



# SAFEGUARDING

JUNE 2024

## Table of Contents

Aims.....	2
Principles & Values .....	2
Areas of Safeguarding .....	3
Part 1 – High risk & emerging safeguarding issues .....	4
Contextual Safeguarding .....	4
Preventing Radicalisation & Extremism .....	4
Gender based violence / Violence against women & girls .....	4
Female Genital Mutilation (FGM) .....	4
Forced Marriage.....	5
Honour-Based Abuse .....	6
Teenage Relationship Abuse .....	6
Sexual Violence & Sexual Harassment Between YP.....	7
Upskirting.....	7
The Trigger Trio.....	8
Domestic Abuse .....	8
Parental mental health .....	9
Parental Substance misuse.....	9
Young Carers .....	10
Missing, Exploited & Trafficked YP (MET).....	10
YP Absent from Education.....	10
YP Missing from Home or Care.....	11
Child Sexual Exploitation (CSE) .....	12
Child Criminal Exploitation (including county lines) .....	13
Serious Violence .....	14
Trafficked Children & modern slavery .....	14
Child abduction .....	16
Returning home from care .....	16
Technologies .....	16
Online Safety & Social Media .....	17
Cyberbullying .....	17
Sexting.....	17
On-line sexual abuse .....	18
Gaming .....	18
Online reputation .....	18
Grooming.....	18
Part 2 – Safeguarding issues relating to individual YP needs.....	19
Homelessness .....	19
YP & the Court System.....	19
YP with family members in prison.....	19
YP with medical conditions (in the Organisation) .....	20
YP with medical conditions (out of Organisation).....	20
Special educational needs & disabilities (SEND).....	20
Mental Health .....	21
Part 3 – Other safeguarding issues that may potentially have an impact on YP.....	21
Bullying.....	21
Prejudice-based abuse .....	21
Drugs & substance misuse .....	22
Faith Abuse .....	22
Gangs & Youth Violence .....	23
Private fostering.....	23
Part 4 –Safeguarding processes .....	23
Safer Recruitment.....	23
Staff Code of Conduct .....	23
Training .....	24
Health & Safety .....	24
Site Security.....	25
Off site visits.....	25
First Aid .....	25
Physical Contact & Intervention.....	25
Taking & the use & storage of images.....	25
Disqualification under the childcare act .....	26

## Policy Statement

Legal safeguarding duties apply to all children under 18. Legal safeguarding duties further apply to an adult at risk. An adult at risk is someone aged 18 years or over 'who is, or may be, in need of community care services by reason of mental or other disability, age or illness; & who is or may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation.'

Safeguarding determines the actions that we take to keep children & vulnerable adults safe & protect them from harm in all aspects of their life. We collectively call our service users Young People (YP). We are committed to safeguarding & promoting the welfare of all YP who access Overworld AMP Ltd services.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect & responsibilities; to respond to specific issues & vulnerabilities all form part of the safeguarding responsibilities of the Organisation. As such, this overarching policy will link to other policies which will provide more information & greater detail.

## Aims

- To provide staff & volunteers with the framework to promote & safeguard the wellbeing of YP & in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the Organisation
- To demonstrate our commitment to protecting YP.

## Principles & Values

Safeguarding is everyone's responsibility. All staff who have contact with YP should be alert to the possibility that a YP at risk may experience abuse or neglect. All concerns should be raised using the Organisation's Child Protection Procedure.

Safeguarding & promoting the welfare of YP is everyone's responsibility. Everyone who comes into contact with YP & their families has a role to play. In order to fulfil this responsibility effectively, all staff should make sure their approach is person-centred. This means that they should consider, at all times, what is in the best interests of the YP.

Safeguarding measures are put in place to minimise harm to YP. There may be occasions where gaps or deficiencies in our policies & processes will be highlighted. In these situations, a review will be carried out in order to identify learning & inform the policy, practice & culture of the Organisation.

All YP in our Organisation can talk to any member of staff about situations, or to share concerns, which are causing them worries. The staff will listen to them, take their worries seriously & share the information with the safeguarding lead.

The Organisation will also follow the six key principles that underpin adult safeguarding, as set out in the Care Act 2014;

- **Empowerment:** People are supported & encouraged to make their own decisions & informed consent. *"I am asked what I want as the outcomes from the safeguarding process & these directly inform what happens."*
- **Prevention:** It is better to take action before harm occurs. *"I receive clear & simple information about what abuse is, how to recognise the signs & what I can do to seek help."*
- **Proportionality:** The least intrusive response appropriate to the risk presented. *"I am sure that the professionals will work in my best interest, as I see them, & they will only get involved as much as needed."*

- **Protection:** To support & protect those in greatest need. *"I get help & support to report abuse & neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."*
- **Partnership:** Working collaboratively with other agencies. *"I know that staff treat any personal & sensitive information in confidence, only sharing what is helpful & necessary. I am confident that professionals will work together & with me to get the best result for me."*
- **Accountability:** To be transparent about, & responsible for, our safeguarding practices. *"I understand the role of everyone involved in my life & so do they."*

## Areas of Safeguarding

The Children Act 1989 (& associated Regulations), the Children Act 2004 (& Regulations), as amended by the Children & Social Work Act 2017, Working Together to Safeguard Children, Keeping Children Safe in Education & the Ofsted inspection guidance have highlighted & separated a number of safeguarding areas.

Safeguarding adults relates to adults at risk, as defined under the Care Act 2014 are individuals who have care & support needs & due to these additional needs, may be unable to protect themselves from abuse, neglect or exploitation.

## Definitions

Within this document:

**Safeguarding** is defined in the Children Act as protecting from maltreatment; preventing impairment of health & development; ensuring that children grow up with the provision of safe & effective care; & work in a way that gives the best life chances & transition to adult hood.

The term **Staff** applies to all those working for or on behalf of the Organisation, full time or part time, in either a paid or voluntary capacity.

For the purposes of our policies **YP**, refers to under 18s & adults who have an Educational, Health & Care Plan (EHCP) or could otherwise be classed 'at risk'

**Parent** refers to birth parents & other adults in a parenting role for example adoptive parents, guardians, stepparents & foster carers.

