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B2W Group Safeguarding Policy & Procedure
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B2W Group Safeguarding Policy & Procedure

Just IT Training Ltd

Policy Owners: Alison Dann/ Victoria Parker

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Statement

B2W Group incorporating JIT recognises our moral and statutory responsibility to safeguard and protect young people and adults at risk of harm in our care whether from crime, other forms of abuse or from being drawn into terrorism related activity. It applies to all aspects of our work and to everyone working for JIT, including governors, employees, contractors, freelance staff etc. It is essential that everybody working at JIT understands their safeguarding responsibilities. Hereinafter referred to as colleagues.

If we are delivering training as part of a subcontract, we will follow the Lead Contracts referral process for Safeguarding.

Relevant Legislation and Related Policies

This policy has been developed in accordance with the principles and guidance including:

- The Equality Act 2010
- Education and Training (Welfare of Children) Act 2021
- The Children's Acts 1989 and 2004
- Education and Skills Act 2008
- Mental Capacity Act 2005
- The Care Act 2014
- Education and Skills Act 2008
- Counterterrorism and Security Act 2015
- Keeping Children Safe in Education 2022
- Working Together to Safeguard Children 2018
- Prevent Duty Guidance 2015
- Special Educational Needs and Disability Code of Practice 2015
- Safeguarding Disabled Children: Practice Guide 2009
- Voyeurism (Offences) Act 2019
- Safeguarding Vulnerable Groups Act 2006
- Guidance for safer working practice for those working in education settings 2019
- <https://www.cityoflondon.gov.uk/services/social-care-for-adults/safeguarding-adults>
- <https://saferlondon.org.uk/safeguarding-adults-policy-procedures/>
- <https://www.londonsafeguardingchildrenprocedures.co.uk/>
- <https://www.cityoflondon.gov.uk/services/children-and-families/child-protection>
- <https://www.cityoflondon.gov.uk/services/children-and-families/referrals>

Key Publications

- Further education and skills inspection handbook (2022)
- KCSIE 2022

Legal Definitions -For the purpose of this policy:

Children or young person

Applies to a person who is less than 18 years of age. For JIT this relates to our Apprenticeship learners that are aged between 16-18.

Adults at risk

Includes those who, because of mental health difficulties and/or physical health conditions and/or personal circumstances, may be vulnerable to abuse, exploitation, or significant harm. For JIT this relates to any learner who meets the criteria above on our Apprenticeship or Bootcamp programmes.

Safeguarding

Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity. This definition for safeguarding is further strengthened in Keeping Children Safe in Education (KCSIE 2022) to explicitly state that safeguarding includes "**preventing impairment to children's mental and physical health or development**". This is recognition of the impact of the Covid pandemic on a child's mental health and wellbeing. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the reporting process outline in this procedure. Governing bodies and proprietors should ensure they facilitate a whole group approach to safeguarding.

Radicalisation

Is the process by which a person comes to support terrorism and extremist ideologies. A vulnerable learner or colleague may be more susceptible to being drawn towards or being targeted by those involved in extremist ideology.

Policy Aims

- To demonstrate the B2W Group commitment with regard to safeguarding to learners, parents and colleagues.

- To provide an environment in which learners feel safe, secure, valued, respected and feel confident to, and know how to, approach colleagues.
- if they are experiencing difficulties, believing they will be effectively listened to.
- To raise the awareness of all colleagues of the need to safeguard learners, and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a structured framework and procedure which will be followed by all colleagues and subcontractors working on behalf of JIT in cases of suspected abuse ensuring consistent good practice across the B2W Group.
- To provide a systematic means of monitoring learners known, or thought to be at risk of harm, and ensure we, the B2W Group, contribute to assessments of need and support packages for those learners.
- To develop and promote effective working relationships with other agencies.
- To ensure that all colleagues working within the B2W Group, have been checked for their suitability, including, verification of their identity and qualifications, a satisfactory DBS check and a single central record is kept for audit.
- Using our Safeguarding procedures to share concerns and relevant information with agencies who need to know and involving learners and their parents and carers appropriately.
- Using procedures to manage any allegations against colleagues or employers appropriately.
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for our learners and colleagues, by applying health and safety measures in accordance with the law and regulatory guidance.
- Regularly review the policy, procedures and recording forms.

