

Safeguarding Policy

Introduction

The Safeguarding of staff, apprentices and learners at eTraining Ltd is the responsibility of all parties involved with the training provider. Safeguarding, along with the associated elements of Child Protection and the Prevent agenda are integral to all activities associated with the training provider whether on or off-site. Our objective is to ensure that all staff working for, or on behalf of eTraining, understand their responsibilities in relation to safeguarding those at risk and know who to escalate concerns to within eTraining.

Scope

It is essential that everybody working within eTraining understands their safeguarding and promoting the welfare of children's responsibilities. The policy applies to all members of staff or volunteers working directly with children and young people, and Adults at Risk. Staff who may not work directly with apprentices and learners must still be aware of the safeguarding policy and their own responsibilities to safeguard and promote the welfare of learners.

Where the policy or procedure refers to a 'child' or 'young person' we mean anyone who has not yet reached the age of 18 years. An adult at risk is someone aged 18 years or over 'who is or may need community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health, No Secrets, 2000). This policy is reviewed, endorsed, and approved by the senior leadership team annually, or when legislation changes.

This policy should be read in conjunction with the acceptable use of IT policy. By following this policy, we will help ensure that ICT facilities are used:

- legally.
- securely;
- safely
- without undermining tutors or bringing the company into disrepute;
- effectively;
- in a spirit of co-operation, trust, and consideration for others.

Principles

Promoting safeguarding is embedded throughout the organisation. Aspects included under the 'umbrella' of Safeguarding and for which the training provider has a responsibility in supporting all Apprentices and learners includes:

Keeping staff, apprentices, and learners safe within and outside of the training provider from:

- *Radicalisation*
- *Accidents*
- *Crime*
- *Bullying and harassment including cyber bullying*
- *Maltreatment*
- *Domestic violence and bullying*
- *Financial abuse*

- *Discrimination abuse*
Abuse – there are many categories of abuse and include areas such as physical, emotional, sexual and neglect in addition to these you must be aware of how to identify the signs of the abuse categories outlined in the 'Keeping Children Safe in Education' document and how to respond and report on them. This includes sharing nudes consensually and non-consensually.
- Content being exposed to illegal 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, including commercial advertising and adults posing as children).
- Conduct (Personal online harm – for example, making, sending, and receiving explicit images).
- Commerce (including online gambling and gaming).
- Child criminal and sexual exploitation and the differences between males and females. This includes non-contact activities, such as involving learners in the production of sexual images, forcing learners to look at them or grooming a learner in preparation for abuse, including via the internet.
- County line gangs and carrying knives
- Inappropriate peer on peer abuse including sexual harassment. Examples include (from a longer list including physical and sexual abuse), consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation/hazing-type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Protecting tutors /staff from allegations that are unsubstantiated, unfounded, false or malicious reports which differentiates between allegations that meet the reporting threshold and those under the threshold considered "low-level concerns. If the report is determined to be unsubstantiated, unfounded, false, or malicious, the designated safeguarding lead will consider whether the learner or person who has made the allegation needs help or may have been abused by someone else and this is a cry for help.
- Mental health issues and improving well-being.

To support staff, apprentices, and learners to keep themselves:

- *Healthy (including drugs/alcohol abuse, nutrition, exercise)*
- *Safe (Health and Safety, domestic violence)*
- *Cyber safe (mobile and Smart technology learners are made aware of the risks when using phones / Internet devices and what is and is not appropriate to share (sharing nudes). Learners receive a copy of the Learner Online Protocols for Keeping Safe (Appendix A), a Learner Handbook and a Learner Policy Handbook.*
- *Safe online (Apps, internet, text, photos, websites, safe from cyber bullying, grooming and radicalisation). Filters will be applied to search engines in line with recommendation from ESFA Prevent Lead & E-safety policy. Learners and staff receive a thorough Induction to make them aware of the online safety risks included in the latest safeguarding legislation.*