**DSL** Designated Safeguarding Lead & **SSDL** Deputy Designated Safeguarding Lead are key personnel within the Organisation, trained to Safeguarding Level 3 standard & responsible for managing safeguarding best practices within the Organisation, escalating any events & working with the authorities to see those events through to completion.

**SAB** Safeguarding Adults Board. Section 43 of the Care Act requires every Local Authority to establish a Safeguarding Adults Board (SAB) for its area. The SAB operates at a strategic level, helping and protecting adults in its area from abuse & neglect through co-ordinating & reviewing a multi-agency approach across all member organisations.

## Key personnel

**The DSL** for the Organisation is:

Mark Pickering, Managing Director: [markp@overworldnetwork.com](mailto:markp@overworldnetwork.com) 07885782742

**The DDSLs:**

Stephen Mitchell, Head of Pastoral Care: [steve.mitchell@overworld-amp.uk](mailto:steve.mitchell@overworld-amp.uk)

Emma Rothery, Training & Quality Manager: [emma.rothery@overworld-amp.uk](mailto:emma.rothery@overworld-amp.uk)

## **Part 1 – High risk & emerging safeguarding issues**

### **Contextual Safeguarding**

All staff should be aware that safeguarding incidents &/or behaviours can be associated with factors outside the Organisation &/or can occur between YP outside of our Organisation. All staff, but especially the DSL & DDSL should consider whether YP are at risk of abuse or exploitation in situations outside their families.

Risk & harm outside of the family can take a variety of different forms & children can be vulnerable to sexual exploitation, criminal exploitation, & serious youth violence in addition to other risks.

As an Organisation, we will consider the various factors that can impact the life of any YP about whom we have concerns. We will consider the level of influence that these factors have on their ability to be protected & remain free from harm, particularly around child exploitation or criminal activity.

What life is like for a YP outside the Organisation, within the home, within the family & within the community are key considerations when the DSL is looking at any concerns.

### **Preventing Radicalisation & Extremism**

The Prevent Duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks include, but are not limited to, political, environmental, animal rights, or faith-based extremism that may lead to a child becoming radicalised. All staff have received awareness training in order that they can identify the signs of children being radicalised.

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 & friends may contribute to a child's vulnerability. Similarly, radicalisation & the grooming of children can occur through many different methods, such as social media or the internet, & at different settings.

Any child who is considered vulnerable to radicalisation will be referred by the DSL to the relevant local children's social care or SAB as applicable, where the concerns will be considered in the local process. If the police Prevent Officer considers the information to be indicating a level of risk a "channel panel" will be convened & the Organisation will attend & support this process.

To access Hampshire's Prevent National Referral Form click below & scroll down to 'no Immediate threat': <https://www.hants.gov.uk/community/prevent>

All staff will be expected to pass Prevent Duty training at Induction [Prevent Duty Training link](#)

### **Gender based violence / Violence against women & girls**

<https://www.gov.uk/government/policies/violence-against-women-&-girls>

The government has a strategy looking at specific issues faced by women & girls. Within the context of this safeguarding policy the following sections are how we respond to violence against girls: female genital mutilation, forced marriage, honour-based violence & teenage relationship abuse all fall under this strategy.

### **Female Genital Mutilation (FGM)**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits & harms girls & women in many ways. It involves removing & damaging healthy & normal female genital tissue, & hence interferes with the natural function of girls' & women's bodies.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage

or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 & 8 & therefore girls within that age bracket are at a higher risk.

FGM is illegal in the UK.

On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out & the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL will be informed & the member of staff must call the police to report suspicion that FGM has happened. At no time will staff examine YP to confirm concerns

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women & girls. Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, & hammers to delay the appearance of puberty. This practice is considered to be abusive & should be referred to children's social care or SAB as applicable.

### **Forced Marriage**

In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage & duress is involved. Duress can include physical, *psychological*, *financial*, *sexual* & *emotional pressure*.' In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. is under 18.

It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns & where to turn for advice.

Advice & help can be obtained nationally through the Forced Marriage Unit & locally through the local police safeguarding team or children's social care. Policies & practices in this Organisation reflect the fact that while all members of staff, have important responsibilities with regard to YP who may be at risk of forced marriage, staff should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

### **Characteristics that may indicate forced marriage**

While individual cases of forced marriage, & attempted forced marriage, are often very particular, they are likely to share several common & important characteristics, including:

- an extended absence from school, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction & control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income & students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; &/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons & may not necessarily represent a pretext for forced marriage.

## Honour-Based Abuse

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family &/or the community, including female genital mutilation (FGM), forced marriage, & practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure & can include multiple perpetrators. It is important to be aware of this dynamic & additional risk factors when deciding what form of safeguarding action to take.

It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour-based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family
- are exploring their sexuality or identity

Women & girls are the most common victims of honour-based abuse however, it can also affect men & boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

All forms of honour-based abuse are abusive (regardless of the motivation) & should be handled & escalated as such. If staff believe that a YP is at risk or has already suffered from honour-based abuse, they will report to the DSL who will follow the usual safeguarding referral process; however, if it is clear that a crime has been committed or the YP is at immediate risk, the police will be contacted in the first instance. It is important that, if honour-based abuse is known or suspected, communities & family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

## Teenage Relationship Abuse

Relationship abuse can take place at any age & describes unacceptable behaviour between two people who are in a relationship.

Research has shown that teenagers do not always understand what may constitute abusive & controlling behaviours, e.g. checking someone's 'phone, telling them what to wear, who they can/can't see or speak to or coercing them to engage in activities they are not comfortable with. The government campaign "disrespect nobody" provides other examples of abusive behaviour within a relationship.

This lack of understanding can lead to these abusive behaviours feeling 'normal' & therefore left unchallenged, as they are not recognised as being abusive.

If the Organisation has concerns about a child in respect of relationship abuse, it will report those concerns in line with procedures to the appropriate authorities as a safeguarding concern, a crime or both.

## **Sexual Violence & Sexual Harassment Between Young People**

Sexual violence & sexual harassment (SVSH) can occur between two YP of any age & sex from primary to secondary stage & into colleges. It can also occur through a group of YP sexually assaulting or sexually harassing a single YP or group of YP.

