

Workforce Training & Development Ltd

Safeguarding Policy

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

Date written: October 2021

Date of last update: January 2021

Date agreed and ratified by: Director: October 2021

Date of next full review: October 2021

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

Key Contacts

	Name	contact information
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What to do if you have a welfare concern

Why are you concerned?

For example

- Something a learner has said – e.g. allegation of harm
- Learner's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the company safeguarding procedure (contained in this policy)

- Reassure the learner
- Clarify concerns, using open questions if necessary (**TED**: Tell, Explain, Describe)
- Use learners own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL

Inform the Designated Safeguarding Lead

Designated Safeguarding Lead

- Consider whether the learner is at immediate risk of harm e.g. unsafe to go home
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult with Area Education Safeguarding Advisor.

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Learners and Parents:

- Follow company complaints procedures

Record decision making and action taken in the safeguarding log

Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support if necessary

At all stages, the learner's circumstances will be kept under review
The DSL/Staff will request further support if required to ensure the **learners safety is paramount**

1. Learner Focused Approach to Safeguarding

1.1 Introduction

- WTD recognises our statutory responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for learners and have an essential role to play in making this community safe and secure.
- WTD believe that the best interests of learners always come first. All children (defined as those up to the age of 18), young adults and vulnerable adults, have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Staff working with learners at WTD will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- WTD recognises the importance of providing an ethos and environment within WTD that will help learners to be safe and to feel safe. All learners are respected and are encouraged to talk openly. We will ensure learners wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
 - **Prevention**
 - positive, supportive, safe culture, curriculum and pastoral opportunities for learners, safer recruitment procedures.
 - **Protection**
 - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support**
 - for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
 - **Working with parents and other agencies**
 - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2021.

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2021 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
 - Keeping Children Safe in Education 2021 (KCSIE)
 - Working Together to Safeguard Children 2018 (WTSC)

- Ofsted: Education Inspection Framework' 2021
 - Prevent Duty 2011
- WTD acknowledges that as a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

1.3 Definition of Safeguarding

- In line with KCSIE 2021, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - protecting children from maltreatment
 - preventing 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, and
 - taking action to enable all children to have the best outcomes.
- WTD acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Children with family members in prison
 - Children Missing Education (CME)
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness
 - Human trafficking and modern slavery
 - Mental health
 - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
 - Online safety
 - Peer on peer abuse
 - Preventing radicalisation and extremism
 - Private fostering
 - Relationship abuse
 - Serious violence
 - Sexual violence and sexual harassment
 - So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
 - Upskirting

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2021)

1.4 Policy Compliance, Monitoring and Review

- WTD will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Annex A of KCSIE 2021 as appropriate.
- This policy is available to everyone on our website www.wtd.org.uk
- The policy will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

2. Key Responsibilities

2.1 Governance and Leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The governing body have regard to the KCSIE 2021 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The governing body and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and learners regarding any safeguarding and welfare concerns.
- The DSL will ensure that our safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.

2.2 Designated Safeguarding Lead (DSL)

- WTD has appointed Laura Faulkner, Finance Director, a member of the senior leadership team as the Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety). Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- WTD has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence.
 - Duncan Roberts - Governor
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2021. This includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns
 - Maintaining a confidential recording system for safeguarding and child protection concerns
 - Coordinating safeguarding action for individual children
 - When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
 - Liaising with other agencies and professionals in line with KCSIE 2021 and WTSC 2018.
 - Representing, or ensure that WTD is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
 - Managing and monitoring WTD's role in any multi-agency plan for a child.
 - Being available during working hours for staff to discuss any safeguarding concerns.
 - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and WTD leadership staff.
 - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours activities.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Informing the senior team of any significant safeguarding issues.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally every year, but their knowledge and skills will be updated through a variety of methods at regular intervals and when guidance is updated.

2.3 Members of Staff

- All members of staff have a responsibility to:
 - Provide a safe environment in which children/adults can learn.
 - Be aware of the indicators of abuse and neglect so that they can identify cases of learners who may need help or protection.
 - Know what to do if a learner tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a person.
 - Be able to identify and act upon indicators that learners are, or at risk of developing mental health issues.
 - Be prepared to identify learners who may benefit from early help.
 - Understand the early help process and their role in it.
 - Understand the company safeguarding policies and systems.
 - Undertake regular and appropriate training which is regularly updated.
 - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - Know how to maintain an appropriate level of confidentiality.
 - Reassure learners who report concerns that they are being taken seriously and that they will be supported and kept safe.

