



Safeguarding Children Policy and Procedures

AREA	GOVERNANCE
AUDIENCE	ALL INTERNAL STAKEHOLDERS (Staff, Trustees and Volunteers)
REVIEW FREQUENCY	Annually
LAST REVIEW MONTH	MARCH 2022
NEXT REVIEW MONTH	MARCH 2023
OWNED & REVIEWED BY	SHORT BREAK MANAGER
APPROVED BY	Designated Safeguarding Trustee

1. Policy Overview

Introduction

- 1.1 UET takes seriously its responsibility to protect and safeguard the welfare of the children, in its care. Our staff, volunteers and Trustees are committed to safeguarding the children they meet through their involvement with UET. All adults working or volunteering in our organisation maintain an attitude of 'it could happen here'.
- 1.2 This policy and set of procedures work in line with the following legislation and statutory and non-statutory guidance, which should be read in conjunction with the policy:
- The Care Act 2014
 - Working Together to Safeguard Children and Young People 2018
 - Keeping Children Safe in Education – Sept 2021
 - Sexual violence and sexual harassment between children in schools and colleges (Sept 2021)
 - What to do if you are worried a child is being abused (March 2015)
 - The Prevent Duty – department advice for schools and childcare providers (June 2015)
 - Multi-agency statutory guidance on Female Genital Mutilation (FGM) (July 2020)
 - Information-sharing – advice for practitioners providing safeguarding services (July 2018)

Definitions

1.3 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.

1.4 Children: those aged under 18 years.

Scope

1.5 This policy and set of procedures applies to all UET staff, volunteers, work experience placements and Trustees. Safeguarding is the responsibility of everyone.

1.6 The policy also applies to working arrangements with other agencies to support UET's Safeguarding Children at Risk Policy, including local education authorities, schools, support agencies, sub-contractors, and employers.

Intent

1.7 The intent of the policy and procedures is to ensure that:

- a safe environment is provided at UET for children, including ensuring children are kept safe online
- appropriate action is taken to protect children who are suffering or at risk of suffering harm, including emotional, physical, sexual abuse and neglect, either in the real world or online.
- information is shared appropriately with multi-agency professionals and in line with the guidance referenced on page 1.
- each setting within UET has a designated safeguarding lead and at least one deputy DSL who complete additional safeguarding training in line with the local Safeguarding Partnership requirements (<https://safeguardingpartnership.swindon.gov.uk/info/4/training/11/training/9>)
- safe recruitment practices exist when checking the suitability of staff, Trustees, and volunteers to work/volunteer with children
- regular safeguarding training is completed by all staff, regular volunteers and Trustees, which enables everyone to recognise the signs and indicators of abuse and the appropriate action to take in line with UET procedures and with the guidance listed on page 1
- allegations procedures are in place and staff, volunteers and Trustees know the steps to follow if they have safeguarding concerns about the behaviour /action of an adult who is working/volunteering with children

Quick Reference Contacts Guide

	Name	Contact Number
Designated Safeguarding Lead	Short Break Manager	07394558591
Deputy DSL	Short Break Lead	07712513557
Deputy DSL	Fiona Clark	07825619567
Designated Person for Children Looked After	Short Break Manager	07394558591

Early Help/ CAF Team /Hub	Contact Number
Jane Griffins	01793 466479

Children's Social Care (MASH)	01793 466903
Emergency Duty Service	01793 436699

	Name	Contact Number
Provision Manager		07394558591
Chair of Trustee	Derek Dinsey	Can be reached via the clerk of UET 07771195038 carterm@brunelsenmat.org.uk
Safeguarding Link Trustee	Jeff Smith	Can be reached via the clerk of UET 07771195038 carterm@brunelsenmat.org.uk
Chief Executive Officer (if part of a Trust/Federation)	Jackie Smith	07827296667
Local Authority Designated Officer / Designated Officer For Allegations	Swindon	07392 103019 (Mon-Weds) 07824081177 (Thurs/Fri)

Police	101 /999
NSPCC Whistle-blowing Helpline	0800 028 0285

2. Roles and Responsibilities

Staff

2.1 It is the responsibility of all staff working within UET to report and record concerns regarding the safeguarding of vulnerable children to a member of the UET safeguarding team and work in line with the procedures included within this policy.

The Safeguarding Team

Designated Safeguard Lead	Deputy Designated Safeguard Lead	Deputy Designated Safeguard Lead
Short Breaks Provision Manager	Short Break Lead	Fiona Clark Assistant Director of Education
07394 558591	07712513557	07825 619567

In the absence of the safeguarding team staff should contact Jackie Smith 01793 493910

Designated Safeguarding Lead (DSL):

2.2 The DSL and deputy DSLs complete multi agency safeguarding and child protection training every 2 years. In addition, the DSL and deputy DSLs have a duty to keep updated with the relevant national and local statutory requirements and guidance, at least annually. This is completed by reading newsletters, attendance at events and briefings and keeping up to date with national guidance.

