



SAFEGUARDING & PREVENT POLICY

January 2023

SAFEGUARDING AND PREVENT POLICY. V4 August 2022

This document sets out the Citrus Training Ltd. policy and procedures with regard to the safeguarding of children and vulnerable adults.

KEY INDIVIDUALS INVOLVED IN DEVELOPING THE PROCESS AND POLICY.

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CIRCULATED TO THE FOLLOWING INDIVIDUALS FOR COMMENTS AND APPROVAL.

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DRAFT AND ISSUE INFORMATION

SUBJECT/TOPIC	COMMENTS
Date sent for review	JF, CW, NS 06/12/2021
Date approved	07/12/2021
Approved by	WT, CW
Date of issue	7 th December 2021
Date for review	12 months unless other period required by legislation etc
Where documents available and stored	Z:\Safeguarding and Prevent
Scope of policy	All Staff
Feedback on implementation and content to	Dani Small – Apprenticeship Programme Manager & Designated Safeguarding Lead

Signed:



Date: 05/08/2022

Wayne Taylor
(Managing Director)

VERSION CONTROL AND SUMMARY OF CHANGES.

VERSION NUMBER	DATE	COMMENTS (DESCRIPTION OF CHANGE AND/OR AMENDMENTS)
1.0	January 2019	Introduction of policy.
2.0	August 2021	Update to Policy to incorporate Prevent Policy and Procedure of making a referral
3.0	December 2021	Update to change renewal of policy from 2 years to 12 months
4.0	August 2022	Update staff names (key individuals and circulation list) and update company details to remove HRTD.

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1.0. INTRODUCTION

1.1. Citrus Training Ltd. [The Company] is committed to ensuring the safety and physical and emotional wellbeing of its learners, clients, staff, contractors and visitors.

1.2. This policy applies to safeguarding concerns regarding any registered student/learner, client, staff member, contractor or visitor at any Citrus Training Ltd. company.

1.3. The term 'safeguarding' is used to refer to a number of areas of concern relating to children or vulnerable adults, including:

- Child protection issues;
- Sexual exploitation;
- Radicalisation;
- Physical abuse or neglect;
- Emotional abuse or neglect.

Further examples of safeguarding concerns are provided in clause 3.

1.4. The Company recognises that in the course of fulfilling their duties, members of staff and contractors will come into contact with children and vulnerable adults.

1.5. The Company is committed to ensuring that it is able to fulfil its responsibilities in safeguarding any children or vulnerable adults who may be at risk of harm or exploitation.

1.6. This policy is consistent with the following legislation or statutory guidance:

- The Education Act (2002)
- The statutory guidance 'Keeping Children Safe in Education (2018)'
- Northamptonshire Safeguarding Children's Board (NSCB) procedures and guidance for safeguarding.
- The Health and Safety at Work Act (1974)
- The Children Act (2014)
- The Children Act (2004)
- The Children and Social Work Act (2017)
- The Safeguarding Vulnerable Groups Act (2006)
- General Data Protection Regulations (GDPR) and Data Protection Act(2018)
- The Safeguarding Vulnerable Groups Act (2006)
- The Protections of Freedom Act (2012)
- The Counter Terrorism and Security Act (2015)

1.7. The Company recognises that it has a duty to report suspected safeguarding concerns relating to a child or vulnerable adult to relevant external agencies, if that

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concern is reported to, or identified by, a member of staff or a contractor in the course of their duties.

1.8. The Company will ensure that there is a Designated Safeguarding Lead (DSL) who has lead responsibility for safeguarding and child protection and ensure that this person has the appropriate training to fulfil their duties. The DSL's responsibilities include:

- Implementing and promoting this policy;
- Ensuring the policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and vulnerable adults
- Ensuring that staff are trained in relevant safeguarding procedures and are competent in fulfilling their duties
- Ensuring appropriate and adequate resources are available in order that The Company is able to meet its safeguarding responsibilities

1.9. The Company will ensure that all relevant staff receive information and advice on safeguarding issues as appropriate for their role within The Company.