2.4 Children and Young People

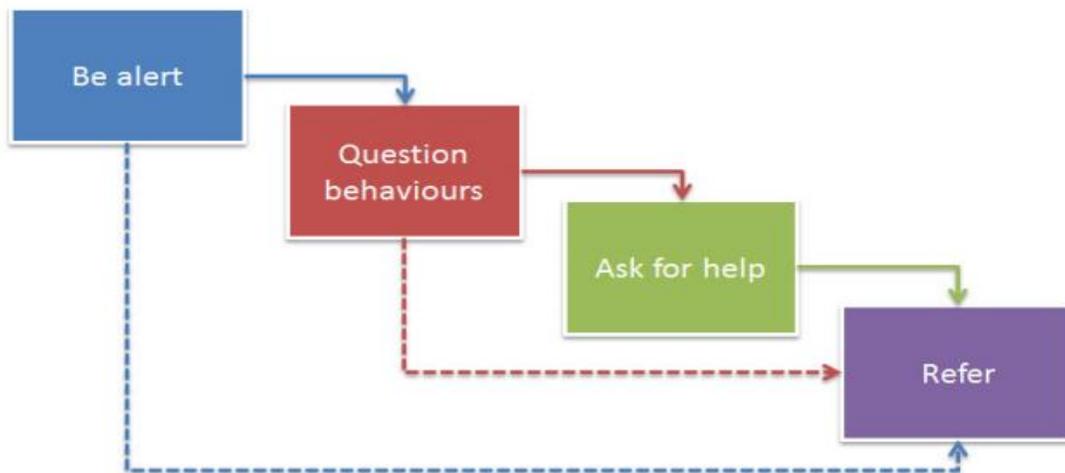
- Children and young people (learners) have a right to:
 - Feel safe, be listened to, and have their wishes and feelings taken into account.
 - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - Contribute to the development of WTD safeguarding policies.

- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

3. Child Protection Procedures

3.1 Recognising Indicators of Abuse and Neglect

- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021.
- WTD recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
 - For further information see Appendix 1.
- WTD recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- WTD recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Learners may report abuse happening to themselves, their peers or their family members. All reports made by learners to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the workplace. Learners can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the learner and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a learner:



[‘What to do if you are worried a child is being abused’](#) 2015

- In all cases, if staff are unsure, they will always speak to the DSL (or deputy).

3.2 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
 - listen carefully to the concern and be non-judgmental.
 - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children’s Services.
 - be clear about boundaries and how the report will be progressed.
 - record the concern in line with WTD record keeping requirements.
 - inform the DSL (or deputy), as soon as practically possible.
- The DSL or a deputy should always be available to discuss safeguarding concerns. In exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a ‘request for support’ will be made immediately to Integrated Children’s Services (via the ‘Front Door’) and/or the police
 - WTD recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to access guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
 - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children’s Services (ICS).

- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

3.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the WTD safeguarding report form and log and passed without delay to the DSL.
- Safeguarding report forms are available on the WTD dropbox folder.
- Records will be completed as soon as possible after the incident/event, using the learner's words and will be signed and dated by the member of staff. Records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Records will be kept confidential and stored securely. Records will be kept for individual learners and will be maintained separately from all other records relating to the learner in the. Records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

3.4 Multi-Agency Working

- WTD recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm.

3.5 Confidentiality and Information Sharing

- WTD recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2021.
- WTD has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that WTD is compliant with all matters relating to confidentiality and information sharing requirements.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the

need to safeguard and promote the welfare and protect the safety of children (KCSIE 2021). DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further detail.

- The DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to 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 learners; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a learner's safety or wellbeing.

3.6 Complaints

- All members of the WTD community should feel able to raise or report any concerns about learner's safety or potential failures in the WTD safeguarding regime. WTD has a complaints procedure available to learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the website www.wtd.org.uk
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at WTD will take all concerns reported to the company seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
 - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

- WTD is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, WTD leaders and staff who work directly with children will read annex B of KCSIE 2021 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Peer on Peer Abuse

- All members of staff at WTD recognise that children are capable of abusing their peers, and that it can happen both inside and outside of the workplace and online.
- WTD recognises that peer on peer abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying

- abuse in intimate personal relationships between peers
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals
- WTD believes that abuse is abuse and it will never be tolerated or dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
 - WTD recognises that even if there are no reported cases of peer on peer abuse, such abuse is still likely to be taking place.
 - All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
 - Concerns about learner's behaviour, including peer on peer abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
 - WTD want learners to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of peer on peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with WTD policies. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

4.2 Child on Child Sexual Violence or Harassment

- When responding to concerns relating to child on child sexual violence or harassment, WTD will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#) guidance.
- WTD recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured 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 sexual violence or sexual harassment or be made to feel ashamed for making a report.

- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.
- Reports will initially be managed internally by WTD and where necessary will be referred to Integrated Children's Services and/or the Police.
 - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or WTD staff, and, any other related issues or wider context.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

4.3 Nude and/or Semi-Nude Image Sharing by Children

- WTD recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and the local authority designated officer. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - All decisions and action taken will be recorded in line with our safeguarding procedures.
 - a referral will be made to ICS and/or the police immediately if:
 - the incident involves an adult (over 18).

- there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- WTD recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5 Serious Violence

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.
 - The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 So-called honour based abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy).
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
 - If a tutor, in the course of their work in the profession, suspects that an act of FGM appears to have been carried out on a girl under the age of 18, the tutor must report this to the police.
 -

4.7 Preventing radicalisation

- WTD is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- WTD recognises that children and young adults are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in learner’s behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow.