Prevention/Protection

We recognise that the B2W Group plays a significant role in the prevention of harm to learners by providing good lines of communication and an ethos of protection. The B2W Group community will therefore:

- Create a culture where sexual harassment and online sexual abuse are not tolerated, identify issues, and intervene early to better protect children and adults. All staff should be able to reassure victims 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 abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Work to establish and maintain an ethos where learners feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with learners e.g., through learner surveys and learner voice.
- Ensure that learners and colleagues know that there is a member/s of staff in JIT whom they can approach if they are worried or in difficulty.
- Include safeguarding across the induction process and opportunities which equip learners and colleagues with the skills they need to stay safe and know who to turn to for help.

Roles and Responsibilities

Colleagues

- Understand that it everyone's responsibility to safeguard and promote the welfare of learners and that they have a role to play in identifying concerns, sharing information and taking prompt action.
- To ensure the effective implementation of the Safeguarding procedure and Prevent Policy, all colleagues must work in partnership to protect all young people and vulnerable adults engaged in JITs recruitment, training, and support services.
- It is the responsibility of each colleague to ensure they are aware of, and adhere to, this policy and the rules and procedures relevant to them.
- Will refer any safeguarding concern to the safeguarding team or if necessary, where there is immediate risk to the learner, to the police or Social Services.
- Have a responsibility to provide a safe environment in which learners can learn
- Have read Keeping Children Safe in Education part one and the B2W Group Safeguarding Policy and Procedures.

Safeguarding Terms

The following should be considered when working with learners:

- Sexual abuse or inappropriate relationships- Peer on peer sexual abuse and harmful sexual behaviour.
- Sexual harassment- This can be a one-off incident or an ongoing pattern of behaviour.
- Physical and emotional abuse or neglect, including Female Genital Mutilation
- Exploitation, including financial, sexual, forced marriage or gang related activity
- Neglect
- Grooming behaviour
- Domestic violence
- Bullying, including cyber bullying, bullying in the training centre or the workplace
- Victimisation
- Self harm
- Inappropriate taking of and/or sharing of unsolicited photographs (sharing of nude/ semi-nude images and Up-skirting)
- Unsafe activities or environments
- Crime, including knife crime and gang related activity
- Trafficking

A full list of safeguarding terms with descriptors is available in safeguarding appendices and must be read in conjunction with this policy/procedure

Identifying Harm

Through our work with learners and employers, JIT colleagues are well placed to notice changes in behaviour and appearance which may be due to harm. These could include:

- The learner discloses that they are being harmed or are at risk of harm.
- Absence from training or work.
- Behavioural problems.
- Change in dress or physical appearance.
- Rewards, including unaccounted for money, expensive clothing or footwear or devices such as mobile phones.
- Contact with risky adults or environments.
- Reduced contact with, or becoming withdrawn from, friends or family.
- Substance abuse.

Identifying Radicalisation

Colleagues should also be vigilant to the signs of radicalisation. Radicalisation can be difficult to spot, but signs that may indicate that a learner or colleague is being radicalised include:

- Not adhering to/upholding the British Values of; Democracy, Rule of Law, Individual Liberty and Respect, Tolerance of different faiths and beliefs, and those with none,
- isolating themselves from family and friends and learning groups
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

Designated staff with responsibility for Safeguarding:

- The Designated Safeguarding Lead (DSL) is a senior member of staff from the B2W Group Board and takes lead responsibility for ~~safeguarding~~ safeguarding
- The B2W Group has a Deputy Designated Safeguarding Lead (DDSL) who is trained to the same standard as the DSL and oversees the running of the safeguarding team at JIT.
- JIT have 2 Deputy Safeguarding Officers who are appropriately trained and support the safeguarding function with day-to-day requests.
- All members of the safeguarding team carry out those functions necessary to ensure the ongoing safety and protection of learners by ensuring that:
- They will be available (during JIT Group hours) for staff, learners and parents to discuss safeguarding concerns. Out of hours (pm-6am) the safeguarding mailbox can be accessed and has an automatic reply set up with emergency details provided.