1.10. The Company will ensure it has appropriate procedures in place to check the suitability of staff and contractors whose responsibilities involve close, unsupervised contact with children or vulnerable adults.

1.11. The Company will ensure that it makes appropriate support available to staff who receive disclosures of safeguarding issues.

2.0. DEFINITIONS

2.1. The following definitions apply to this policy.

KEY TERM	DEFINITION
The Company	Citrus Training Ltd.
All staff/employees	All Citrus Training Ltd. employees regardless of which department they work for.
Child	A person who is under the age of 18.
Vulnerable Adult	An individual over the age of 18 who lacks the capacity to take care of him or herself (i.e. at risk of neglect) and/or who may be unable to keep him or herself safe from the risk of significant harm, abuse or exploitation.
Safeguarding	Protecting children and vulnerable adults who may be at risk of exploitation, harm, neglect or abuse.
PREVENT	Duty on specified authorities to have a due regard to the need to prevent people from being drawn into terrorism.

3.0. EXAMPLES OF POTENTIAL SAFEGUARDING CONCERNS

3.1. The following are examples of the types of situations which may present a safeguarding concern. This list is not exhaustive, and staff will need to exercise their professional judgement in determining if there are safeguarding concerns which need to be taken into consideration. Staff can also seek advice from the DSL:

- A child or adult raises an allegation of abuse, harm, neglect or other inappropriate behaviour.
- A learner, staff member, contractor or visitor discloses information involving themselves, family members or any other child or adult which indicates that an individual may be harming or abusing a child or vulnerable adult.
- There are suspicions or indications that a child or vulnerable adult is being abused or harmed, or is at risk of exploitation, harm, neglect or abuse. Advice on recognising the signs is available at <https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>.
- There are observable changes in a child or vulnerable adult's appearance or behaviour that may be related to exploitation, harm or abuse.
- A concern is raised that an individual presents a risk of abuse or harm towards a child or vulnerable adult. If this concern relates to a member of staff, a contractor or a learner presenting a risk, the Company will carry out a risk assessment and, if appropriate, invoke other appropriate policies, including its disciplinary procedures.
- Concerns arise that a learner or member of staff is vulnerable to radicalisation and there is an identifiable risk of the individual being drawn into terrorism.
- A historic disclosure of sexual or physical abuse is made, where the perpetrator has access to children or vulnerable adults.

3.2. The following incidents MUST always be reported to the Designated Safeguarding Lead:

- If a child or vulnerable adult is accidentally hurt;
- If you are concerned about a relationship that is developing with a child or vulnerable adult, which could represent an abuse of trust;
- If you are concerned that a child or vulnerable adult is becoming attracted to you;
- If you are concerned that a colleague is becoming attracted to a child or a vulnerable adult;
- If a child or vulnerable adult misunderstands or misinterprets something you have done and believes your actions to be abusive or harmful;
- If you have to use reasonable physical restraint to prevent a child or vulnerable adult from harming themselves or another, or from causing significant damage to property;
- If a child or vulnerable adult reports concerns regarding forced marriage or Female Genital Mutilation (FGM).

4.0. KEY SAFEGUARDING PRINCIPLES

4.1. The Company will take all safeguarding concerns relating to children and vulnerable adults seriously, will consider concerns fully and will report any such concerns in a timely manner to the relevant person or authority.

4.2. Safeguarding referrals to the relevant authority will be made on the basis of identified and evaluated risk, as per the procedures outlined in Clause 6.

4.3. The Company will ensure that it maintains records of any safeguarding concerns and any referrals made as a consequence. All such records will be kept in accordance with The Company's Data Protection Policy.

5.0 PREVENT COMPANY ETHOS AND PRACTICE

5.1. As an organisation, we recognise that extremism and exposure to extremist materials and influences can lead to innocent individuals and/or groups being targeted, harmed and in extreme cases killed. We also recognise that if we fail to challenge extremist views, we are failing to protect our learners.

