexual imagery
- adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)

The Law

Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The law also covers pseudo-images and computer-generated or manipulated sexual images that appear to depict a child, including images created or altered using AI or deepfake technology. Any such concern will be treated as a safeguarding matter and advice sought where necessary.

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe young people need education, support, and safeguarding, not criminalisation.

The National Police Chiefs Council has made clear that incidents of making or sharing nudes or semi-nudes should be treated primarily as a safeguarding issue. However, the police may need to be involved in cases to ensure thorough investigation including collection of evidence. If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or Children's Social Care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage, a decision has been made not to refer to police and/or Children's Social Care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery?

- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the young people involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

Informing parents/carers

Parents/carers should be informed and involved in the process at an early stage unless informing will put the young person at risk of harm. Any decision not to inform the parents/carers would generally be made in conjunction with other services such as Children's Social Care and/or the police, who would take the lead in deciding when the parents/carers should be informed. DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the young people to inform their parents/carers themselves.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should not intentionally view nude or semi-nude imagery unless there is a clear and exceptional safeguarding reason. Wherever possible, decisions should be based on what the DSL has been told about the content. Images must not be copied, printed, forwarded or stored by staff.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent/carer in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a Marsh House Studio's device or network.

If it is necessary to view the imagery, then the DSL should:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Deputy Safeguarding Lead
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Director

- ensure viewing takes place with another member of staff present in the room, ideally the Director or a member of the senior leadership team (this staff member does not need to view the images)
- wherever possible, ensure viewing takes place on Marsh House Studio's premises, ideally in the Director/Manager office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in Marsh House Studio's safeguarding records including who was present, why the image was viewed and any subsequent actions and ensure the safeguarding recording procedures for Marsh House Studio are followed.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Director can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the [DfE Searching, Screening and Confiscation advice](#) (note this advice is for schools only)

Appendix Nine

Safeguarding in Specific Circumstances: Gang involvement

There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include :

- becoming withdrawn from family
- sudden loss of interest in school - decline in attendance or academic achievement
- starting to use new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason

- sudden change in appearance - dressing in a particular style or 'uniform'
- dropping out of positive activities
- new nickname
- unexplained physical injuries
- graffiti style tags on possessions, school books, walls
- constantly talking about another young person who seems to have a lot of influence over them
- broken off with old friends and hanging around with a new group
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past
- being scared when entering certain areas
- being concerned by the presence of unknown youths in their neighbourhood

This is not an exhaustive list and should be used as a guide.

Appendix Ten

Safeguarding in Specific circumstances: Child Sexual Exploitation

Child sexual exploitation takes different forms - from a seemingly 'consensual' relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. Child sexual exploitation involves differing degrees of abusive activities, including coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. There is increasing concern about the role of technology in sexual abuse, including social networking, internet sites and mobile phones. The key issue in relation to child sexual exploitation is the imbalance of power within the 'relationship'. The perpetrator always has power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

Many children and young people are groomed into sexually exploitative relationships, but other forms of entry exist. Some young people are engaged in informal economies that

incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty. Some young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

Marsh House Studio recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation

The key indicators of child sexual exploitation include:

Health-

- physical symptoms (bruising suggestive of either physical or sexual assault)
- chronic fatigue
- recurring or multiple sexually transmitted infections
- pregnancy and/or seeking an abortion
- evidence of drug, alcohol or other substance misuse
- sexually risky behaviour

Education-

- truancy/disengagement with education or considerable change in performance at school.

Emotional and Behavioural Issues-

- volatile behaviour exhibiting an extreme array of mood swings or use of abusive language
- involvement in petty crime such as shoplifting, stealing etc.
- secretive behaviour
- entering or leaving vehicles driven by unknown adults
- reports of being seen in places known to be used for sexual exploitation, including public toilets known for 'cottaging' or adult venues (pubs and clubs)

Identity-

- low self-image

- low self-esteem
- self-harming behaviour, e.g. cutting, overdosing
- eating disorders
- promiscuity

Relationships-

- hostility in relationships with staff, family members as appropriate and significant others
- physical aggression
- placement breakdown
- reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation
- detachment from age-appropriate activities
- associating with other young people who are known to be sexually exploited
- known to be sexually active
- sexual relationship with a significantly older person, or younger person who is suspected of being abusive
- unexplained relationships with older adults
- possible inappropriate use of the Internet and forming relationships, particularly with adults, via the Internet
- phone calls, text messages or letters from unknown adults
- adults or older youths loitering outside the home
- persistently missing, staying out overnight or returning late with no plausible explanation
- returning after having been missing, looking well cared for in spite of having no known home base
- missing for long periods, with no known home base
- going missing and being found in areas where they have no known links

Please note: Whilst the focus is often on older men as perpetrators, younger men and women may also be involved and staff should be aware of this possibility.

Social Presentation-

- change in appearance

- going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people)

Family and Environmental Factors-

- history of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties

Housing -

- pattern of previous street homelessness;
- having keys to premises other than those known about

Income-

- possession of large amounts of money with no plausible explanation
- acquisition of expensive clothes, mobile phones or other possessions without plausible explanation
- accounts of social activities with no plausible explanation of the source of necessary funding

This list is not exhaustive.