The safeguarding Team

Designated Safeguarding Lead (Group B2WCT/JIT)	Alison Dann Group Director of Quality and People	Telephone Number 0161 474 7603
Deputy Designated Safeguarding Lead	Vicki Parker Head of Quality	Telephone Number 020 3750 2147
Deputy Designated Safeguarding Officer	Peter Gilliland	Telephone Number 07944681929

Deputy Designated Safeguarding Officer	Caroline Onyema-Mathews	Telephone Number 07971494603
Deputy Designated Safeguarding Officer	Beatriz Lopez	Telephone Number 020 1346 4310
24 hour Safeguarding email-BeSafe@justit.co.uk		
Report all concerns via email immediately		

The B2W group Board oversees the implementation of this policy and the Prevent strategy/ action plans.

The Designated Safeguarding Lead has overall responsibility for Safeguarding and Prevent, including the following activities:

1. Ensuring that the policy and reporting procedure are monitored and reviewed in accordance with changes in related legislation and guidance.
2. Communicating the policy and reporting procedure to all colleagues and ensuring that they are provided with information, advice, and training on the protection of young people and vulnerable adults.
3. Acting as the main contact for the protection of young people and vulnerable adults.
4. Establishing and maintaining contacts with Local Authorities and the Police.
5. Maintaining confidential records of reported cases and the action taken.
6. Maintaining up to date knowledge on Safeguarding and Prevent issues.
7. Managing the Safeguarding and Prevent Action Plan.

Multi-agency working

B2W Group will work in line with statutory guidance Working Together to Safeguard Children by working with social care, police, health and other services to promote the welfare of learners and protect them from harm. This includes providing a coordinated offer of early help, contributing to inter-agency plans and providing additional help to children subject to child protection plans. The B2W Group will allow access to social care workers from the local authority, where appropriate.

Information sharing, GDPR and data protection

- GDPR/Data Protection Act places duties on organisations and individuals to process information, fairly and lawfully, and to keep the information they hold safe and secure. However, this is not a barrier to sharing information, where to not do so, would result in a learner being

placed at risk of harm.

- Information sharing is vital in identifying and tackling all forms of abuse.
- All colleagues must be aware that they cannot promise to keep a learner's secrets which might compromise their safety or well-being.
- Fears about sharing information cannot be allowed to stand in the way of promoting the welfare and protecting the safety of learners.
- The B2W Group recognises that matters relating to safeguarding are personal and will respect confidentiality.
- The Safeguarding Team will only disclose information about a learner to other members of staff on a need-to-know basis.

Use and Monitoring of IT

IT equipment provided to both colleagues and learners is subject to monitoring of its use. Filters will be applied to restrict access to harmful context and prevent people from being drawn into extremist behaviour. Inappropriate use of IT will be reported to a Safeguarding Officer.

Logging of Safeguarding Cause for Concerns

All cause for concerns received by the Safeguarding team will be recorded internally both on an individual tracking form in line with our internal process, as well as a Safeguarding Log. This is managed by the Designated Safeguarding Lead for audit and reporting purposes.

In accordance with GDPR, information contained within this log and within individual cause for concern forms will only be accessible to those individuals actively involved with the Safeguarding Team operations, or with Governance over Safeguarding. However, this data is also handled with "Keeping Children Safe in Education 2022" guidance which stipulates that "Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare and protect the safety of children". Therefore, should we be required to do so, the data contained within said documentation will be shared with relevant parties such as LADO (Local Authority Designated Safeguarding Officer), Prevent Channel, the Police and any other organisations/parties that we are duty bound to report to in light of Safeguarding and Prevent.

The Local Authority Designated Officer (LADO) has responsibility for coordinating the process of investigations, providing advice and guidance to the employer, to ensure that cases are dealt with as quickly as possible and consistently with a fair and thorough process. The Director of Quality and Performance, or in their absence/where the allegation relates to

them, the Directors, should consult the LADO directly. London's LADO can be contacted by calling 07795 090649. Or by Email: LADO@cityoflondon.gov.uk

The LADO will determine:

- whether it is an allegation or a complaint,
- if there is a need to undertake preliminary enquiries and, if so, how the enquiries should be conducted or,
- if the allegation meets the threshold for a Strategy Meeting to be convened
- whether immediate action to protect a child is required.

In the instance of a safeguarding allegation against the Directors, the Designated safeguarding leads **must** liaise directly with the **LADO**.

Preliminary enquiries should be made by the Designated safeguarding lead, after consultation with the **LADO**.