5.2. PREVENT is part of the Government counter-terrorism strategy. It is designed to tackle the problem of terrorism at its roots, preventing people from supporting terrorism or becoming terrorists themselves.

5.3. When staff are concerned about an individual or group, they should contact their Designated Safeguarding Lead, Dani Small on 0800 538 5293.

5.4. Channel is a multi-agency partnership that evaluates referrals of individuals at risk of being drawn into terrorism, working alongside safeguarding partnerships and crime reduction panels.² (prevent Strategy, Home office, 2011).

5.5. Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way. Therefore, at Citrus Training Ltd., we will provide a broad and balanced tutorial programme, delivered by skilled Tutors and support staff so that our students are enriched, understand and are tolerant of difference and diversity.

5.6. The Company are aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times students may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate dealt with in line with our company policies for both learners and staff.

- 5.7. As part of their wider safeguarding responsibilities, all staff will be alert to:
- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where students have not actively sought these out;
 - Graffiti symbols, writing or art work promoting extremist messages or images;
 - Learners accessing extremist material online, including through social networking sites;
 - Reports of changes in behaviour, friendship or actions and requests for assistance;
 - Partner organisations, local authority services, and police reports of issues affecting learners in other organisations or settings;
 - Learners voicing opinions drawn from extremist ideologies and narratives;
 - Use of extremist or hate crime terms to exclude others or incite violence;
 - Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
 - Attempts to impose extremist views or practices on others;
 - Anti-Western or Anti-British views.

5.8. The Company will closely follow any locally agreed procedure as set out by the Local Authority and/or the Northamptonshire Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

6.0 RISK ASSESSMENT

6.1. As required by the Prevent Duty, the Company has carried out an assessment of the risk of our learners being drawn into extremism or terrorism. This risk assessment is reviewed at least annually by the Designated Safeguarding Lead.

7.0 STAFF TRAINING

7.1. The Company will carry out training on a regular basis for all relevant staff, so that they can recognise who are vulnerable of being drawn into terrorism and potential signs of radicalisation

8.0 IT NETWORKS

8.1. The Company considers it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism and will keep under regular review the possible use of filters as a means of restricting access to content covered by the Prevent Duty as part of our risk assessment process social media provides new avenues for the distribution and accessing of extremist material, and the Company takes the challenges presented by social media very seriously. If any misuse of the Company's branding on social media accounts is discovered, then

action will be taken in accordance with the terms and conditions of the relevant platform.

9.0 INFORMATION SHARING AND DATA PROTECTION

9.1. Where there are concerns about a learner being affected by extremism, radicalisation or terrorism, the sharing of information in a timely and effective manner between The Company and other relevant agencies can reduce the risk of harm.

9.2. Whilst the Data Protection Act (2018) places a duty on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in an individual being at risk of being affected by extremism, radicalisation or terrorism.

9.3. Human rights concerns, such as respecting the right to a private and family life, would not prevent sharing where there are real PREVENT related concerns.

9.4. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about the recording requirements, staff should discuss this with the Designated Safeguarding Lead.

9.5. The Company recognises that confidentiality should be maintained in respect of all matters relating to PREVENT. Information on individual concerns may be shared by the DSL with other relevant members of staff on a 'need to know' basis and where it is in the learner's best interests to do so.

10.0. WHISTLE BLOWING

10.1. Where there are concerns of extremism or radicalisation learners and staff will be encouraged to make use of our internal systems to 'Whistle Blow' or raise any issue in confidence. Staff can raise issues with their line manager under the Company's 'Whistleblowing' procedure as set out in the Employee Handbook. Learners can access the 'Whistleblowing' procedure in the Learner Handbook.