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- *Aware and informed of the child criminal and sexual exploitation risks and how this differs between males and females.*
- *Informed of strategies that county line gangs may use and awareness that learners may be vulnerable.*
- *Safe by acting against unsubstantiated reporting following eTraining disciplinary policy.*
- *Mentally well with tutors providing additional support to learners as required and weekly well-being / check in sessions for staff.*
- *Direct meetings with Lead prevent officer from ESFA, DofE to ensure correct procedures, training and support is given*

To ensure that staff, apprentices, and learners:

- *Feel safe whilst undertaking activities organised by the training provider*
- *Know how to report instances of bullying and harassment and that reporting procedures are clear*
- *Know how to report abuse including radicalisation and FGM*

To signpost apprentices and learners to relevant services to make informed decisions regarding:

- *Sexual health*
- *Diet*
- *Criminal activity*
- *Alcohol*
- *Drugs*
- *Relationships*
- *Hot topics*

To assist and raise awareness of staff in understanding, managing, and supporting:

- *Learners with Learning Difficulties and Disabilities (LLDD)*
- *Adults with Learning Difficulties and Disabilities (ALDD)*
- *Learners from ethnic minority backgrounds*
- *English for Speakers of Other Languages (ESOL) learners*
- *Students with Mental Health issues (e.g. depression, anxiety, self-harm, emotional issues)*
- *Children in Care (CIC), care leavers and young carers*
- *Young people seeking asylum*
- *Young Offenders/Rehabilitation of Offenders*

Apprentices and Learners with any of the Protected Characteristics:

- *Race*
- *Age*
- *Disability*
- *Sexual orientation*
- *Gender*
- *Gender reassignment*
- *Marriage and civil partnerships*
- *Pregnancy and maternity*
- *Religion and belief*

To ensure that staff, apprentices, and learners are fully aware of the requirements of:

- *Safeguarding and keeping themselves safe*
- *Child Protection (the reporting of abuse or neglect)*
- *Wider abuse categories of child sexual exploitation, bullying including cyber-bullying, sexual harassment, domestic violence, drugs, fabricated or induced illness, faith abuse, female genital mutilation, forced marriages, peer on peer abuse, gangs and youth violence, mental health, private fostering, radicalisation, nude sharing, teenage relationship abuse and trafficking*

These are to be achieved through:

- *An induction programme that provides an effective introduction to safeguarding and prevent for all apprentices and learners.*
- *An ongoing learning programme that embeds and reinforces all aspects of safeguarding and Prevent (Specific Discussion points and questioning)*
- *A staff induction programme that provides an effective introduction to safeguarding and Prevent*
- *A staff development programme that continually upskills staff in their understanding and application of safeguarding through all their activities.*
- *Annual updates for staff development to maintain a current understanding of safeguarding and the requirements relating to reporting and responding.*
- *An effective introduction for employers to ensure responsibilities are highlighted*
- *Policies and procedures that promote and reinforce safeguarding for staff and learners*
- *An area within SharePoint providing information for staff*
- *An area on the eTraining website providing information for learners*

Apprentice and Learner resources including information on:

- *Learner/apprentice safeguarding and Prevent*
- *Online Safety*
- *Respect*

Personnel Responsible for Safeguarding

Designated Safeguarding Lead – Tim Rowe

Deputy Designated Safeguarding Leads – Kirsty Hawkins

Training Provider Director – Tim Rowe

Safeguarding Training

There is a training provider requirement for all staff:

- *To undertake Safeguarding training, which includes Child Protection and Prevent at induction and annual mandatory updating (recorded on appraisal & CPD Record)*
- *To undertake Equality, Diversity, and Inclusion (EDI) training at induction and three yearly mandatory updating (monitored and recorded at appraisal)*
- *To undertake Prevent and Female Genital Mutilation (FGM) training annually (monitored and recorded at appraisal)*
- *To undertake additional training as required, in response to changes to policies or procedures and individual roles within the training provider*

Other training will include:

- *Managers to undertake nationally recognised training*
- *All staff involved in staff recruitment to undertake ‘Safer Recruitment’ training*
- *Designated Safeguarding Leads to update training as stipulated by current guidance*

All staff are required to ensure that they are familiar with training provider policies and procedures related to safeguarding and Prevent including:

- *Safeguarding strategy*
- *Child and Vulnerable Adults Protection*
- *Prevent*
- *Online Safety*
- *Harassment and Anti Bullying Policy*
- *Health and Safety*
- *Equality, Diversity, and Inclusion (EDI)*
- *Additional Learning Support*
- *Learner Disciplinary*
- *Employer Responsibility / Service Level Agreement*
- *Computer Use of Information and Learning Technology*
- *Learner Confidentiality and Data Protection*
- *Staff Code of Conduct*
- *Recruitment and Selection Procedures (incorporating Safer Recruitment)*
- *Confidential Reporting Code and Procedure (whistle-blowing) for the investigation of irregularities*
- *Lone Working*
- *Safeguarding Code of Conduct for Contractors, Visiting Trainers and Volunteers*
- *Visitors Protocol*
- *External Speakers*

Managers, Internal Quality Assurers (IQA), Tutor/Assessors and Trainers are responsible for knowing their learners and to identify if learners are at risk.

Managers and IQAs will support with the following additional responsibilities:

Learners at risk of not completing their programme are deemed to be 'at risk' – this does not infer a risk of physical danger but relates to being at risk of dropping out of their course or failing. Tutors should ensure that all parties involved in the learners' programme (e.g. Functional Skills etc.) are informed of the needs of the learner and appropriate strategies for managing those learners to maximise their opportunity for success.

Where staff are not clear of strategies for managing 'at risk' learners, it is their responsibility to seek support and to undertake appropriate training to address their skills need through the staff development programme or by reporting the training need to their line manager and/or Director.

Tutor/Assessor Responsibility

All staff are responsible for ensuring the safety and well-being of all learners and other staff members. However, Tutors/Assessors have a specific responsibility for the safeguarding of learners in their caseload. In line with their job role, they should ensure that:

They know their apprentices and learners through:

- *Examination of application, recruitment, and enrolment documentation*
- *Understanding of initial assessment*
- *Recognise behaviour and individual character traits*

They ensure that the following is in place in response to the above:

- *Recommendation for change of programme, if appropriate*
- *Additional Learning Support (Language, English, Maths)*
- *Signpost to external partners and services, as appropriate*

Apprentice/Learner Induction

All learners must have Safeguarding and Prevent included in their Induction Programme and be made aware of:

- *Training provider policies related to safeguarding and Prevent*
- *Their responsibility for their own and others' safety*
- *How to report any instances related to Safeguarding, Child Protection or radicalisation or contact with extremist groups*
- *Completion of initial safeguarding and prevent awareness at Induction.*
- *Guidance and support available to them.*
- *Information Sharing in respect of Children, Young People and Vulnerable Adults*
- *Guidance is available to support tutors in understanding issues around sharing information about young people and vulnerable adults*
- *All sharing of information must comply with the Data Protection Act/GDPA and Learner*

Confidentiality Policy

Employers and Partners

The procedure for employers/work placements must be followed for all learners to ensure that all workplace Health and Safety has been checked. Learners and employers/work placements must be familiar with the requirements of safeguarding at work training.

Employers/work placements are issued with the training provider guidance on Safeguarding and Child Protection. This ensures that eTraining maintains its commitment to safeguarding its learners when engaged in activities related to their training programme. The guidance outlines what is meant by Safeguarding, safeguarding measures that should be put in place and who to contact at the training provider regarding safeguarding or Child Protection concerns or questions.

In appropriate areas, where DBS checks are required, this is confirmed by the training provider and retained by the employer/work placement. Enhanced level checks are necessary for learners in specific areas and are carried out as needed.

All records must be stored securely and in accordance with General Data Protection Regulation (GDPR) 2018. It is good practice to keep concerns and referrals in a separate child protection file for each person. Files are only accessed by those who need to see it and where the file or content within it is shared, this happens in line [with information sharing advice for Safeguarding practitioners](#). This advice includes the seven golden rules for sharing information and considerations regarding the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK 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.

Records should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.
- Any records and chronology when referrals have been made as part of multi-agency working.