Within our Organisation all staff receive training about sexual violence & sexual harassment & what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence & sexual harassment & more likely it will be perpetrated by boys/men. This pattern of prevalence will not, however, be an obstacle to ALL concerns being treated seriously. We will also take seriously any sharing of sexual images (photos, pictures or drawings) & videos; sexual jokes, comments or taunting either in person or on social media; or on-line sexual harassment.

The *Child Protection Policy & Procedures* has a clear procedure dealing with SVSH. We will follow Part five in KCSiE child-on child sexual violence & sexual harassment.

'Making it clear that there is a zero-tolerance approach to sexual violence & sexual harassment, that it is never acceptable, & it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment & in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal & not coming forward to report it.

In addition, recognising, acknowledging, & understanding the scale of harassment & abuse & that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

Also challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts & genitalia, pulling down trousers, flicking bras & lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.'

All staff will maintain the attitude that "It could happen here"

### **Upskirting**

In 2019 the Voyeurism Offences Act came into force & made the practice of upskirting illegal.

Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

If staff become aware that upskirting has occurred, this will be treated as a sexual offence & reported accordingly to the DSL & onwards to the police.

Behaviours that would be considered as sexual harassment which may be pre-cursors to upskirting, such as the use of reflective surfaces or mirrors to view underwear or genitals, will not be tolerated & the Organisation will respond to these with appropriate & education.

YP who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved on. These locations could include stairwells, under upper floor walkways, outside changing areas & toilets or sitting on the floor or laying down in corridors.

If technology that is designed for covert placement & could be used to take upskirting or indecent images is discovered in the Organisation, it will be confiscated. If the technology is in location & potentially may have captured images, this will be reported to the police & left in situ so that appropriate forensic measures may be taken to gather evidence.



Any confiscated technology will be passed to the DSL to make a decision about what happens to the items. This will be carried out under the principles set out in the government guidance on [searching, screening & confiscation](#).

If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

### **The Trigger Trio**

The term 'Trigger Trio' has replaced the previous phrase 'Toxic Trio' which was used to describe the issues of domestic violence, mental ill-health & substance misuse which have been identified as common features of families where harm to adults & children has occurred.

The Trigger Trio are viewed as indicators of increased risk of harm to YP. In an analysis of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the triggers were present. These factors will have a contextual impact on the safeguarding of YP.

### **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 & 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 & family members. The definition captures a range of different abusive behaviours, including physical, emotional & economic abuse & coercive & controlling behaviour. Both the person who is carrying out the behaviour & the person to whom the behaviour is directed towards must be aged 16 or over & they must be "personally connected"

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse & child/adolescent to parent violence & abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background & 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 & perpetrators, including the impact on children.

All YP can witness & be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse &/or violence can have a serious, long lasting emotional & 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.

Controlling behaviour is a range of acts designed to make a person subordinate &/or dependent by isolating them from sources of support, exploiting their resources & capacities for personal gain, depriving them of the means needed for independence, resistance & escape & regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation & intimidation or other abuse that is used to harm, punish, or frighten their victim.

Indicators that a YP is living within a relationship with domestic abuse may include:

- being withdrawn
- suddenly behaving differently
- anxiety
- being clingy
- depression
- aggression
- problems sleeping
- eating disorders
- bed wetting
- soiling clothes

- excessive risk taking
- missing Organisation
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol
- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse but should be considered as indicators that this may be the case.

If staff believe that a YP is living with domestic abuse, this will be reported to the DSL for referral, to be considered by children's social care or SAB as applicable.

### **Parental mental health**

The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression & anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a YP's developmental needs, but it is essential to always assess its implications for each YP in the family. It is essential that the diagnosis of a parent's/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For YP, the impact of poor parental mental health can include:

- The parent's/carer's needs or illnesses taking precedence over the YP's needs
- The YP's physical & emotional needs being neglected
- The YP acting as a young carer for a parent or a sibling
- The YP having restricted social & recreational activities
- The YP finding it difficult to concentrate, potentially having an impact on educational achievement
- The YP missing Organisation regularly as (s)he is being kept home as a companion for a parent/carer
- The YP adopting paranoid or suspicious behaviour as they believe their parent's delusions
- Witnessing self-harming behaviour & suicide attempts (including attempts that involve the YP)
- Obsessional compulsive behaviours involving the YP.

If staff become aware of any of the above indicators, or others that suggest a YP is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care or SAB as applicable.

### **Parental Substance misuse**

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social & interpersonal, financial or legal nature for users & those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse & personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For YP, the impact of parental substance misuse can include:

- Inadequate food, heat & clothing for YP (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual &/or aggressive behaviour
- Bullying (including due to poor physical appearance)

- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- YP talking of or bringing into Organisation drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance
- Poor attendance or late arrival

These behaviours themselves do not indicate that a YP's parent is misusing substances but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to children's social care or SAB, as applicable, to be considered.

### **Young Carers**

As many as 1 in 12 under 18's provide care for another person. This could be a parent, a relative or a sibling & for different reasons such as disability, chronic illness, mental health needs, or adults who are misusing drugs or alcohol.

Under 18's who provide care for another are Young Carers. These young people can miss out on opportunities, & the requirement to provide care can impact on attendance or punctuality to Overworld AMP Ltd, limit time for homework, leisure activities & social time with friends.

As an Organisation we may refer a young carer to children's social care for a carers assessment to be carried out. We will consider support that can be offered & make use of the resources & guidance from Save the Children in their young carers work.

### **Missing, Exploited & Trafficked Young People (MET)**

Within Hampshire, the acronym MET is used to identify all YP who are missing; believed to be at risk of or are being exploited; or who are at risk of or are being trafficked. Given the close links between all these issues, there has been a considered response to view them as potentially linked, so that cross over of risk is not missed.

### **Young People Absent from Education**

All staff should be aware that under 18's being absent from school or college, particularly repeatedly &/or for prolonged periods, & YP missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse & neglect such as sexual abuse or exploitation & can also be a sign of 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, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk.