2.3 The DSL is responsible for:

- overseeing the referral of suspected abuse or allegations to the relevant investigating agencies in line with the procedures of the Children and Family Services of the relevant LA
- meeting with the Deputy DSLs regularly to moderate case management and ensure that decision-making is in line with agreed policy and procedures
- offering advice and support to staff on issues relating safeguarding and child protection
- ensuring the maintenance of safeguarding records of any child
- ensuring that all families of individuals who access UET who may be vulnerable are aware of what to expect in the way of support from UET and how to access this support
- ensuring that parents and carers of children within the UET are aware of the UET's Safeguarding Children at Risk Policy
- liaising with LA Services, Local Safeguarding Partnerships, and other appropriate agencies
- ensuring appropriate liaison arrangements are in place with schools whose pupils attend UET settings

- ensuring staff receive initial safeguarding training as part of their induction and are aware of this policy

The Designated Safeguarding Trustee:

2.4 The designated Safeguarding Trustee is responsible for liaising with the DSL over matters regarding safeguarding, including:

- ensuring that UET has procedures and policies which are consistent with the Local Safeguarding Partnership and Children procedures
- ensuring that the Trustees review the Safeguarding Children at Risk Policy each year and that it is fit for purpose
- ensuring that each year the Trustees are informed of how UET and its staff have complied with the policy, including, but not limited to, a report on the training that staff have undertaken

2.5 It should be noted here that the Designated Safeguarding Trustee should not be involved directly with individual case management.

Board of Trustees

2.6 The Board of Trustees are committed to ensuring that UET:

- promotes and provides a safe environment for all children
- identifies children who are suffering, or likely to suffer, significant harm
- takes reasonable action to ensure the welfare and safety of children
- raises awareness of issues relating to the welfare of children and the promotion of a safe environment for them on UET sites
- has robust procedures in place for reporting and responding to allegations of abuse made against adults who work or volunteer in a position of trust in UET
- has robust safer recruitment procedures in place to ensure staff and regular volunteers are suitable to work with children

3. ACTION WHEN A CHILD HAS SUFFERED OR IS LIKELY TO SUFFER HARM

Process

Reporting /Recording concerns

An individual with concerns about a child should report directly to the DSL or the Deputy DSLs (if both the DSL and Deputy DSLs are unavailable, then concerns need to be shared with Jackie Smith – Chief Executive Officer (CEO) as soon as possible. **The individual with concerns may refer to children’s social care directly (see below for contact details). The concerns must also be recorded on the UET concern form (see appendix C)**



Consideration

The DSL will consider the information, in the context of any other concerns/disclosures, and decide on next steps. Where possible this should be done in consultation with others in the safeguarding team.

Parents/carers should be involved at this stage, **unless to do so may place the child at increased risk of significant harm, in which case advice should be sought from Multi Agency Safeguarding Hub (MASH)**



Referral to Children’s Social Care

The DSL will make a telephone referral in the first instance to:-

- Swindon MASH 466903

Emergency duty service 436699 or

- Wiltshire MASH 0300 4560108

Emergency duty service 0845 6070 888

depending on the home address of the child or young person

This must be followed up within 24 hours with a written referral.

If the child is also attending school the DSL at the school will be alerted of the referral and a copy sent.

No Referral to Children’s Social Care

Actions will be agreed to monitor the child/ young person and support the child/young person and family where needed.

An Early Help Record and Plan should also be considered at this stage.

If the child is also attending school, the DSL at the school will be contacted to agree next steps.



Children’s Social Care Consideration

Children’s social care decides within 1 working day what action will be taken, including if an assessment is needed and **feedback to the referrer.**



Assessment

Children’s social care completes the assessment within 45 working days of the referral; it could be a section 17 or section 47 assessment. UET should allow LAs access to facilitate arrangements.

No Assessment

If the information supplied in the referral does not meet the threshold, an Early Help Record and Plan (EHRP) may be recommended and/or onward referral to other specialist or universal services; **children’s social care will feedback to the referrer.**

Again, if the child is attending school next steps will be discussed with the DSL at the child’s school.



If the child’s situation does not appear to be improving the referrer should press for re-consideration.

4. Procedure for Reporting Concerns

- 4.1 All staff have a responsibility to keep children safe and to protect them from abuse - sexual, physical, emotional abuse and neglect.
- 4.2 If an individual has concerns about the welfare or safety of a child must **follow the guidance included on pages 7-9**. Action must be taken in a timely manner and an individual must not delay reporting their concerns to the safeguarding team.
- 4.3 To support with identifying possible abuse and neglect Appendix A lists some of the signs and indicators of abuse.
- 4.4 Appendix B provides the definitions of the four categories of abuse.
- 4.5 Staff/volunteers may be worried about a child because of something they have seen, heard or noticed. Where a child comes to speak to a member of staff or volunteer directly and shares information of concern, which may suggest they or another child is at risk, this is known as a disclosure.
- 4.6 If a child discloses to a member of staff or volunteer, they should:
 - listen carefully and stay calm
 - allow the child talk freely without interrupting
 - only ask questions if needed to clarify, staff and volunteers should take care not to put words in the child's mouth by asking leading questions
 - reassure the individual that by telling someone about their worries they have done the right thing. Staff and volunteers should not make promises about keeping the information a secret
 - note the main points carefully and note the exact words used if possible
 - report the issue as a matter of urgency to a member of the Safeguarding Team
- 4.7 Members of the safeguarding team responding to reports should consider the following:
 - In the case of a child, who has difficulty in communicating, an experienced and appropriate member of staff could be asked to support or advocate for the individual
 - In the case of a child living in care, it should be recognised that their home or day care provider may be implicated in an allegation of abuse. In view of this, if it is judged that there is significant risk to the immediate safety of the individual from the home or provider, the DSL/DDSL should inform the relevant authorities, including the police before contacting the carers.
 - Once a report has been made to one of the Safeguarding Team members, they will take on responsibility for ensuring that the case is handled in line with policy, procedures, and good practice. Any further information that comes to light, or any further incidents, should be reported to the team member concerned without delay