Safe Recruitment

eTraining has clear procedures which must be followed by all managers employing staff. These are outlined in the Safe Recruitment and Selection Policy and comply with the safeguarding statutory guidance outlined in Keeping Safe in Education. eTraining will undertake appropriate recruitment and vetting checks on individuals who are being considered for employment working with children, young people, and adults at risk. The process ensures compliance with guidance issued by the Department of Education, Ofsted, UK employment legislation and appropriate professional bodies.

Contractors, Volunteers and Returning Learners

In the case of these groups, the training provider will make judgements of risk when offering contracts. The individual making these arrangements is responsible for ensuring that in the of:

- *Contractors – the employers have undertaken appropriate checks on its own staff and that they are fully aware of the Code of Conduct for Contractors.*

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- *Visiting Trainers/Volunteers – must be accompanied from the reception area to the place of activity. Visiting trainers should not be left unaccompanied with learners at any time unless in the areas of the building open to the general public. Refer to the Code of Conduct for Visiting/Sessional Trainers and the Visitors Policy.*
- *For the purposes of safeguarding, Volunteers should be treated as employees and must be DBS checked and a reference obtained.*
- *Returning learners (alumni) must sign in as a visitor and be accompanied as per the Visitor Policy.*

Induction of Staff

All staff undergo an induction programme co-ordinated centrally. All staff are required to undertake Safeguarding, Prevent and equality, diversity, and inclusion training as part of their induction programme. It is the responsibility of the line manager of every new member of staff to confirm completion of this training prior to confirming their appointment at the end of their probationary period.

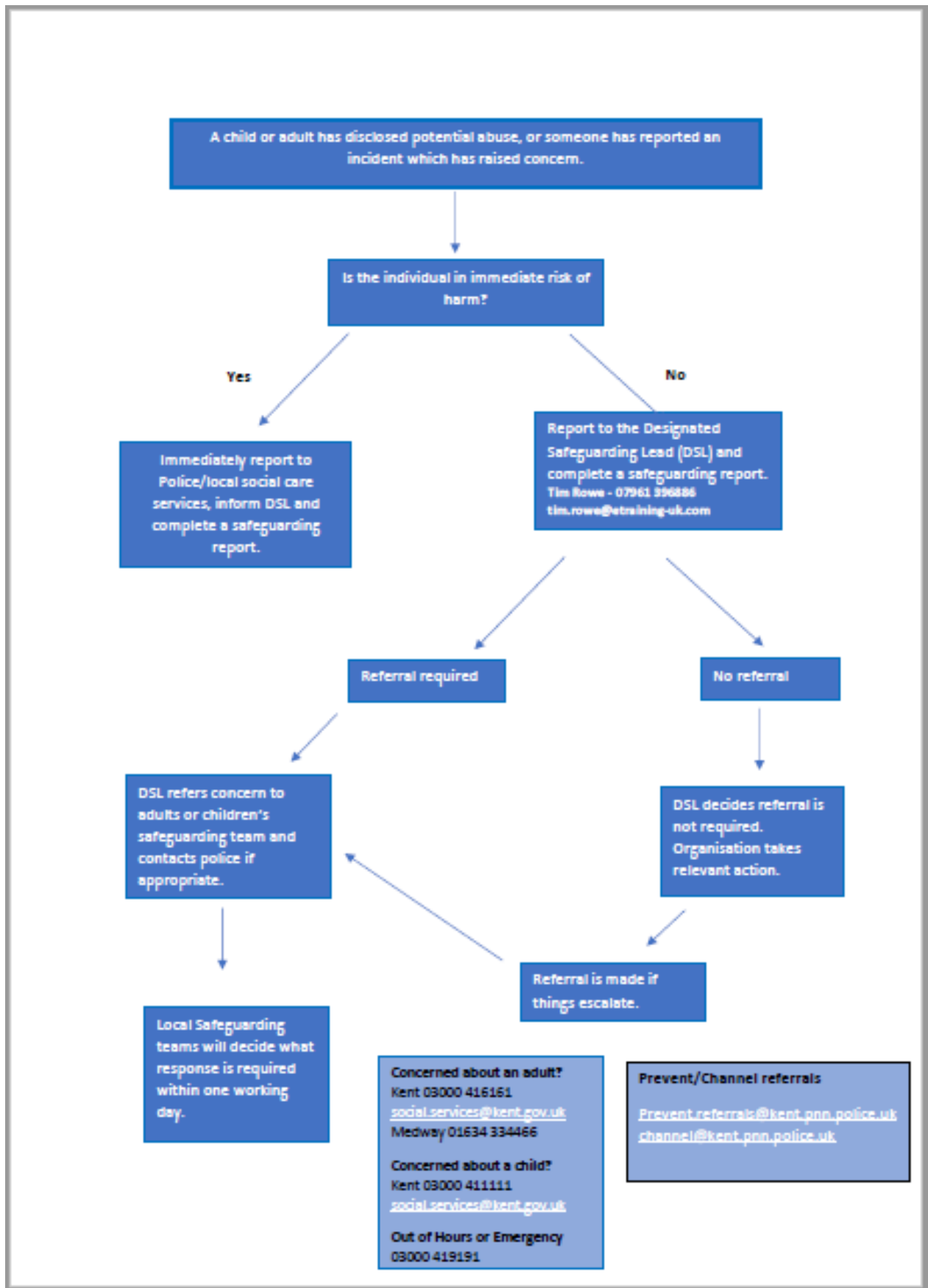
Responding to Safeguarding Disclosure and or Suspicion