DSLs & staff should consider:

Missing sessions: Are there patterns in the sessions that are being missed?

- Is the YP being exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other YP routinely missing the same sessions & does this raise other risks or concerns such as SVSH between pupils, exploitation, gang behaviour or substance misuse?
- Is the session being missed one that would cause bruising or injuries to become visible?

Single missing days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the YP is away from the area? Are there specific sessions or members of staff on these days? Is the

parent/LA/school informing the Organisation of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the YP being sexually exploited during this day?
- Is the YP avoiding abusive behaviour from peers or staff on this day?
- Do the parents appear to be aware & are they condoning the behaviour?
- Are the YP's peers making comments or suggestions as to where the YP is?
- Can the parent be contacted & made aware?

Continuous missing days: Has the Organisation been able to make contact with the parent(s)/LA/school? Is medical evidence being provided?

- Did we have any concerns about radicalisation, FGM, forced marriage, honour- based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?
- Does the parent have any known medical needs? Is the child safe?

The Organisation will view absence as both a safeguarding issue & an educational outcomes issue.

### **Young People Missing from Home or Care**

It is known that YP who go missing are at risk of suffering significant harm, & there are specific risks around under 18's running away & the risk of sexual exploitation. The local Police Force, as the lead agency for investigating & finding missing YP, will respond to YP going missing based on on-going risk assessments in line with current guidance.

The police definition of 'missing' is: "Anyone whose whereabouts cannot be established will be considered as missing until located, & their well-being or otherwise confirmed."

Various categories of risk should be considered & the relevant Local Safeguarding Children's Partnership provides further guidance. Local authorities have safeguarding duties in relation to YP missing from home & should work with the police to risk assess & analyse data for patterns that indicate particular concerns & risks.

The police will prioritise all incidents of missing YP as medium or high risk. Where a YP is recorded as being absent, the details will be recorded by the police, who will also agree review times & any on-going actions with person reporting.

A missing YP incident would be prioritised as 'high risk' where:

- the risk posed is immediate & there are substantial grounds for believing that the YP is in danger through their own vulnerability; or
- the YP may have been the victim of a serious crime; or
- the risk posed is immediate & there are substantial grounds for believing that the public is in danger.

The high-risk category requires the immediate deployment of police resources.

Authorities need to be alert to the risk of sexual exploitation or involvement in drugs, gangs or criminal activity, trafficking & to be aware of local "hot spots", as well as concerns about any individuals with whom YP might runaway. Child protection procedures must be initiated in collaboration with children's social care services whenever there are concerns that an under 18 who is missing may be suffering, or likely to suffer, significant harm.

Within any case of YP who are missing both push & pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless

- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio (domestic abuse, parental mental ill health & parental substance misuse)

Pull factors include:

- Wanting to be with family/friends
- Drugs, money & any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking YP, there will be pressure to make contact with their trafficker.

We will inform the client e.g. parent, LA or school of YP who are absent (unless the client has informed us). If the client is also unaware of the location of the child, & the definition of missing is met, we will either support the client to contact the police to inform them or do so ourselves with urgency.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, & touching outside clothing. It may include non-contact activities, such as involving YP in the production of sexual images, forcing YP to look at sexual images or watch sexual activities, encouraging YP to behave in sexually inappropriate ways or grooming a YP in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, & may happen without the YP's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any person, who has been coerced into engaging in sexual activities. This includes 16 & 17 year olds who can legally consent to have sex. Some YP may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. (from KCSiE)

- Exploitation can be isolated (one-on-one) or organised group/criminal activity
- There can be a big age gap between victim & perpetrator, but it can also be YP on YP
- Boys can be targeted just as easily as girls – this is not gender specific
- Perpetrators can be women & not just men
- Exploitation can be between males & females or between the same genders
- YP with learning difficulties can be particularly vulnerable to exploitation as can YP from particular groups, e.g. looked after children, young carers, YP who have a history of physical, sexual emotional abuse or neglect or mental health problems; YP who use drugs or alcohol, children who go missing from home or Organisation, YP involved in crime, YP with parents/carers who have mental health problems, learning difficulties/other issues, YP who associate with other YP involved in exploitation. However, it is important to recognise that any YP can be targeted

Indicators a child may be at risk of CSE include:

- going missing for periods of time or regularly coming home late;
- regularly missing sessions at the Organisation or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections or becomes pregnant;
- mood swings or changes in emotional wellbeing;
- drug & alcohol misuse;
- displaying inappropriate sexualised behaviour.

CSE can happen to a YP of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited & do not see themselves as a victim.

CSE can be a one-off occurrence or a series of incidents over time & range from opportunistic to complex organised abuse. It can involve force &/or enticement-based methods of compliance & may, or may not, be accompanied by violence or threats of violence.

We educate all staff in the signs & indicators of sexual exploitation. YP who have been exploited will need additional support to help maintain them in education. We use the child exploitation risk assessment form (CERAF) & associated guidance from the relevant Safeguarding Children Partnership to identify YP who are at risk; the DSL will share this information as appropriate with children's social care or SAB as applicable.

We recognise that we may have information or intelligence that could be used to both protect YP & prevent risk. Any relevant information that we have will be shared on the community partnership information (CPI) form which can be downloaded from <https://www.safe4me.co.uk/portfolio/sharing-information/>

### **Child Criminal Exploitation (including county lines)**

Child Criminal Exploitation (CCE) is defined as:- *'where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, &/or (b) for the financial or other advantage of the perpetrator or facilitator &/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'*

The exploitation of YP for crime is not a new phenomenon as evidenced by Fagan's gang in Charles Dickens book, Oliver Twist. Children under the age of criminal responsibility, or young people & adults at risk, who have increased vulnerability due to push: pull factors who are manipulated, coerced or forced into criminal activity provide opportunity for criminals to distance themselves from crime.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys & girls being criminally exploited may be at higher risk of sexual exploitation

A current trend in criminal exploitation of YP is 'county lines' which refer to a 'phone line through which drug deals can be made. An order is placed on the number & typically a YP will deliver the drugs to the specified address & collect the money for the deal. These lines are owned & managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas. YP are often recruited to move drugs & money between locations & are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. YP can easily become trapped by this type of exploitation, as county lines gangs create drug debts & can threaten serious violence & kidnap towards victims (& their families) if they attempt to leave the county lines network.