11.0. DISCLOSURE AND BARRING SERVICE (DBS) CHECKS

11.1. The Company will ensure that any staff or contractors working with children or vulnerable adults, or who have close, unsupervised contact with children or vulnerable adults, will have an appropriate DBS check carried out. This will usually be an enhanced check. The appropriate check will be made dependent on the individual's role

12.0. WHAT TO DO IF YOU HAVE CONCERNS ABOUT A CHILD OR VULNERABLE ADULT.

12.1. Citrus Training Ltd. follows the Northamptonshire Safeguarding Children Board (NSCB) guidelines for making referrals and all staff and contractors have a

responsibility to recognise concerns and take the necessary action by following these procedures.

12.2. If the child or vulnerable adult is in immediate danger, then call the police or, if they require emergency medical attention, you must seek medical advice without delay.

12.3. Staff will **immediately** report to the Designated Safeguarding Lead (DSL):

- Any suspicion that a child or vulnerable adult is injured, marked, or bruised in a way that is not readily attributable to what could be considered normal knocks and scrapes.
- Any explanation for injury given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child or vulnerable person may have suffered harm.
- Any concerns that a child or vulnerable person may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns that a child or vulnerable adult displays any signs or symptoms of abuse or neglect.
- Any significant changes in a child or vulnerable person's presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.
- Any concerns regarding person(s) who may pose a risk to children or vulnerable adults.

12.4. Staff will follow the process (Appendix 1) when responding to a disclosure/concern:

- All staff to recognise that those who disclose any information relating to a safeguarding issue, may do so with difficulty and may have made a careful choice as to whom they wish to speak to, Accordingly, all staff will handle disclosures with sensitivity.
- Such information cannot remain confidential and staff will immediately communicate what they have been told to the Designated Safeguarding Lead and make a record of the disclosure/concern.
- Staff **WILL**:
 - Stay calm and listen carefully.
 - Accept what is being said.
 - Allow the child or vulnerable adult to talk freely without interrupting or putting words into their mouth.
 - Only ask questions when necessary to clarify, do not investigate or ask leading questions and make sure questions are of an 'open' nature, e.g. 'Tell me...' 'Explain...' and 'Describe...' (TED).
 - Reassure the child or vulnerable adult, but do not make promises which it might not be possible to keep.
 - Do not promise confidentiality.
 - Emphasise that it was the right thing to tell someone.
 - Reassure them that what has happened is not their fault.

- Try to ensure that the child or vulnerable adult disclosing does not have to speak to another member of staff.
- Try not to show signs of shock, horror or surprise. Do not express feelings or judgements regarding any person alleged to have harmed the child or vulnerable adult.
- Explain what will happen next and who has to be told.
- Make a written record, which should be signed and include the date, time and your position in the Company.
- Do not include your opinion in the written record without stating that it is your opinion.
- Pass the information onto the DSL without delay.
- Consider seeking support for yourself and discuss your needs with the DSL or a Mental Health First Aider, as dealing with a disclosure can be distressing.

12.5. The Designated Safeguarding Lead (DSL), or their deputy in their absence, will take the following action when a disclosure or concern is reported to them:

- The DSL will first consider:
 - Any urgent medical needs of the child or vulnerable adult.
 - Discussing the matter with other agencies involved with the child or vulnerable adult and gathering information from other members of staff etc.
 - Consulting with other appropriate agencies, e.g. MASH.
 - The child or vulnerable adult's wishes, where appropriate.
- The DSL will then:
 - Decide whether to make a referral to MASH because a child or vulnerable adult is suffering, or is likely to suffer, significant harm and whether this should be undertaken immediately.
 - discuss a referral or concerns with MASH and record this discussion, along with any reasons identified for not notifying the parent or carers of the child or vulnerable adult before a referral is made.
 - Ensure that appropriate support is given to staff who have been involved in the disclosure of information that will have been upsetting.
 - Cooperate with any investigating agency's enquiries, as appropriate.
 - Consider employment issues and possible disciplinary action where the investigating agencies take no further action.
 - Ensure that they they follow the advice and guidelines from MASH or any other relevant agency related to the disclosure.