Record Keeping

- 4.8 Any staff or volunteer receiving a disclosure of abuse, or noticing possible abuse, must:
 - make an accurate record in pen as soon as possible; noting what was said in the child's own words or concerns seen, putting the event into context, and giving the full date, time, and location. Where possible this should be recorded on the Safeguarding and Child Protection Disclosure/Concern/Incident Form (See Appendix C). The record should be handed in person to a member of the safeguarding team as soon as possible. Copies of records should not be left in

pigeonholes or on desks. The information included on the record is confidential and should be treated so

- record any observed injuries to a child, on a body map outline, with some indication given about the size, colour, shape, and condition of the injury. Staff should not take photographs of injuries
- report the concerns to a member of the safeguarding team as soon as possible and in a timely manner
- retain all hand-written notes, even if they are subsequently written up onto a concern form.
- Not keep copies of completed concern forms or notes, the original record should be handed to the safeguarding team

5. Storage and retention of safeguarding records

- 5.1 All records relating to safeguarding concerns will be kept in a secure place and will remain confidential. There is restricted access to these records. They do not form part of the child records and must be kept separate from other records.
- 5.2 The safeguarding team are responsible for maintaining a chronology at the front of the child individual file, which will be reviewed and updated whenever a new concern is raised or additional relevant information becomes available, noting actions and outcomes.
- 5.3 The quality of safeguarding records will be monitored by the Short Break Manager.
- 5.4 Where a child moves placement, the original safeguarding documentation must be passed immediately and confidentially to the receiving provision, separate from general records, UET should not keep either the originals or copies of this documentation. The DSL will also telephone the DSL at the new placement to raise awareness of safeguarding concerns, and that records are being transferred.
- 5.5 Where there is no subsequent placement or provision, the UET will hold retain safeguarding records securely until the CYP reaches the age of 25.

6. Parental Involvement

- 6.1 UET is committed to helping parents/carers understand responsibility for the welfare of all children who are in our duty of care. UET's priority is the child's welfare and therefore there may be occasions when concerns about a child means that we must consult other agencies before we contact the parent/carer. The procedures UET follows have been laid down by the South-West Child Protection Procedures <https://www.proceduresonline.com/swcpp/> and are in accordance with local guidance.
- 6.2 Where a referral is needed, the DSL should seek the agreement of parents/carers before making the referral, unless to do so may place the child at increased risk of significant harm. However, lack of agreement should not stop a referral from going ahead. Advice will be taken from the local authority's Multi Agency safeguarding Hub, in the first instance.
- 6.3 Parents/carers are made aware of UET's Safeguarding Children at Risk Policy via the UET website www.uet.charity The policy and procedures are shared at transition meetings with parents/carers of new children, young people, or vulnerable adults.

7. Staff Code of Conduct

- 7.1 UET has a staff code of conduct in place which clearly states what behaviours are acceptable and what behaviours are not. A copy can be obtained from the Head of Service at any time.
- 7.2 At induction, staff sign to say that they have read and understood the document. This document is re-visited on annual basis to ensure staff understand expectations about conduct.
- 7.3 Volunteers are also provided with a concise code of conduct which provides guidance about expectations whilst volunteering for UET.

8. Online Safety

Technology is a significant component in many safeguarding and well-being issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

Children can abuse their peers online, this can take the form of abusive, harassing and misogynistic messages, the consensual and non-consensual sharing of indecent images and the sharing of abusive images and pornography, to those who do not want to receive such content.

8.1 Responding to online safety concerns

Staff will follow our safeguarding procedures. Staff should also be aware of the additional guidance outlined under 'peer on peer abuse, where additional guidance is provided, in relation to responding to concerns about the sharing of indecent images via mobile devices.

8.2 Provision responsibilities around online safety

This provision recognises: -

- the increasing role technology has to play in children's daily lives
- the wide range of content which is available to children via the internet
- that alongside the benefits of technology, there are also risks
the importance of keeping up to date with the tools, apps and devices children are using so that the tools offered is meaningful.

All staff who interact with children and young people, will continue to be vigilant and look out for signs that a child's safety and welfare might be at risk. Further guidance to keep pupils/students and staff safe when working remotely can be found in the [Safer Working Practice](#) addendum (published in April 20).