Indicators that a YP may be criminally exploited include:

- Increase in **Missing episodes** – particular key as YP can be missing for days & drug run in other counties
- Having unexplained amounts of money, **new high-cost items** & multiple mobile phones
- Increased social media & phone/text use, almost always secretly
- **Older males** in particular seen to be hanging around & driving
- Having injuries that are unexplained & being unwilling to have them looked at
- Increase in aggression, violence & fighting
- Carrying **weapons** – knives, baseball bats, hammers, acid

- Travel receipts that are unexplained
- **Significant missing** from education & disengaging from previous positive peer groups
- Association with other YP involved in exploitation
- YP who misuse drugs & alcohol
- Parent concerns & significant changes in behaviour that affect emotional wellbeing

We will treat any YP who may be criminally exploited as a victim in the first instance & using the CERAF form & guidance in our referral to children's social care or SAB as applicable. If a referral to the police is also required, as crimes have been committed on the Organisation premises, these will also be made. Under 18's who have been exploited will need additional support to help maintain them in education.

If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form. <https://www.safe4me.co.uk/portfolio/sharing-information/>

### **Serious Violence**

Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement & criminal activity. All staff will be made aware of indicators, which may signal that YP, or members of their families, are at risk from or involved with serious violent crime.

These indications can include but are not limited to increased absence from sessions at the Organisation; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm; significant change in wellbeing; signs of assault; unexplained injuries; unexplained gifts &/or new possessions; possession of weapons.

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment & having been involved in offending, such as theft or robbery. Advice for staff can be found in in the Home Office's [Preventing youth violence & gang involvement](#).

We have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions. We will report concerns of serious violence to police & social care.

If there is information or intelligence about potential serious violence, we will report this to the police via the community partnership information form. <https://www.safe4me.co.uk/portfolio/sharing-information/>

### **Trafficked Children & modern slavery**

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

Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK)
- Control, through harm / threat of harm or fraud
- For the purpose of exploitation

Any YP transported for exploitative reasons is considered to be a trafficking victim. There is significant evidence that YP (both of UK & other citizenship) are being trafficked internally within the UK & this is regarded as a more common form of trafficking in the UK.

There are a number of indicators which suggest that a YP may have been trafficked into the UK, & may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, &/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history of going missing & unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Is being cared for by adult/s who are not their parents & the quality of the relationship between the child & their adult carers is not good
- Is one among a number of unrelated YP found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported.

For those YP who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation/the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a YP i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing & being found in areas where the YP has no known links; &/or
- Possible inappropriate use of the internet & forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a YP is being trafficked but should be considered as indicators that this may be the case. When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today.

YP being forced to work in restaurants, nail bars, car washes & harvesting fruit, vegetables or other foods may have all been slaves 'hiding in plain sight' within the U.K & rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within



the UK. If staff believe that a YP is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care or SAB as applicable.

### **Child abduction**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for them. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends & acquaintances); & by strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org)

When we consider who is abducted & who abducts

- Nearly three-quarters of children abducted abroad by a parent are aged between 0 & 6 years-old
- Roughly equal numbers are boys & girls
- Two-thirds of children are from minority ethnic groups.
- 70% of abductors are mothers. The vast majority have primary care or joint primary care for the child abducted.
- Many abductions occur during school holidays when a child is not returned following a visit to the parent's home country (so-called 'wrongful retentions')

If we become aware of an abduction of any of our YP, we will follow the HIPS procedure & contact the police & children's social care or SAB as applicable (if they are not already aware).

If we are made aware of a potential risk of abduction, we will seek advice & support from police & children's social care or SAB as applicable to confirm that they are aware & seek clarity on what actions we are able to take.

### **Returning home from care**

When YP are taken into care, consideration may be given in the future to those YP being returned to the care of their parents, or one of their parents. Other YP are placed in care on a voluntary basis by the parents & they are able to remove their voluntary consent.

While this is a positive experience for many YP who have returned to their families, for some there are different challenges & stresses in this process.

As an Organisation, if we are aware of one of our YP who is looked after is returning to their home, we will consider what support we can offer & ensure as a minimum that the YP has a person, that they trust, who they can talk to or share their concerns with.

### **Technologies**

Technological hardware & software is developing continuously with an increase in functionality of devices that people use. The majority of YP use online tools to communicate with others locally, nationally & internationally. Access to the Internet & other tools that technology provides is an invaluable way of finding, sharing & communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable & to abuse them.

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

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation & extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising & adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending & receiving explicit images (e.g. consensual & non-consensual sharing of nudes & semi-nudes &/or pornography, sharing other explicit images & online bullying; &

- **commerce:** risks such as online gambling, inappropriate advertising, phishing & or financial scams.

### **Online Safety & Social Media**

With the current speed of on-line change, some parents have only a limited understanding of online risks & issues. Parents may underestimate how often their YP come across potentially harmful & inappropriate material on the internet & may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint
- accessing & generating inappropriate content

In recognition of this, the Organisation will provide training to YP & parent, as & when a need is recognised & however, appropriate for the YP/Parent.

### **Cyberbullying**

Central to the Organisation's Tackling Bullying policy is the principle that '*bullying is always unacceptable*' & that '*all YP have a right not to be bullied*'.

The Organisation also recognises that it must take note of bullying perpetrated outside Organisation which has an impact within the Organisation; therefore, once aware we will respond to any cyber-bullying carried out by YP when they are away from the centre.

Cyber-bullying is defined as '*an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.*'

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile 'phones
- The use of mobile 'phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The Organisation will pass on information to the police if it feels that it is appropriate or is required to do so.

### **Sexting**

'Sexting' often refers to the sharing of naked or 'nude' pictures or video through mobile phones &/or the internet. It also includes underwear shots, sexual poses & explicit text messaging is it sometimes referred to as youth produced sexual imagery.

While sexting often takes place in a consensual relationship between two young people, the use of sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation & take place between strangers.