13.0. STAFF RECRUITMENT, TRAINING AND INDUCTION

13.1. Citrus Training is committed to safer practice in recruitment to ensure that there is a consistent and thorough process in place with regards to obtaining, collating, analysing and evaluating information regarding applicants to ensure that all persons appointed are suitable to work with Citrus Training's service users. The checking and vetting of potential employees is a critical part of this process.

Our Safer Recruitment Policy and procedure covers all activities that form part of the recruitment and selection of staff and associates, and these standards should be adhered to at all times when recruiting and selecting every member of staff. It is essential that any employee involved in any aspect of the recruitment and/or selection of staff and associates is aware of, and follows, this policy and procedure.

All organisations and individuals who work with children, young people or vulnerable adults, or are involved in providing services to them, have a duty to safeguard and promote their welfare. The adoption of safe recruitment practices and procedures is vital in identifying deterring and rejecting people unsuitable for working with these groups

A copy of the Safer Recruitment Policy is available on the company's shared drive [here](#) or you can obtain a copy from the HR department

- 13.2 All staff will be given safeguarding training appropriate to their roles:
- Designated Safeguarding Lead and deputies
 - All newly appointed staff will receive safeguarding training as part of the Induction programme.
 - Staff members will receive safeguarding updates via email or team meetings as appropriate. Updates are sent to relevant staff when required.

14.0. INFORMATION SHARING AND DATA PROTECTION

14.1. Where there are concerns about the safety of a child or vulnerable adult, the sharing of information in a timely and effective manner between The Company and other relevant agencies can reduce the risk of harm.

14.2. Whilst the Data Protection Act (2018) places a duty on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm.

14.3. Human rights concerns, such as respecting the right to a private and family life, would not prevent sharing where there are real safeguarding concerns.

14.4. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about the recording requirements, staff should discuss this with the DSL.

14.5. The Company recognises that confidentiality should be maintained in respect of all matters relating to safeguarding. Information on individual safeguarding actions may be shared by the DSL with other relevant members of staff on a ‘need to know’ basis and where it is in the child or vulnerable adult’s best interests to do so.

14.6. The Company will always undertake to share its intention to refer a child or vulnerable adult to Social Care with their parents/carers, unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, staff must consult with the MASH team (contact details below).

15.0. USEFUL CONTACTS AND FURTHER INFORMATION

CONTACT	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Dani Small – Apprenticeship Programme Manager Tel: 0800 538 5293 Email: safeguarding@citrustraining.co.uk
Multi-Agency Safeguarding Hub (MASH)	Tel: 0300 126 1000 Email: MASH@northamptonshire.gcsx.gov.uk Website: https://www3.northamptonshire.gov.uk/councilservices/children-families-education/help-and-protection-for-children/protecting-children-information-for-professionals/Pages/contact-early-help-support-MASH.aspx
Northamptonshire Safeguarding Children Board	Website: http://www.northamptonshirescb.org.uk/
NSPCC	Tel: 0808 800 5000 Email: help@nspcc.org.uk Website: www.nspcc.org.uk
Childline	Tel: 0800 1111 Website: www.childline.org.uk
Karma Nirvana (Forced Marriage and Honour Based Abuse)	Tel: 0800 5999 247 Website: www.karmanirvana.org.uk
Zinhiya Trust (FGM Support)	Tel: 0116 254 516 Email: zinhiya_trust@gmail.com
Department of Education guidelines for Keeping Children Safe in Education	Website: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741315/Keeping_Children_Safe_in_Education_2018_Part_One_14.09.18.pdf

16. EQUALITY IMPACT ASSESSMENT

EIA FOR IDENTIFICATION (ID) BADGE POLICY	
Stage 1	Complete Draft Policy
Stage 2	Review the policy/process against its relevance to equality, diversity and inclusion (i.e. will this policy/process potentially impact on the equal treatment of employees). If 'No' then no further action is required and please note below in the appropriate box and sign and date. If 'Yes' continue with Stage 3
Stage 3	Screen the policy/processes to ensure that it does not directly or indirectly discriminate against any protected characteristic. Use the table below to consider this and inform changes to the policy/process.
Stage 4	Make amendments to the policy or identify any actions required. Note below if changes have been made.