Where a learner at risk discloses or discusses potential abuse or harm the staff member should be able to; Recognise, Respond, Reassure, Record and Report.

Safeguarding concerns should be reported to a Designated Safeguarding Lead. Examples of a safeguarding concern (but not exhaustive): if abuse is suspected or if a disclosure is made by a learner. We will work in partnership with other agencies to ensure that concerns or allegations of abuse are appropriately referred for investigation to the most appropriate agency.

If the concern regards radicalisation a report should be made to a Designated Safeguarding Lead.

Reporting a Concern Flow Chart



Procedure for Dealing with Concerns

eTraining staff who have regular contact with learners are well placed to observe significant changes in learner's behaviour, a failure to thrive, outward signs of abuse or behaviour which may indicate a risk of being drawn into terrorism or other concerns. In addition, learners may choose to share their concerns with staff they feel they can trust and with whom they are comfortable. Staff need to know how to respond sensitively to a learner concern and who to approach for advice.

Whilst staff are not responsible for investigating abuse it is essential that any suspicions of significant harm, allegations of abuse, or concerns over potential radicalisation, are acted on, and treated seriously.

eTraining takes a holistic view of the welfare of its learners and recognises that a wide range of contextual factors may be impacting on the wellbeing of a young person or adult at risk. These are likely to include family circumstances, friendship groups, the presence of specific vulnerabilities, attendance and behaviour and learning differences. The safeguarding officer will consider the full picture in dealing with cases brought to their attention.

The following guidelines should be followed by staff:

- *Stay calm and reassure the young person that they are right to tell someone of their concerns.*
- *Do not promise confidentiality. Be honest. Explain whom you need to pass the information on and why (i.e., the appropriate person at eTraining who will seek further advice and help.) The learner can accompany you if they wish. Only the people who need to know will be told.*
- *Allow the learner to speak in their own way and at their own pace, avoid interrupting when they are recalling significant events.*
- *Do not be judgemental but make a professional assessment about the likelihood of harm occurring.*
- *Do not 'interview' the learner, do not ask leading questions. Factual questions are permitted to gather as much information as possible to create a full picture of what has happened so that this can be reported to the designated safeguarding lead.*
- *Only clarify what the learner is trying to say and ascertain whether there are any immediate issues of safety for them or others.*
- *Note as accurately as possible what was said, use the learner's own words and do not interpret what they are saying. Include the time, context, and location of the disclosure. Date and sign the notes. In addition to the learners add the address, date of birth, telephone contact.*
- *Do not investigate any suspicions, allegations, or incidents of abuse, but report them within the hour (or as soon as practicable) to the designated safeguarding lead and pass on all written notes.*
- *The Designated Safeguarding Lead who will then contact the local authority Children's and/or Adults Services, local Prevent Coordinator, or other agencies as appropriate.*
- *Where there is a concern that a learner is experiencing, may already have experienced abuse or neglect, is suffering or is likely to suffer 'significant harm' the Designated Safeguarding Lead will refer immediately to Children's/ Adults Services at the appropriate local authority.*
- *Where there is concern of a real threat to life emergency services must be contacted immediately.*