As the average age of first smartphone or camera enabled tablet usage for a child is 6 years old, sexting is an issue that requires awareness raising across all ages.

Parents should be aware that they can come to the Organisation for advice.

### **On-line sexual abuse**

As an Organisation we will:

- **Report** to the police, Child Exploitation & Online Protection command (CEOP) or any other relevant body any on-line sexual abuse or harmful content we are made aware of. This could include sending abusive, harassing & misogynistic messages; sharing nude & semi-nude images & videos; & coercing others to make & share sexual imagery. We will seek guidance from the NPCC '[when to call the police](#)' document & the internet watch foundations '[report harmful content](#)' website
- **Educate** to raise awareness of what on-line sexual abuse is, how it can happen, how to limit the impact & what to do if you become aware of it.
- **Support** victims of on-line abuse within the Organisation community

### **Gaming**

Online gaming is an activity in which the majority of YP & many adults get involved & it's the main area of our business. The Organisation will:

- Identify which games are appropriate for the YP to play when in the centre
- Highlight any concerns with game playing if identified
- If requested support parents in identifying the most effective way to safeguard their YP by using parental controls & child safety modes

### **Online reputation**

Online reputation is the opinion others get of a person when they encounter them on-line. It is formed by posts, photos that have been uploaded & comments made by others on people's profiles. It is important that YP & staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations & work establishments now check digital footprint before considering applications for positions or places on courses.

### **Grooming**

On-line grooming is the process by which one person with an inappropriate sexual interest in YP will approach a child on-line, with the intention of developing a relationship with that YP, to be able to meet them in person & intentionally cause harm.

The Organisation will build awareness amongst YP & where applicable, parents about ensuring that the YP:

- Only has friends on-line that they know in real life
- Is aware that if they communicate with somebody that they have met on-line, that relationship should stay on-line.

That the Organisation will support parents as applicable to:

- Recognise the signs of grooming
- Have regular conversations with their YP about on-line activity & how to stay safe on-line

The Organisation will raise awareness by:

- Building it into conversation with YP whilst gaming

Additionally to being targeted for sexual motivations, some YP are also groomed online for exploitation or radicalisation. While the drivers & objectives are different, the actual process is broadly similar to radicalisation, with the exploitation of a person's vulnerability usually being the critical factor. Those who are targeted are often offered something ideological, such as an eternal spiritual reward, or

sometimes something physical, such as an economic incentive, that will make them 'feel better' about themselves or their situation.

Anyone can be at risk. Age, social standing & education do not necessarily matter as much as we previously thought, & we have seen all kinds of people become radicalised, from young men & women with learning difficulties to adults in well-respected professions. What is clear is that the more vulnerable the person, the easier it is to influence their way of thinking.

Signs of grooming can include:

- isolating themselves from family & friends;
- becoming secretive & not wanting to talk or discuss their views;
- closing devices down when others are around;
- refusing to say who they are talking to; using technology such as anonymous browsing to hide their activity; &
- sudden changes in mood, such as becoming angry or disrespectful.

Of course, none of these behaviours necessarily mean someone is being radicalised &, when displayed, could be a symptom of bullying or other emotional issues.

## **Part 2 – Safeguarding issues relating to individual Young People's needs**

### **Homelessness**

We recognise that being homeless or being at risk of becoming homeless presents a real risk to a YP's welfare. The impact of losing a place of safety & security can affect a YP's behaviour & attachments.

In line with the Homelessness Reduction Act 2017, this Organisation will promote links into the Local Housing Authority for the parent in order to raise/progress concerns at the earliest opportunity.

We recognise that whilst referrals &/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, & should not, replace a referral into children's social care or SAB as applicable where a YP has been harmed or is at risk of harm.

### **Young People & the Court System**

We recognise that YP are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience & therefore the Organisation will aim to support YP through this process.

Along with pastoral support, the Organisation will use age-appropriate materials published by HM Courts & Tribunals Services (2017) that explain to YP what it means to be a witness, how to give evidence & the help they can access.

<https://insidehmcts.blog.gov.uk/2023/04/27/improving-support-for-children-going-to-court-as-witnesses/>

We recognise that making child arrangements via the family courts following separation can be stressful & entrench conflict in families. This can be stressful for YP. This Organisation will support YP going through this process if appropriate.

Alongside pastoral support this Organisation will use online materials published by The Ministry of Justice (2018) which offers YP information & advice on the dispute resolution service if appropriate.

These materials will also be offered to parents & carers if appropriate.

### **Young People with family members in prison**

YP who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation & poor mental health.

This Organisation aims to:

- understand & respect the YP's wishes. We will respect the YP's wishes about sharing information. If other YP become aware, the Organisation will be vigilant to potential bullying or harassment
- We will maintain good links with the remaining caregiver, if appropriate in order to foresee & manage any developing problems.
- Be sensitive in sessions- the Organisation will consider the needs of any YP with an imprisoned parent/caregiver during session planning
- Provide extra support. We recognise that having a parent in prison can attach a real stigma to a YP, particularly if the crime is known & serious. We will provide support & mentoring to help a YP work through their feelings on the issue if applicable.

Alongside pastoral care the Organisation will use the resources provided by the National Information Centre on Children of Offender in order to support & mentor YP in these circumstances.

### **Young People with medical conditions (in the Organisation)**

We will ensure that sufficient staff are trained to support any YP with a medical condition.

All relevant staff will be made aware of the condition to support the YP & be aware of medical needs & risks to the YP.

An individual healthcare plan may be put in place to support the YP & their medical needs.

Where a YP has an Education Health & Care Plan (EHCP), this is often central to our session planning but will otherwise be taken into account.