- Any initial enquiries should be minimal to establish the facts of the allegation if these were not established or were unclear at the time the original concern was raised, i.e., date, time, place of any alleged incident, any witnesses and other relevant factors.
- In-depth questioning of children or professionals/professional carers should not take place.
- Careful records should be made regarding any concerns or allegations and actions taken in response to these.
- When an allegation is made a number of inter-related elements will exist (Safeguarding, Criminal Investigation, Disciplinary, Complaints).
- Where a person has been dismissed as a result of the allegations, we are making a decision whether they are unsuitable to continue in their role with the organisation.
- B2W must refer the person to the Disclosure and Barring
- Service. A copy of the referral will be forwarded to the LADO for their records and the confirmation letter issued by the DBS will also be shared with the LADO.
- Where the person resigns prior to the conclusion of the investigation, the LADO process will continue and a referral to the DBS will be made where appropriate by the B2W.
- The Local Authority, on behalf of the Local Safeguarding Children Board, will,

therefore, have the key role in co-ordinating the relevant elements and ensuring that all subsequent stages of the Safeguarding Procedures are followed.

If any individual is unhappy that their concerns are not being taken seriously within B2W, they should raise their concerns with the Designated Safeguarding Lead and consultation with the LADO must take place.

Escalation of Cause for Concerns logged

In the event that a cause for concern is logged which indicates that an individual may be at serious risk of harming themselves or others, this will be immediately reported to the Group CEO and the Board. In the event this occurs, the following actions will take place:

- DSL to inform the CEO and Governing Safeguarding Lead.
- Designated Safeguarding Lead to facilitate a conference call to discuss the matter in full and steps to be taken (if required) to be agreed.
- Accountable Designated Safeguarding Officer to document all actions and co-ordinate.
- Accountable Designated Safeguarding Officer/ Lead to update CEO on actions appropriately until matter is closed.

Allegations against the DSL

- If a member of staff has an allegation against the DSL with regards to a safeguarding concern, the external safeguarding governor will investigate this fully, following the processes outlined above. The governor in charge of safeguarding is Michael Hunt and can be contacted confidentially via email at Michael@eta-gms.com

Code of Conduct for Colleagues

Colleagues are expected to take the following steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Avoiding any unnecessary physical contact with learners.
- Avoiding unaccompanied journeys with learners.
- Avoiding inappropriate familiarity with learners.
- Always acting upon and recording allegations or reports made by learners.
- Always reporting potential concerns.
- Not inviting learners to socialise with them or visit them at home.

- Not engaging with learners on social media.
- Recognising that it is a criminal offence to engage in sexual activity with a person under the age of 18 when in a position of power.

In appropriate cases and in accordance with the law, B2W has the right to report to the appropriate authorities any concerns it has that a colleague or learner ought to be included in a list of people who should be restricted from working with children and vulnerable adults.

How to Respond and Report

If you are made aware of any concerns or allegations, the following process should be followed:

- Remain calm and reassure the person that they have done the right thing in speaking up.
- Listen carefully and give the person time to speak.
- Do not voice an opinion.
- Do not ignore the concern or be judgmental or dismissive
- Explain that only professionals that need to know will be informed, but never promise confidentiality.
- Act immediately and don't try to address the issue yourself.
- Report the concern – alert a Safeguarding Officer to the concern directly in person/by telephone and then formally report the concern by email to BeSafe@justit.co.uk
- Complete a safeguarding referral form accessed via BeSafe@justit.co.uk
- Write a statement giving as much detail as possible, including date and time, what was said, any names or parties mentioned and how you responded.
- Do not make assumptions, consult with persons not directly involved in the situation or make promises.
- The Designated Safeguarding Lead will ensure that the relevant procedures are followed and will inform HR about any allegations
- The Designated Safeguarding Lead will inform the Local Authority Designated Officer in the first instance to determine if there is a genuine case for concern and a need for further action.
- In matters relating to radicalisation the Designated Safeguarding Lead will refer the matter (or seek advice from) the Prevent Lead, who in turn, may seek advice from the Local Authority's Channel Panel Chair or Police Prevent Lead.
- If the report is passed to authorities such as the Police for investigation, the Designated Safeguarding Lead will act as the main liaison officer and will ensure that relevant

colleagues are kept informed, including the Managing Director, and HR where a colleague is concerned.

- In the case of allegations against an B2W colleague, these must be reported to HR. B2W Training is required to report instances of misconduct or unsuitability to work with children or vulnerable adults to the Disclosure and Barring Service (DBS). This would generally apply when the colleague has been permanently suspended for reasons of misconduct or unsuitability to work with children or vulnerable adults.