- *In exceptional circumstances if the Designated Safeguarding Leads are not available advice should be sought from the Deputy safeguarding lead a member of the Senior Leadership Team, who will liaise with the required services as appropriate.*

Dealing with allegations of misconduct against staff under Safeguarding and Child Protection

All allegations must be reported to a Designated Safeguarding Lead as soon as a member of staff is aware of an allegation. eTraining has a legal duty to report concerns within one working day to the Local Authority Designated Officer

The member of staff may be suspended if it is considered that they or anyone else is at risk, or if there is good reason to believe the continued attendance of the member of staff cannot be permitted.

Where an allegation has been made against a member of staff, the Designated Safeguarding Lead should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of eTrainings procedures and/or policies. Consideration should also be given to the training needs of staff.

Data Management

The implementation of this policy requires the processing of personal and sensitive data of learners and/or members of staff. This will be done in accordance with the terms of Data Protection legislation as amended by the General Data Protection Regulations (2018) (GDPR) and as set out and interpreted in eTrainings data management, storage, retention and disposal policies and related statements. The main requirements under the current legislation and policy are as follows:

- *Data subjects will be informed what data is being collected and for what purposes*
- *Data will be stored safely and securely with robust access arrangements in place*
- *Consent to share data will be requested where/when this is necessary*
- *Data will only be shared on a need-to-know basis and using secure transfer mechanisms*
- *Data will not be retained for any longer than is necessary*
- *Digital and hard copy data will be securely destroyed when it is no longer needed, or the retention period has expired*

Policy Review

The effectiveness of this policy will be kept under continuous review in the light of experience and best practice. This will involve consultation with staff, managers, learners when appropriate and the Safeguarding Officers.

The Policy will be subject to annual approval by the Safeguarding Officers or as required should substantive changes be proposed in-year.

More Information and Accessing Support

Designated Safeguarding Lead: Tim Rowe 07961 396886

Deputy Safeguarding Officers: Kirsty Hawkins 07894746706

Office number: 0800 3288331

Out of normal working hours: 07961 396886

Safeguarding & Prevent Duty Links, Guidance & Additional Support

Kent Police 0800 789 321 / 101 / 999

National Counter Terrorism Security Office - Hotline number 0800789321

Prevent/Channel Referrals - prevent.referrals@kent.pnn.police.uk

Prevent Lead Kent County Council- Nick Wilkinson - 03000 41 41 41

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Kent Safeguarding Children's Board - <https://www.kscb.org.uk/guidance/extremism-and-radicalisation2>

Kent County Council Social Care Referrals – Social.services@kent.go.uk

Children's safeguarding 03000 411111

Adults safeguarding Kent 03000 416161, Medway 01634 334466

(Kent & Medway Out of Hours) 03000 419191

Prevent KCC - <https://www.kent.gov.uk/about-the-council/strategies-and-policies/community-safety-and-crime-policies/contest/prevent>

Local Authority Designated Officer (LADO)

If you have concerns about a member of staff and need to contact the Local Authority Designated Officer (LADO) you can do so using the following contact number 03000 41 08 88. The LADO may also be contacted by using the following email address

kentchildrenslado@kent.gov.uk.