### **Young People with medical conditions (out of Organisation)**

There will be occasions when YP are temporarily unable to attend our Organisation because of their medical needs. These YP are likely to be:

- YP suffering from long-term illnesses
- YP with long-term post-operative or post-injury recovery periods
- YP with long-term mental health problems (emotionally vulnerable)

### **Special educational needs & disabilities (SEND)**

YP who have SEND can have additional vulnerabilities when recognising abuse & neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood & injury relate to the child's disability without further exploration
- The potential for a disproportionate impact on children with SEND, for example by behaviours such as bullying, without outwardly showing any signs
- Communication barriers & difficulties in overcoming these barriers
- Having fewer outside contacts than other children
- Receiving intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour & make it more difficult to set & maintain physical boundaries
- Having an impaired capacity to resist or avoid abuse
- Having communication difficulties that may make it difficult to tell others what is happening
- Being inhibited about complaining for fear of losing services
- Being especially vulnerable to bullying & intimidation
- Being more vulnerable than other children to abuse by their peers.

We will respond to this by:

- Making it common practice to enable YP with SEND to make their wishes & feelings known in respect of their care & treatment

- Ensuring YP with SEND know how to raise concerns & give them access to a range of adults with whom they can communicate. This could mean using interpreters & facilitators who are skilled in using the YP's preferred method of communication
- Recognising & utilising key sources of support including staff in Organisations, friends & family members where appropriate

Further information from the DfE can be found:

[SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/send-code-of-practice-0-to-25-years)

[Supporting pupils with medical conditions at school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/supporting-pupils-with-medical-conditions-at-school)

Hampshire SENDIASS: [Hampshire \(councilfordisabledchildren.org.uk\)](https://www.councilfordisabledchildren.org.uk)

[Mencap](https://www.mencap.org.uk) - Represents people with learning disabilities, with specific advice & information for people who work with children & young people

[www.PDASociety.org.uk](https://www.pdasociety.org.uk)

## Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a YP has suffered or is at risk of suffering abuse, neglect or exploitation.

The balance between the risk & protective factors is most likely to be disrupted when difficult events happen in YP's lives. These include:

- **loss or separation** – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted
- **life changes** – such as the birth of a sibling, moving house or changing schools or during school transitions & transitions between alternative providers
- **traumatic events** such as abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster

When concerns are identified, Organisation staff will provide opportunities for the YP to talk or receive support within the Organisation. The Organisation will communicate sensitively with the YP's parent, school or LA as applicable to that YP.

Where the needs require additional professional support, referrals will be made to the appropriate team or service with the appropriate agreement.

If staff have a mental health concern about a YP that is also a safeguarding concern, they will take immediate action, raising the issue with the designated safeguarding lead or a deputy.

## Part 3 – Other safeguarding issues that may potentially have an impact on Young People

### Bullying

The Organisation has a separate *Tackling Bullying Policy & Procedures*

### Prejudice-based abuse

Prejudice-based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice-based on a person's real or perceived:

- Disability
- Race
- Religion
- Gender identity
- Sexual orientation

Although this sort of crime is collectively known as 'Hate Crime' the offender does not have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language
- hate graffiti (e.g. on Organisation furniture, walls or books)
- provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic
- verbal abuse
- inciting hatred or bullying against pupils who share a protected characteristic
- prejudiced or hostile comments in the course of discussions within lessons
- teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background
- refusal to co-operate with others because of their protected characteristic, whether real or perceived
- expressions of prejudice calculated to offend or influence the behaviour of others
- attempts to recruit other pupils to organisations & groups that sanction violence, terrorism or hatred.

We will respond by:

- clearly identifying prejudice-based incidents & hate crimes & monitor the frequency & nature of them within the Organisation
- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the Organisation & local community
- ensuring that staff are familiar with formal procedures for recording & dealing with prejudice-based incidents & hate crimes
- dealing with perpetrators of prejudice-based abuse effectively
- supporting victims of prejudice-based incidents & hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying & prevent it happening again

### **Drugs & substance misuse**

If a YP is suspected of being under the influence of drugs or alcohol at the Centre, the Organisation must prioritise the safety of the YP & those around them. If necessary, it should be dealt with as a medical emergency, administering First Aid & summoning appropriate support. Depending on the circumstances, parents or the police may need to be contacted. If the YP is felt to be at risk this Policy will come into effect & social services may need to be contacted.

### **Faith Abuse**

The number of known cases of child abuse linked to accusations of 'possession' or 'witchcraft' is small, but YP involved can suffer damage to their physical & mental health, their capacity to learn, their ability to form relationships & to their self-esteem.

Such abuse generally occurs when a carer views a YP as being 'different', attributes this difference to the YP being 'possessed' or involved in 'witchcraft' & attempts to exorcise him or her.

A YP could be viewed as 'different' for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer & the YP.

There are various social reasons that make a YP more vulnerable to an accusation of 'possession' or 'witchcraft'. These include family stress &/or a change in the family structure.

The attempt to 'exorcise' may involve severe beating, burning, starvation, cutting or stabbing & isolation, & usually occurs in the household where the YP lives.

If the Organisation becomes aware of a YP who is being abused in this context, the DSL will follow the normal referral route to children's social care or SAB as applicable.

### **Gangs & Youth Violence**

The majority of YP will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.

We have a duty & a responsibility to protect our YP. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment.

Primary schools are increasingly recognised as places where early warning signs that younger children may be at risk of getting involved in gangs can be spotted. Crucial preventive work can be done within schools to prevent negative behaviour from escalating & becoming entrenched.

We will:

- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour
- understand risks for specific groups, including those that are gender-based, & target interventions
- safeguard, & specifically organise child protection, when needed
- make referrals to appropriate external agencies
- carefully manage individual transitions between educational establishments especially into other alternative provision

### **Private fostering**

Private fostering is an arrangement by a YP's parents for their YP (under 16 or 18 if disabled) to be cared for by another adult who is not closely related & is not a legal guardian with parental responsibility, for 28 days or more.

It is not private fostering if the carer is a close relative to the YP such as grandparent, brother, sister, uncle or aunt.

The Law requires that the carers & parents must notify the Children's Services Department of any private fostering arrangement.

If the Organisation becomes aware that a YP is being privately fostered, we will inform the Children's Services Department & inform both the parents & carers that we have done so.

## **Part 4 –Safeguarding processes**

### **Safer Recruitment**

The recruitment process checks the identity, criminal record (enhanced DBS), mental & physical capacity, right to work in the U.K., professional qualification & seeks confirmation of the applicant's experience & history through references.