9. Managing Allegations

9.1 Alleged Abuse by adults working/volunteering with a child

If you become aware that a member of staff may have:

- Behaved in a way that has harmed, or may have harmed a child or
- Possibly committed a criminal offence against or related to a child or
- Behaved towards a child in a way that indicates they may pose a risk of harm
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children



The child and/or alleged abuser **SHOULD NOT** be questioned but a record made of what has been reported. **The alleged abuser should not be informed of the allegation at this stage.**



Report immediately to Short Break Manager (the Short Breaks manager) or if the allegation is about Short Break Manager then report to Jackie Smith CEO.



Report the allegation to the Local Authority Designated Officer for Allegations (LADO) (Swindon) / Designated Officer For Allegations (DOFA) (Wiltshire):

Swindon LADO Please call: 07392 103019 (Mon-Weds) 07824081177 (Thurs/Fri)

Wiltshire DOFA Please call: 01225 718079

Within one working day



The LADO/DOFA will decide on further action:

- No Further Action after Initial Consideration and Closure or
- Advice and Follow Up from LADO/DOFA or
- Allegations Strategy Discussion



No further action by the LADO

UET may be asked to complete their own enquiries and report the findings back to the LADO at the conclusion

Further action

The LADO will agree with the police whether a strategy meeting (police involvement) or an allegations meeting needs to take place



If a strategy discussion is not required, an **allegations management meeting** will be held. The main purpose of this is to ensure the safety of the child and ensure the process is concluded promptly, ensuring the accused staff member has adequate support

Allegations strategy discussion

This will take place if the child has suffered significant harm / is at risk of suffering significant harm, or if the alleged behaviour may constitute a criminal offence related to the child

9.2 Abuse of Trust

Under the Sexual Offences Act 2003 it is an offence for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child or young person, even if the relationship is consensual. This applies where the child or young person is in full time education and the person works in the same establishment as the child, even if she/he does not teach the child or young person.

10. Allegations Record-Keeping

- 10.1 All concerns raised about an adult working in the setting, including allegations, are recorded and held confidentially by the case manager.
- 10.2 All records are stored in line with the UET's GDPR policy
- 10.3 Where a strategy discussion/meeting has been held involving the LADO/DOFA the setting will be sent a copy of the minutes of the meeting. These will be held on file by the case manager.
- 10.4 Where an allegation is substantiated this will be referred to in any references provided by UET for the individual if and when they apply for new positions. If the adult is employed by an external agency, a copy of these records will be given to the senior lead of the organisation.
- 10.5 At the end of the allegation process if a member of staff or volunteer is removed from their position for causing harm or posing a risk of harm or they leave whilst investigations are on-going, the setting has a duty to inform the Disclosure and Barring Service via a referral.
- 10.6 We understand, as an organisation, that if we know or have reason to believe that an individual is barred, we are committing an offence if we allow the individual to carry out any form of regulated activity.
- 10.7 See also Chapter 4 Keeping Children Safe in Education (Sept 21)

Low level concerns

The following information should be recorded:-

- Details of the concern and the context in which the concern arose
- Action taken
- If advice was taken as to whether the LADO/DOFA was contacted for guidance

This information is retained until the individual leaves employment/volunteering role with the school.

Where a pattern of concerns emerges, these are recorded on a chronology. These are reviewed to decide whether the pattern of behaviour moves to concern to meeting the harms threshold, in which case it will be referred to the LADO/DOFA.

Following an allegation or low level concern

Consideration will be given as to whether there are areas of the schools safeguarding practice and procedure or wider cultural issues within the school which need addressing following an allegation or low level concern. Where appropriate, policies

will be revised or additional training provided to minimise the risk of this happening again.

Part 2 - Specific Safeguarding Themes

See also Pages 9-16 and Annex B KCSIE

Knowing what to look for is vital for the early identification of abuse, neglect and specific safeguarding issues such as exploitation.

If you are at all unsure you should **always** speak to the safeguarding team.

Peer on peer/ child on child abuse

17.42 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; upskirting 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.

17.42 We recognise that children are capable of abusing other children. This can happen both inside and outside of provision and online. A child may not find it easy to report peer on peer abuse and we recognise that they might show signs or act in ways that they hope an adult will notice, including a change in behaviour. Even if there are no reported cases of peer-on-peer abuse, we recognise that abuse may still be taking place but not being reported. We understand that the child who is perpetrating the abuse may also be at risk of harm, and we will make every effort to ensure that the perpetrator is supported appropriately.

Procedures in place to minimise the risk

- Staff receive regular training to ensure they know the signs and indicators which may suggest a child is at risk of peer-on-peer abuse and understand their role and responsibilities to report to the safeguarding team as soon as possible. Our provision has a zero-tolerance approach to abuse and regular staff training ensures that incidents of peer-on-peer abuse are never passed off as 'banter', part of growing up or 'boys being boys'. All incidents of peer-on-peer abuse are reported to the safeguarding team.