Current practice guidelines for Kent are available here: [Managing Allegations Against Staff Practice Guidance](#):

[Kent LADO Referral Forms are available here:](#)

Kent LADO Referral Form for Professionals

Kent LADO Referral Form for Parents and Carers

For further guidance please use the links below:

[Keeping Children Safe in Education 2021](#)

[Disqualification Guidance 2015 \(PDF, 731.1 KB\)](#)

[Fostering \(KCC\)- Allegations & Complaints Against Foster Carers \(PDF, 128.9 KB\)](#)

[AMA Wider Workforce Guidance on Safe Working Practice \(PDF, 326.6 KB\)](#)

[KATO - for Support and Training and Information. Courses offered by Certified Providers and endorsed by KATO, Information to support on measures that should be in place, updates on legislation.](#)

AELP Association of Employment and Learning Providers

<https://www.aelp.org.uk/search?term=prevent> 0117 986 5389

Access to training, advice and guidance surrounding Training and Documentation needed for Prevent/Safeguarding

Government Links to Guidance for FE Providers

<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>

www.gov.uk/government/publications/the-prevent-duty-in-further-education-and-skills-providers

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Education & Training Foundation – Guidance information & Training support 020 3740

8280 regular speakers at KATO

www.preventforfeandtraining.org.uk/home/practitioners/guidance-materials/

Signed:



Name: Tim Rowe

Position: Director

Date: 01/11/2021

Next review date: Nov 2022

Appendix A

Protocols for Learners when learning online

Tutors will be going through how to safeguard learners online during the induction process. The protocols devised below have been produced in conjunction with the eTraining Safeguarding Policy, Acceptable Use of Computers, Internet and Email Policy and the Harassment and Anti-Bullying Policy.

1. To protect all learners, we ask that learners are appropriately dressed and ready to learn when logging onto lessons using Zoom or other eLearning platforms.
2. To help us to ensure our learners safety online learners, wherever possible, are requested to turn on their cameras and to use them during the scheduled lessons or break out rooms. If learners are learning online and have the option available to change their background on the screen for privacy, we encourage learners to do so.
3. We will contact learners if they are unable to attend classes including online lessons so that we can follow up appropriately and make sure that safeguarding procedures are followed. eTraining will provide you with our contact details when you enrol.
4. Learners must inform their Tutor if they are struggling to meet deadlines so that eTraining is able to support them to try and meet requests.
5. eTraining will work with and will support the learners by providing support and reviews which will be scheduled as part of the working week. This is to ensure that learners have the time and confidential space with their Tutor to review their needs to further support them.
6. When learners log in onto the eTraining eLearning platform on or off the premises they will need to read and agree to the agreement pre-set by the relevant eLearning platform.
7. We ask learners not to disclose their locations online and to not give away too many personal details.
8. Learners need to keep password log ins safe and not to disclose these to anyone else.
9. Learners should ensure that Bluetooth is turned off on their mobile phone while they are engaged in lessons.
10. Learners are not to take photos of others while engaged in learning including using photos online in any context.
11. To protect learners, we ask for lanyards to be visibly worn when on site and visible when attending online classes.
12. Learners are to report bullying online or that takes place within their learning programme. Tutors are to follow the Harassment and Anti-Bullying Policy in this regard to ensure that all learners feel safe.
13. Learners are made aware at the time of enrolment that they will need use of a laptop or work computer. The e-portfolio systems also work with mobile phones and iPads.

14. Learners with any concerns or who feel worried should refer to the Designated Safeguarding Lead or Deputy.
15. Learners are to be aware that the safe use of ICT is monitored on and off site for all learners' safety.

Appendix B

Further information Annex B contains important additional information about specific forms of abuse and safeguarding issues. Leaders and those staff who work directly with children should read this annex.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money, or new possessions.
- associate with other children involved in exploitation.
- suffer from changes in emotional well-being.
- misuse drugs and alcohol.
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education

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

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

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

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

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes, and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g., knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity.
- owe a ‘debt bond’ to their exploiters.
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

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). 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'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Children with 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 a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where 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. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. 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. Experiencing 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. Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer 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. The Act's provisions, including the new definition, will be commenced over the coming months.

Homelessness

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) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, 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 social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#).

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage) So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate

local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach.

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#). Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.¹²⁹ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet. Further information can be found in the multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit (FMU) has created: multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdof.gov.uk

Preventing radicalisation

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

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alerted to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are

vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. Statutory guidance on Channel is available at: Channel guidance.

Peer on peer/ child on child abuse

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; 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; up skirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. Staff should be aware of the importance of:

- challenging inappropriate behaviours.
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act as described below: Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents. Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent:

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16.
- sexual intercourse without consent is rape.