4.8 Cybercrime

- WTD recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

5. Supporting Children Potentially at Greater Risk of Harm

- Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

5.1 Children Requiring Mental Health Support

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children’s experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. WTD adopts an approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- WTD will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL.
- WTD identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - Contact: being subjected to harmful online interaction with other users. 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: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- WTD recognises that technology, and the risks and harms related to it, evolve and change rapidly. WTD will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our learners face.

6.1 Policies and Procedures

- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies.
 - Support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- WTD uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, and email systems.
 - All WTD owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- WTD recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2021 and understood by all members of the community.

6.2 Information Security and Access Management

- WTD is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in our GDPR and Privacy Policy.

- WTD will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.3 Staff Training

- WTD will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

6.4 Remote Learning

- WTD will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners will take place using provided or approved communication channels; for example, WTD provided email accounts and agreed systems e.g. Microsoft Teams or Onefile.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our enrolment paperwork and commitment statement.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

7. Staff Engagement and Expectations

7.1 Awareness, Induction and Training

- All members of staff have been provided with annex A of 'Keeping Children Safe in Education' 2021 which covers safeguarding information for staff.
 - WTD leaders, including the DSL will read KCSIE in its entirety.
 - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. **This is recorded in WTD's central compliance register.**
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding training (including online safety), including information to ensure they are aware of the WTD internal safeguarding processes, as part of their induction.
- All staff members (including agency and third-party staff) will receive appropriate safeguarding training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.
- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole WTD safeguarding approach and wider staff training and curriculum planning.
- In addition to specific safeguarding training, all staff will receive regular safeguarding and, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Staff will be encouraged to contribute to and shape WTD safeguarding arrangements policies.

- The DSL will maintain an up to date register of who has been trained.

7.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the WTD handbook.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the safeguarding policy and are aware of WTD's expectations regarding safe and professional practice.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant policies including staff behaviour policy, Acceptable Use Policies, and Social Media.

7.3 Supervision and Support

- The induction process will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a learner's safety or welfare.
- WTD will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of learners
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for learner's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish.

8. Safer Recruitment and Allegations

8.1 Safer Recruitment and Safeguarding Checks

- WTD is committed to ensure that we have a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
 - WTD will follow relevant guidance in Keeping Children Safe in Education 2021 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
 - The governing body and leadership team are responsible for ensuring that WTD follows safe recruitment processes as outlined within guidance.
 - The governing body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- WTD maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.

8.2 Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

- WTD will respond to allegations in line with the and [Part Four of KCSIE 2021](#). In depth information can be found within our Complaints Policy.
- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the WTD from potential false allegations or misunderstandings.
- Where leaders are unsure how to respond, for example if unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).

8.2.1 Concerns that meet the 'harm threshold'

- WTD recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in their workplace. This includes when someone has
 - behaved in a way that has harmed a child, or may have harmed a child and/or
 - possibly committed a criminal offence against or related to a child and/or;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be referred immediately to the DSL who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the DSL, staff are advised that allegations should be reported to the external governors who will contact the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- WTD may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- Where low-level concerns are reported to the DSL, the DSL will to share or liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, WTD will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

8.2.3 Safe Culture

- As part of our approach to safeguarding, WTD has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff handbook are constantly lived, monitored and reinforced by all staff and where all concerns are dealt with promptly and appropriately.

- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in WTD's safeguarding regime. The leadership team at WTD will take all concerns or allegations received seriously.
- All members of staff are made aware of the WTD Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- WTD has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at WTD, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#).

9. Opportunities to teach safeguarding

- WTD will ensure that learners are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Healthy Relationships.
- We recognise that WTD plays an essential role in helping learners to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- WTD recognises that a one size fits all approach may not be appropriate for all learners, and a more personalised or contextualised approach for more vulnerable people, victims of abuse might be needed.
- Our WTD systems support learners to talk to a range of staff. Learners will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

10. Local Support

- All members of staff at WTD are made aware of local support available.
 - **LADO Childrens Service**
 - Telephone: 01604 362993
 - Email: <http://ladoreferral@nctrust.co.uk/>
 - **Integrated Children's Services**
 - Front door: 03000 411111
 - Out of Hours Number: 03000 419191
 - **Northants Police**
 - 101 or 999 if there is an immediate risk of harm
 - **Safeguarding Adults Board Northamptonshire**
 - Tel: 01604 365681
 - Email: NSAB@northamptonshire.gov.uk
 - <http://www.northamptonshirescb.org.uk/health-professionals/taking-action/how-to-make-an-online-referral/>

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.

- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 a 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 involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

NSPCC ‘Report Abuse in Education’ Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

Support for Staff

- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women’s Aid: www.womensaid.org.uk
- Men’s Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It’s not okay: www.itsnotokay.co.uk

- NWG Network: www.nwgnetwork.org

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Peer on Peer abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>