Peer on peer abuse can take the form of:-

1. Bullying (including Cyberbullying)

There is no legal definition of bullying. However, it's usually defined as behaviour that is:

- repeated
- intended to hurt someone either physically or emotionally

- often aimed at certain groups, for example because of race, religion, gender or sexual orientation

This can include:

- physical assault
- teasing
- making threats
- name calling
- Cyberbullying - bullying via mobile phone or online (for example via email, social networks and chat rooms on gaming platforms)
- Racist and Religious Bullying: A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status.
- Sexual, Sexist and Transphobic Bullying: includes any behaviour, whether physical or non- physical, where sexuality is used as a weapon by boys or girls.
- Homophobic Bullying: targets someone because of their sexual orientation (or perceived sexual orientation).
- Disablist Bullying: targets a young person based on their disability, special needs or health needs. This can include manipulative bullying where a perpetrator forces the victim to act in a certain way or exploiting a certain aspect of the victim's disability.

Peer on peer abuse can take the form of:-

2. Sexual abuse

See pages 138-142 and [Sexual violence and sexual harassment between children in schools and colleges \(September 21\)](#)

This can include:-

- Sexual violence and sexual harassment - Sexual violence and sexual harassment can occur between two pupils of **any age and sex**, from Primary, into Secondary and into College. **We recognise that 'it could happen here'**. It can occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils. 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.

Sexual violence can include:-

- Rape
- Assault by penetration
- Sexual Assault

Responding to concerns about peer on peer sexual abuse

Step 1

- Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted upon).

Step 2

- **Record** the incident using the provisions safeguarding recording procedures and **report** to the DSL / deputy in line with safeguarding and child protection procedures, as soon as possible. Is information about the incident first hand or do other individuals need to be spoken to, to confirm?

Step 3

- The DSL will consider the following:-
 1. The wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and support, they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
 2. Has a criminal offence been committed? If yes, contact the police (See also ['When To call the Police'](#) (NPCC) .
 3. Ages of children / developmental stage.
 4. Whether there is a power imbalance between the children.
 5. Whether the alleged incident is a one off incident or there is a sustained pattern.
 6. Any on-going risks to the victim, other children, or staff.
 7. Other related issues and the wider context, including whether there is evidence of the victim/s being exploited, criminally and/or sexually.

Step 4

- If there is no evidence to suggest that a criminal offence has taken place the DSL will consider next steps, in discussion with parents/carers unless to do so would increase the risk to the children involved.
- If there is evidence to suggest that a criminal offence has taken place the DSL will follow the guidance on pages 109-111 of KCSIE. Any report to the police will be in parallel with a referral to children's social care

This will typically involve:-

1. Considering support, including Early Help support for both the victim and perpetrator (does the perpetrator have unmet needs?)
2. Making a referral to children's social care if the victim has been harmed or is at risk of harm.
3. Making a referral to children's social care if the perpetrator is at risk of harm / being harmed (under-lying welfare and safety concerns which may have triggered behaviours).
4. Writing a risk assessment for children, who have been identified as being at increased risk of peer on peer abuse (considered for both the pupil perpetrating the abuse and the pupil who is the victim) to include protection and support.
5. Considering targeted education about healthy relations for the perpetrator and any additional sanctions under the behaviour policy.

Enquiries and Investigations:

10.8 Child protection enquiries by the LA or the police are not to be confused with internal, disciplinary enquiries by UET. UET may be able to use the outcome of external agency enquiries as part of its own procedures. The child agencies, including the police, have no power to direct UET to act in a particular way; however, UET should assist the agencies with their enquiries

10.9 UET shall hold in abeyance its internal enquiries while the formal police or LA investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to existing staff disciplinary procedures

10.10 If there is an investigation by an external agency, for example the police, the case manager should normally be involved, and contribute to, the inter-agency strategy discussions. The case manager is responsible for ensuring that they give every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained about the enquiries, in the interests of the member of staff about whom the allegation is made.

10.11 The adult at the centre of the allegation will be advised that they should consult with a representative, for example, a trade union. UET also has a duty of care for their staff and volunteers. A named contact will be allocated to touch base with the adult on a regular basis and check on their safety and welfare. The adult may also be sign-posted to additional support during this period.

10.12 Following advice from the LADO, the case manager shall:

- inform the individual reporting the allegation that the investigation is taking place and what the likely process will involve
- ensure that the parents/carers of the child involved in the allegation have been informed that the allegation has been made and what the likely process will involve
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- keep the CEO informed of the case

Suspension of Staff:

10.13 Suspension should not be automatic. In respect of staff suspension can only be carried out by the Head of Service. In respect of the Head of Service, suspension can only be carried out by the Chief Executive Officer (CEO) and the Board of Trustees.

10.14 Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g., paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from specified duties

10.15 If following advice from the LADO, it is decided that the adult will be suspended the following should be considered:

- The member of staff should be advised to seek the advice and/or assistance of their trade union and should be informed that they have the right to be accompanied by a trade union representative or work colleague. The member of staff should be informed that an allegation has been made and that a decision to suspend has been made. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day

The Disciplinary Investigation

10.16 Where a disciplinary investigation is required, this should be conducted in accordance with the existing staff disciplinary procedures.

10.17 The member of staff should be informed of:

- The disciplinary charge against them
- Their entitlement to be accompanied or represented by a trade union representative or work colleague

Lessons Learnt

10.18 Where an allegation has been made against a member of staff, the nominated Trustee, together with the DSL and Head of Service should, after the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of UET's procedures and/or policies. Consideration should also be given to the training needs of staff.