As an employer we follow safer recruitment guidance as set out in the current Keeping Children Safe in Education. Please refer to the *Recruitment & Selection Policy & Procedures*

### **Staff Code of Conduct**

When working with YP for the Organisation, all staff & volunteers are acting in a position of trust. It is important that you are aware that you may be seen as role models by YP & therefore, you must always dress & act in a safe & appropriate manner.

When working with YP people, it is important to:



- ✓ Operate within the Organisation's Policies & Procedures as they are written in accordance with relevant laws & guidance;
- ✓ Always listen to & respect YP;
- ✓ Avoid favouritism;
- ✓ Treat YP fairly & without prejudice or discrimination;
- ✓ Value & take YP's contributions seriously, actively involving YP in planning activities wherever possible;
- ✓ Ensure any contact with YP is appropriate & in relation to the work of the project;
- ✓ Always ensure language is appropriate & not offensive or discriminatory, regardless of the language the YP may use;
- ✓ Follow the e-safety policy & report any breaches;
- ✓ Always ensure equipment is used safely & for its intended purpose;
- ✓ Provide examples of good conduct you wish YP to follow;
- ✓ Carefully challenge unacceptable behaviour or request support from a senior member of staff & report all allegations/suspicions of abuse;
- ✓ Ensure that whenever possible, there is more than one adult present during activities with YP or if this is not possible, that you are within sight or hearing of other adults; (see Lone Working procedure when working one to one)
- ✓ Be close to where others are working. If a YP specifically asks for or needs some private time with you, ensure other staff should know where you & the YP are;
- ✓ Respect a YP's right to personal privacy;
- ✓ Encourage YP & adults to feel comfortable & caring enough to point out attitudes or behaviour they do not like;
- ✓ Recognise that special caution is required when you are discussing sensitive issues with YP; many YP who attend our Company will openly discuss topics that are not age-appropriate or overshare.

You must not:

- X Patronise or treat YP as if they are silly;
- X Allow allegations to go unreported;
- X Develop inappropriate relationships such as contact with YP that is not a part of the work of the Organisation or agreed with the manager(s);
- X Have contact with young people through social media other than that agreed by the manager(s) e.g. distance learning.
- X Conduct a sexual relationship with a YP or indulge in any form of sexual contact with a YP. Any such behaviour between an adult member of staff or volunteer & a YP using the services of the Organisation represents a serious breach of trust on the part of the staff member or volunteer & is not acceptable under any circumstances;
- X Let YP have your personal contact details (mobile number or address);
- X Make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of YP;
- X Act in a way that can be perceived as threatening or intrusive;
- X Make inappropriate promises to YP, particularly in relation to confidentiality;
- X Jump to conclusions about others without checking facts;
- X Either exaggerate or trivialise child abuse issues;
- X Rely on your reputation or that of the Company to protect you.

## Training

The DSL or their deputy will provide all new staff with training to enable them to both fulfil their role & also to understand & follow the *Young Person Protection Policy & Procedures*, this *Safeguarding Policy*, the *Employee Handbook*, & part one of *Keeping Children Safe in Education*. This induction may be covered within the termly training if this falls at the same time; otherwise, it will be carried out separately during the initial starting period.

## Health & Safety

There is a requirement that all Organisations must have a policy that details the organisation, roles & responsibilities & arrangements in place at the premise for the managing & promoting of Health & Safety in accordance with the Health & Safety at Work act 1974 & regulations made under the act.

Organisations must assess all their hazards & record any significant findings along with what control measures are required. The plans should wherever possible take a common sense & proportionate approach with the aim to allow activities to continue rather than preventing them from taking place.

*Please refer to the Health & Safety, Fire, First Aid & Medical Needs, Risk Assessments Policies & Procedures.*

### **Site Security**

We aim to provide a secure site but recognise that the site is only as secure as the people who use it. Therefore, all people on the site have to adhere to the rules which govern it. These are:

- The main doors are kept locked to prevent intrusion
- Internal doors accessed from reception are key-pad entry
- Only members of staff have key fobs
- Visitors & volunteers can only enter the building if let in by a member of staff & they must sign in
- Visitors & volunteers must be chaperoned by a member of staff at all times (if using the toilets, staff are to check there are no YP using the facilities first & then wait outside)
- YP are only allowed out of the building with adults/carers with agreed responsibility
- The main door is monitored by CCTV at all times

### **Off site visits**

A particular strand of health & safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the centre can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity or a visit involving adventure activities, a specific assessment of significant risks must be carried out. Please refer to the *Lone Working Policy & Procedures* Appendix 2 of the *Health & Safety Policy & Procedures* & the *Risk Assessment Policy & Procedures*.

### **First Aid**

Please refer to the *First Aid & Medical Needs Policy & Procedures*

### **Physical Contact & Intervention**

Most of the YP attending our Organisation will have sensory differences. This may include poor proprioception (interpreting where our body is in space) &/or vestibular (movement & balance) processing. They may be more tactile than other YP, have a different understanding of personal boundaries, need more hugs &/or want to engage in horseplay. Staff will review each young person's documentation – *Student Profile, EHCP, Risk Assessment* & receive individual guidance both before a session & have access to senior staff for advice during & after sessions, to keep everyone safe.

Our *Positive Interactions Policy & Procedures* outlines more detail on how to ensure our YP remain calm within our Organisation & our policy on when & how to use physical intervention to protect them from harm.

### **Taking & the use & storage of images**

We will seek consent from the YP, parent/carer of a YP & from their responsible other adults before taking & publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in Organisation publications, printed media or on electronic publications.

We will not seek consent for photos where you would not be able to identify the individual.

We will seek consent for the period the YP remains registered with us &, unless we have specific written permission, we will remove photographs after a YP (or staff member) appearing in them leaves the Organisation or if consent is withdrawn.

Photographs will only be taken on Organisation owned equipment & stored on the Organisation network. No images of YP will be taken or stored on privately owned equipment by staff members.

CCTV imaging is used throughout the centre for the purposes of safety & posters alert YP, staff & visitors to this.

Please refer to the *Data Protection & GDPR Policy & E-Safety Policy*

### **Disqualification under the childcare act**

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare.

We will check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.