Learners who are particularly Vulnerable

To ensure that all of our learners receive equal protection the safeguarding team will offer additional support and will give special consideration to those who are:

- Looked after children and previously looked after children
- On Child Protection Plans (For JIT, learners 16-18)
- Asylum seekers
- Young Carers
- Living away from home/private fostering
- Children in the court systems/YOT/ pending police investigations

If colleagues become aware of learners within these specific group, this information should be referred to the safeguarding team.

Relevant

- Whistleblowing Policy
- Health and Safety Policy

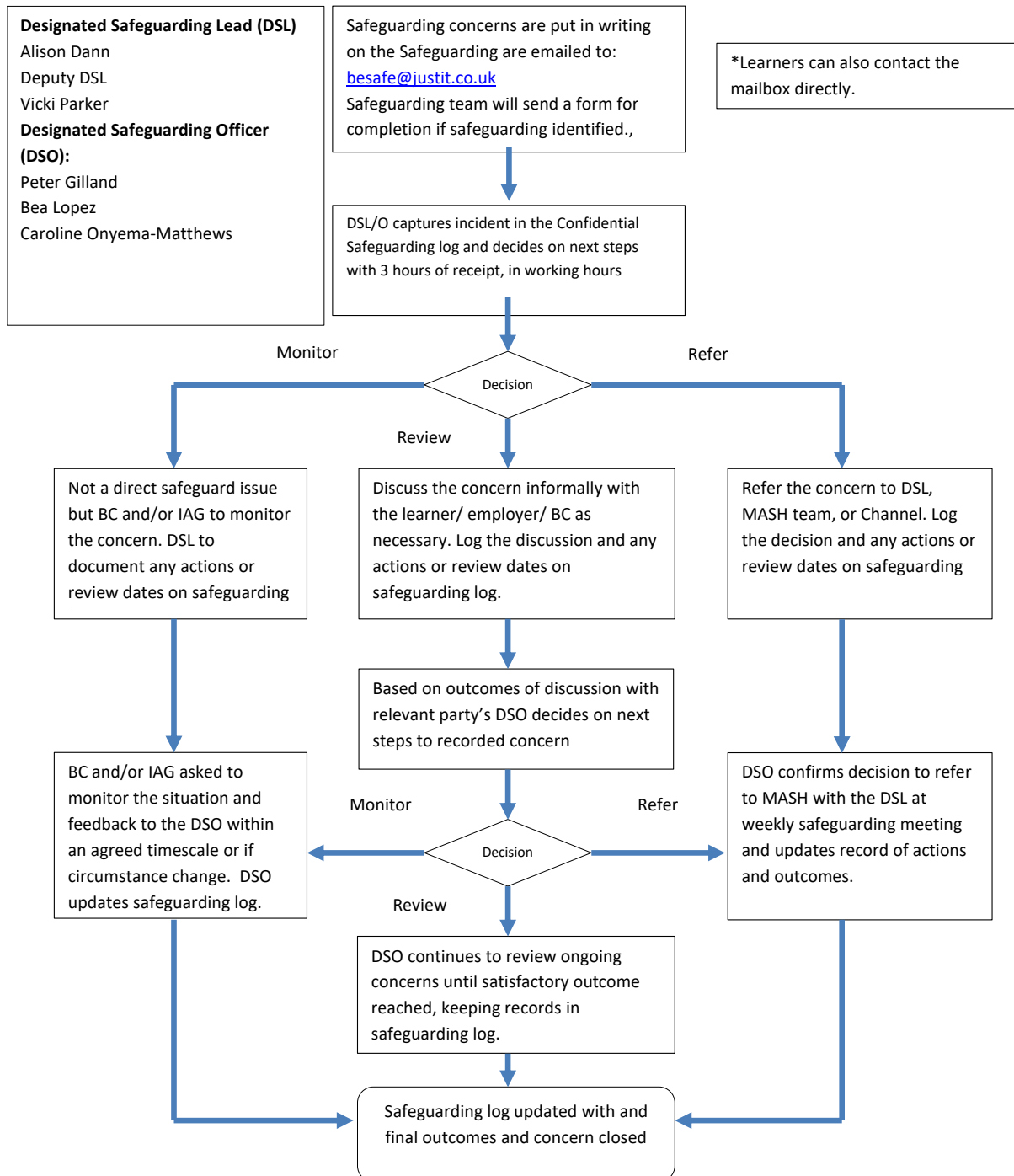
Safeguarding Procedure

The aim of this procedure is to provide a robust framework, to ensure that all colleagues take appropriate action when they are worried about a young person, adult at risk or colleague is at risk of abuse. It is the responsibility of all colleagues working within the B2W Group, to record and refer safeguarding concerns, even if they are just suspicions or overheard rumours, they should not be discussed this with anyone other than a member of the Safeguarding Team.