11. Whistle-blowing

11.1 UET expects the highest standards of conduct from all employees and Trustees and will treat seriously any concern raised about illegal or improper conduct. The law provides protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any legal obligation
- a concealment of any of the above is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed, a reasonable belief is sufficient. The employee has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place.

11.2 Staff and volunteers are encouraged to raise concerns about poor or unsafe practice and potential failings in the organisation's safeguarding regime.

11.3 In the first instance, unless the employee reasonably believes their manager to be involved in the wrongdoing, any concerns should be raised with the Manager. If he/she believes the Manager to be involved, then they should proceed straight to the CEO – Jackie Smith.

Where a member of staff feels unable to raise a concern with either of the individuals identified above the [NSPCC whistle-blowing](#) helpline is available to them.

0800 028 0285

12. Safer Recruitment

12.1 UET has recruitment and selection procedures which are detailed on the Safeguarding page of the UET website. These procedures ensure all recommended checks are undertaken when recruiting new staff. These procedures are regularly reviewed to ensure that they take account of the following:

- An enhanced DBS Disclosure is obtained as required for all new and existing appointments to UET's workforce. In addition, where an adult will be working unsupervised with a child, young person or vulnerable adult, an enhanced check against the barred lists will be completed (Children's Barred List and Vulnerable Adults Barred List)
- The post or role is clearly defined
- The key selection criteria for the post or role are clearly identified
- Vacancies are advertised widely to ensure a diversity of applicants and advertisements include a statement about the organisation's commitment to safeguarding children, young people and vulnerable adults
- Documentary evidence of academic/vocational qualifications is required
- Professional and character references are obtained
- Identity and employment history checks are carried out on all appointments to the UET workforce before the appointment is made
- A variety of selection techniques e.g., qualifications, previous experience, interview, reference checks are used
- Overseas' checks are completed where time has been spent living or working overseas.
- Questions about safeguarding are asked at interview

12.2 The UET maintain a single central record of all checks completed on staff, regular volunteers, and Trustees. This is checked by the service level manager three times a year.

13. Staff Training and Induction:

13.1 On joining the organisation all new staff, regular volunteers and Trustees are provided with safeguarding training as part of their induction.

13.2 This includes ensuring that they have read:

- The UET safeguarding policy
- The UET staff code of conduct / volunteers' code of conduct
- The UET health and safety policy
- Keeping Children Safe in Education – Part 1 and Annex A and B (where useful and relevant to the staff members' role)

13.3 The training ensures new staff understand the procedures to follow if they have concerns about a child or safeguarding concerns about the behaviour/conduct of an adult working or volunteering with children.

14. Appendix A

Indicators of Possible Abuse or Harm

14.1 Indicators of abuse should be suggestive of, not proof of, abuse as they rarely prove abuse has occurred. Any one or group of indicators could arise from other causes other than abuse. However, recognition of several factors or symptoms in any one individual should give rise to concern and lead to further assessment or investigation.

14.2 If a member of staff sees one or more indicators in an individual that must be discussed with the DSL/Deputy DSL(s). It could be the case that several staff are seeing some of these signs and that by openly sharing their observations, staff may become aware that they have each noticed a different aspect of the abuse and that by sharing information

a fuller picture may emerge. It is important to bear in mind that abuse may be perpetrated because of deliberate intent, negligence, or ignorance.

14.3 The following lists of indicators are not exhaustive and need to be used as a tool in the assessment of vulnerability and risk. Some of the following indicators may relate to more than one type of abuse and may also be an indicator of offending behaviour:

a. Indicators of Discriminatory Abuse:

- Lack of respect shown to an individual
- Failure to respect dietary needs.
- Failure to respect cultural and religious needs
- Signs of a sub-standard service offered to an individual
- Exclusion from rights and services afforded to citizens e.g., health, education, employment, criminal justice, and civic status

b. Indicators of Physical Abuse:

- Any injury not fully explained by the history given
- Injuries inconsistent with the lifestyle of the child, young person, or adult at risk
- Bruises and/or welts on face, lips, mouth, torso, arms, back, buttocks, thighs
- Cluster of injuries forming regular patterns or reflecting shape of article
- Burns, especially on soles, palms or back, immersion in hot water, friction burns, rope or electrical appliance burns
- Multiple fractures
- Lacerations or abrasions to mouth, lips, gums, eyes, external genitalia
- Marks on body, including slap marks, finger marks
- Injuries at different stages of healing.
- Medication misuse
- Enforced misuse of illegal or legal substances
- Inappropriate restraint

c. Indicators of Sexual Abuse:

- Significant change in sexual behaviour, language, or outlook
- Pregnancy in a child, or woman who is unable to consent to sexual intercourse
- Wetting or soiling
- Unexplained negative responses to personal/medical care tasks
- Signs of withdrawal, depression, and stress
- Full or partial disclosure or hints of sexual abuse
- Overly sexualised language
- Unusual difficulty in walking and sitting
- Pain or itching, bruises, or bleeding in genital area
- Sexually transmitted disease, urinary tract/vaginal infections in someone who is unable to consent to sexual intercourse
- Psychosomatic disorders - stomach pains, excessive period pains

d. Indicators of Psychological/Emotional Abuse:

- Change in appetite
- Low self-esteem, deference, passivity, and resignation
- Unexplained fear, defensiveness, ambivalence
- Emotional withdrawal
- Sudden change in behaviour
- Person managing care uses bullying, intimidation, or threats to induce desired behaviour
- Person managing care has punitive approach to bodily functions or incontinence

- Person is in receipt of malicious texts, emails or harmful contact while using social networking websites

e. Indicators of Financial Abuse:

- Unexplained sudden inability to pay for bills or maintain lifestyle
- Person lacks belongings or services they can clearly afford
- Recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- Lack of records and accounting of where money spent
- Unusual or suspicious bank account activity
- Power of attorney obtained when person is unable to comprehend and give consent
- Withholding money without legal reason
- Recent change of deeds or title of property
- Unusual interest shown by family or others in the person or the person's assets
- Person managing financial affairs is evasive or uncooperative
- Selling or offering to sell possessions of an adult at risk who does not have the capacity to consent or know the full value of those possessions

f. Indicators of Neglect:

- Inadequate heating and/or lighting
- Inappropriate, old, or shabby clothing, or being kept in night clothes during the day
- Sensory deprivation, not allowed to have hearing aid, glasses or other aids to daily living; Physical condition is poor e.g., treated, or untreated pressure ulcers
- Inadequate physical environment
- Inadequate diet
- Untreated injuries or medical problems
- Inconsistent, frequently unexplained, or reluctant contact with health or social care agencies
- Failure to engage in social interaction
- Malnutrition when not living alone.
- Failure to give/offer prescribed medication/treatment
- Poor personal hygiene

g. Indicators of Institutional Abuse:

- Inappropriate or poor care, poor care planning and inconsistent application of care plans
- Misuse of medication
- Higher than average levels of mortality
- Higher than average levels of accidents and incidents and "near misses"
- Inappropriate physical restraint or intervention
- Inappropriate use of chemical restraint
- Sensory deprivation e.g., denial of use of spectacles, hearing aid etc
- Lack of recording on client files
- Lack of respect shown to person
- Denial of visitors or phone calls
- Restricted access to toilet or bathing facilities
- Restricted access to appropriate medical or social care
- Lack of privacy or failure to ensure appropriate privacy or personal dignity
- Lack of flexibility and choice e.g., mealtimes and bedtimes, choice of food
- Lack of personal clothing and possessions
- Lack of response to specialists' guidance

- Lack of consideration given to an individual's mental capacity and their best interests
- Overly restrictive care planning & use of restrictive practice without proper authority or consent
- Lack of adequate procedures e.g., for medication, financial management
- Controlling relationships between staff and service users
- Poor professional practice
- Lack of response to complaints

h. Other Indicators:

- Other forms of abuse (e.g., Domestic Violence, child abuse and cruelty to animals) may highlight an increased risk that adult abuse may be taking place. Self-harm or self-neglect may also be considered an indicator of harmful actions by someone other than the individual at risk

15 Appendix B

15.1 Definitions of Abuse (taken from Working Together July 2018)

Physical Abuse

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

Neglect

- a. 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 development. Neglect may occur during pregnancy because of maternal substance abuse
- b. Once a child is born, neglect may involve a parent or carer failing to:
 - Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
 - Protect a child from physical and emotional harm or danger
 - Ensure adequate supervision (including the use of inadequate caregivers)
 - Ensure access to appropriate medical care or treatment
- c. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Emotional Abuse

- a. The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

- a. Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child, young person or vulnerable adult 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/young person or vulnerable adult 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.

15. Appendix C

Safeguarding and Child Protection

Disclosure/Concern/ Incident Form

CONFIDENTIAL

CONFIDENTIAL

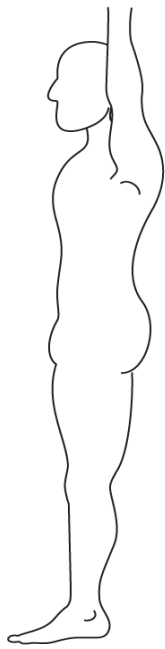
Date:		Name and role of person completing form:	
Time:		Date and time read by the DSL/DDSL:	
Name of child:		DOB of child:	
<i>What have you heard/seen/noticed which concerns you?</i>			
<i>What are you worried about?</i>			
<i>Action taken by person(s) above:</i>			
<u>DO NOT LEAVE ON DSL'S DESK – THIS FORM MUST BE HANDED TO THE DSL / DDSL</u>			
To be completed by the DSL/DDSL			
<i>Include reference here to other members of the safeguarding team or external professionals you may have discussed the concern with.</i>			
<i>Detail of decision / action agreed by DSL or Deputy (highlight those which apply):-</i>			
<ul style="list-style-type: none"> • <i>Monitor the situation (include date here for review)</i> • <i>Referral to Children's/Adult's Social Care</i> • <i>Emergency action required to keep child/yp safe – police contacted</i> 			
<i>Has the local authority threshold guidance been referred to at this point? Yes / No</i>			
<i>Is there evidence that the threshold for significant harm (section 47) has been met?</i>			
<i>Reason(s) for this decision or action by DSL or Deputy:</i>			
<i>Notes of feedback between DSL/ Deputy and the person who raised this child protection concern, including date of feedback:</i>			
<i>Has the information on this form been shared with the parent/carer? If no, please give reasons for decision not to share.</i>			
Date for review:		Name of person(s) to review:	
<i>Notes of review (if necessary continue on a separate page and attach):</i>			
Concern Form added to student chronology and file?		Y / N	
Details of concern added to central record?		Y / N	