PROTECTED CHARACTERISTIC	IS THERE ANY POTENTIAL FOR DISCRIMINATION AGAINST THIS GROUP?	ACTIONS REQUIRED
Age	No	None
Disability	Potential for issues with visual impairment and dyslexia when completing relevant paperwork and/or reading this policy.	When required, ensure that additional support is given, i.e. provide forms in different fonts and/or colours. All forms to be designed to be completed electronically or in hard copy.
Gender reassignment	No	No
Marriage and civil partnership	No	None
Pregnancy & maternity	No	None
Race	No	None
Religion or Belief	No	None
Sex (gender)	No	None
Sexual Orientation	No	None

STATEMENT	COMMENTS	NAME	DATE
This policy/process does not impact on the equal treatment of employees.	Reviewed and measures in place to ensure equality is not impacted.	N Searle	4/8/21
Amendments to policy/process.	None required.	N Searle	4/8/21

17. FURTHER INFORMATION ON SPECIFIC SAFEGUARDING ISSUES

CHILDREN MISSING FROM EDUCATION

All staff should be aware that children and vulnerable adults 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 child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation 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 The Company's unauthorised absence and children missing from education procedures.

CHILD SEXUAL EXPLOITATION

Child sexual exploitation is a form of abuse where children are sexually exploited for money, power, or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends and girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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 and do not take part in education.

GOOD PRACTICE – INDIVIDUALS

- Recognise the symptoms and distinguish them from other forms of abuse
- Treat the child/young person as a victim of abuse
- Understand the perspective/behaviour of the child/young person and be patient with them
- Help the child/young person to recognise that they are being exploited

- Collate as much information as possible
- Share information with other agencies and seek advice/refer to Social Care

GOOD PRACTICE – ORGANISATIONS

- Ensure robust safeguarding policies and procedures are in place which cover CSE
- Promote and engage in effective multi-agency working to prevent abuse
- Work to help victims move out of exploitation
- Cooperate to enable successful investigations and prosecutions of perpetrators

CHILD CRIMINAL EXPLOITATION: COUNTY LINES

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹² should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by
- violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

DOMESTIC ABUSE

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases staff of The Company 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 services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. 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' VIOLENCE

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and

practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV 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 HBV, or already having suffered HBV.

ACTIONS

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers / tutors that requires a different approach (see following section).

FEMALE GENITAL MUTILATION (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for any person (regardless of their nationality or residence status) to:

- perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
- assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the
- Act); and
- Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident (section 3 of the Act).

FORCED MARRIAGE (FM)

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014. A FM is a marriage conducted without the valid consent of one or both parties, and where duress is

a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family).

This is very different to an arranged marriage where both parties give consent. FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

PREVENT

The Counter Terrorism & Security Act 2015.

The Act places a Prevent duty on specified schools to have "due regard to the need to prevent people from being drawn into terrorism". The education and childcare specified authorities in Schedule 6 to the Act are as follows:

- The proprietors of maintained schools, non-maintained special schools, maintained nursery schools, independent schools (including academies and free schools) and alternative provision academies, PRUs, registered early years providers, registered late years providers and some holiday schemes.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS AND COLLEGES

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- 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 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

It is important that all 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 offences under the Sexual Offences Act 2003/19 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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

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.

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

- sexual comments, such as: telling sexual 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 (staff 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.

It may include:

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

THE RESPONSE TO A REPORT OF SEXUAL VIOLENCE OR SEXUAL HARASSMENT

The initial response to a report from a child is important. 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.