Appendix Eleven

Information sharing is a safeguarding responsibility. Marsh House Studio will follow the statutory Information Sharing Duty guidance published in September 2026 (with the duty coming into force on 30 September 2026), Working Together to Safeguard Children 2026, KCSIE 2026 and current data protection law.

UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 do not prevent appropriate information sharing to safeguard children. Decisions will be necessary, proportionate, relevant, accurate, timely and secure and will take account of the risk of sharing and the risk of not sharing.

Where there is doubt, advice may be sought from the DSL, data protection lead, Children's Social Care or another appropriate professional, but uncertainty must not cause unsafe delay where a child may be at risk.

Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

This HM Government advice is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to children and young people and promotes their well-being.

This guidance does not deal with arrangements for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.'

Further guidance can be found at:

[Pan Bedfordshire Guide to Information Sharing](#)

[Information Sharing](#)

Appendix Twelve

Where a Channel referral is considered or made, Marsh House Studio will share relevant safeguarding information with the police and other Channel partners as appropriate and lawful.

Prevent Risk Assessment and Practice Action Plan – Marsh House Studio

	YES	NO	Existing Controls	Further Action	Staff responsible
Does the Safeguarding Policy make explicit that Marsh House Studio sees protection from radicalisation and extremist narratives as a safeguarding issue?	*		Imbedded into current Safeguarding Policy		Michael
Is the lead contact for Prevent responsibilities clearly identified in the policy?					
Designated Safeguarding Lead / Prevent Single Point of Contact SPOC	*		Staff are clearly identified throughout the safeguarding policy		Michael
Governor Safeguarding Lead					
Does SG policy make explicit how PREVENT concerns should be reported within Marsh House Studio?	*		Policy is clear on who concerns should be reported		
Fundamental British Values are considered in curriculum planning	*		Covered in induction, world music, tolerance and respect		
Thinking about an incident of radicalisation and/or extremism - Has the setting considered specific potential areas of risk such as;					
Processes in place to manage Subject Access Requests/Freedom of Information Requests should they be made?		*		To develop a process to manage Subject Access Requests/Freedom of Information Requests	Michael
The process in place for the management of information should there be media interest or if information requested into the community?		*		To develop a process to manage media interest	Michael
How will information be shared and with whom?	*		Information to be shared with professionals by DSL and Deputy, using secure methods, such as Egress		Michael Ross/Murphy
Does Marsh House Studio have clear guidance for visiting speakers?		*	No visiting speakers have taken place at Marsh House	checklist for any potential visiting speakers	Michael

Checks for external speakers to Marsh House Studio; Has the identity of the speaker been confirmed, and due diligence carried out? (Might consider checks on the internet to confirm the status of speaker and/or the organisation to include website, YouTube or social media sites.) Checks for premises use by externals?					
		*	No externals currently use our premises	This could change and we will develop a method of ways to carry out checks	Michael
Have ALL staff received appropriated training on PREVENT? Does this include support staff? Are there provisions for new staff induction? Have Governors received a PREVENT briefing? Do all staff know what to do if they have a PREVENT concern and to whom to report it?	*		Deborah Murphy and Michael ross has received prevent training in the last year.		
	N/A				
		*		Add in mandatory Prevent training within staff induction, to be carried out within their first week.	Michael
	*			Formally record Prevent questions within staff supervision	
Does the E-Safety Policy refer to the requirements of the Prevent guidance? Appropriate filtering is in place to ensure that staff and children are unable to access unauthorised or extremist websites online through school systems.		*		Currently using an acceptable use policy. This needs to be broadened and name changed to E-safety, must include prevent and up to date guidance from KCSIE	Michael

	*		Marsh House use Net nanny, which is a filtering system that can be customised and records websites visted and alerts staff if any restricted websites have tried to be accsessed		
Protocols are in place to manage the layout, access and use of any space provided for the purposes of prayer, contemplation and faith facilities			N/A		
Clear guidance on governing the display of materials internally at Marsh House Studio		*			

Appendix Thirteen

Operation Encompass information will be received by the DSL/Deputy DSL, recorded and handled as safeguarding information. It will inform appropriate support for the child and does not replace referral to Children's Social Care or police action where statutory thresholds are met.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children.

Operation Encompass connects the police with schools to enable that the appropriate support is in place for children who are subject to/witness incidents of domestic abuse. The school environment enabling rapid provision allows for appropriate safeguarding to be put in place against the short, medium and long-term effects of domestic abuse. Following an incident, children may arrive at school distressed, anxious or upset and Operation Encompass ensures that appropriate staff are aware early enough in order to support children in making them feel safe.

Please click [here](#) for more information.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

Appendix Fourteen - Searching procedures

Marsh House Studio will have due regard to the Department for Education guidance Searching, Screening and Confiscation. Any search will be carried out lawfully, proportionately and with regard to the learner's dignity, individual needs and safeguarding circumstances. Where a search

gives rise to a safeguarding concern, this will be reported promptly to the Designated Safeguarding Lead and managed in accordance with this policy.