16. Appendix D

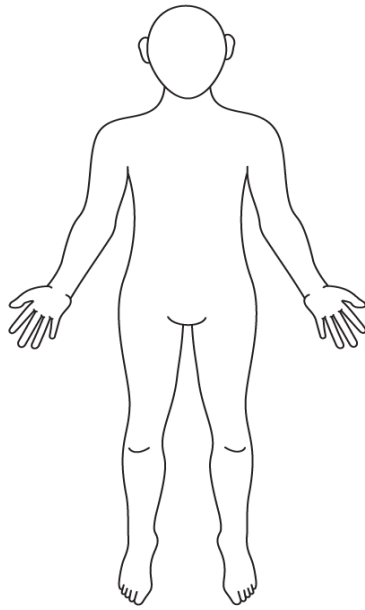
Safeguarding Body map

Guidance Notes

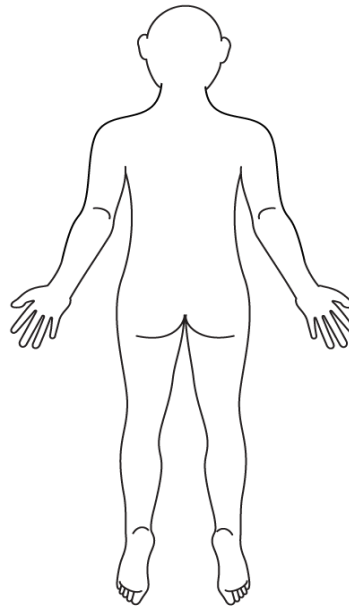
- Record all visible marks
- Appearance, size & colour
- Note exact location
- Clearly mark: Bruising, Redness, Abrasion, Scratch, Laceration, Rash, Dry skin, Pressure sore



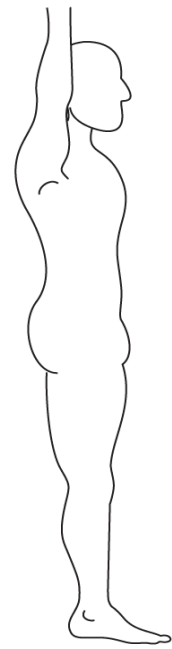
LEFT



FRONT



BACK



RIGHT

Comments:

Completed by:

Job Role:

Date:

17. Appendix E –Further Information (taken from ‘Keeping Children Safe in Education September 2021)

Children missing from education

17.1 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

17.2 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)

17.3 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.

17.4 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.

17.5 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.

17.6 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.

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

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late; and

- children who regularly miss school or education or do not take part in education.

17.8 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.

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

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

County lines

17.10 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.

17.11 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.

17.12 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.

17.13 Several 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.

Domestic abuse

17.14 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).

17.15 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.

17.16 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.

17.17 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.

Operation Encompass

17.18 Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children’s social care if they are concerned about a child’s welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website

National Domestic Abuse Helpline

17.19 Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and

support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

17.20 Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse) 130
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness

17.21 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.

17.22 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.

17.23 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.

So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)

17.24 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 131 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

17.25 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 teachers¹²⁸ that requires a different approach (see following section).

17.26 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

17.27 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](#).

17.28 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](#).

Forced marriage

17.29 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.

17.30 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 fmufcdo.gov.uk.

Preventing radicalisation

17.31 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.

17.32 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).

17.33 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 alert to changes in children's behaviour, which could indicate that they may be in need of 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.

17.34 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

17.35 All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism 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.

17.36 Designated safeguarding leads and other senior leaders 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). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

17.37 There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

Channel

17.38 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.

17.39 The department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

17.40 The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

17.41 Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

Sexual violence and sexual harassment between children in schools and colleges

Context

17.43 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.

17.44 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.

17.45 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.

17.46 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.

17.47 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, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence

17.48 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. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

- a. 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.
- b. 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.
- c. 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.

17.49 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.)

17.50 **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.

Sexual harassment

17.50 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

17.51 Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual 'jokes' or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

17.52 It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats;
- and upskirting.

18. Diversity and Inclusion Impact Assessment

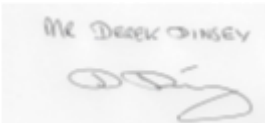
18.1 This Policy has been Diversity and Inclusion Impact Assessed to identify opportunities to promote equality and mitigate any negative or adverse impacts on particular groups.

This Policy is adopted by Uplands Enterprise Trust and will be reviewed every year or earlier if changes to legislation are made.



Signed CEO:

Print name: Jackie Smit



Signed Chairman of UET's Board of Trustees

Print name: Derek Dinsey

Date: 16th March 2022