How to make a referral to the Safeguarding Team?

- Use the dedicated email service: **BeSafe@justit.co.uk** which will automatically be sent to the Safeguarding Team outlining in the message the key points that a safeguarding concern has been raised.
- Complete a safeguarding referral form online accessed via BeSafe@justit.co.uk
- Subcontractors- Refer to subcontractors procedure for reporting concerns.

FLOW CHART FOR RAISING SAFEGUARDING AND PREVENT CONCERNS



Pre-course Disclosures

- Any disclosures by potential learners relating to probation, spent or unspent convictions should be reported to the safeguarding team by emailing BeSafe@justit.co.uk.
- All colleagues must be alert to, and aware of the signs of abuse, these may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and colleagues need to take notice not only of major incidents but also other signs which may cause concerns.

Specified Safeguarding Issues include: (Appendix 1)

Child sexual exploitation (CSE)	Breast Ironing	Bullying/ Cyberbullying	Contextual Safeguarding
Child Criminal Exploitation: County Lines	Drugs	Domestic Violence	Upskirting
Fabricated or induced illness	Faith abuse	Female genital mutilation (FGM)	Peer on Peer
Forced marriage	Gender based violence	Honour based violence	Sexual Violence
Homelessness	Initiation/ hazing type violence and rituals	Mental health	
Private fostering	Radicalisation	Sexting	
Teenage relationship abuse: peer on peer	Modern slavery and trafficking	Children with family members in prison	

- Safeguarding Procedures **must be followed** whenever an allegation of abuse is made, or concern is expressed regarding the behaviour towards a child adult at risk or a colleague. It is important to note that under the Sexual Offences Act 2003 it is a criminal offence for a person

over the age of 18 in a position of trust to enter into a sexual relationship with any learner under 18 years of age, even if the relationship is consensual, or in the case of a learner over 18 years where the learner is vulnerable.

Wider safeguarding Concerns:

- *Colleagues should note that wider safeguarding concerns follow a different referral pathway and ensure they have read the related policies and procedures *

Individual need	Procedure/ who to contact
Bullying & Harassment	Refer to manager, who will ensure that incidents are dealt with in a consistent manner. If behaviour is extreme manager will report to safeguarding team for advice about whether external agencies need to be involved. Behaviour – negatively effecting the learning and wellbeing of others
Behaviour – negatively effecting the learning and wellbeing of others	Will be dealt with by manager under the disciplinary policy
Mental Health	If behaviour is extreme manager will report to safeguarding team for advice about whether external agencies need to be involved.
Pregnancy	If there is a safeguarding concern, colleagues are to follow safeguarding procedure.
	Manager to complete risk assessment with learner and submit to HR.

<p>Violence/Aggressive Behaviour</p> <p>Illegal/Dangerous Items. (e.g. drugs, including 'legal highs') or something dangerous (e.g. knife).</p>	<p>Manager to invoke disciplinary and suspend learner if necessary</p>
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Safeguarding Appendices

Appendix One- Annex B KCSiE 2022

[Keeping children safe in education: information for all school and college staff \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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Child abduction and community safety incidents

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12-17-year-olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse

or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

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

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;

- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

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

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

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

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

Modern Slavery and the National Referral Mechanism

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

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

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Operation Encompass

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

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

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

Homelessness

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

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties

shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

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

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. Actions If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e.

where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#). Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not

consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 32-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmf@fcdo.gov.uk.

Preventing radicalisation

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

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk

of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives. Statutory guidance on Channel is available at: Channel guidance.

Child on child abuse

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - sexual violence,⁶ such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch

themselves sexually, or to engage in sexual activity with a third party

- consensual and non-consensual sharing of nude and semi-nude images and/or videos⁸ (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
 - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims

are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Sexual violence

When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹³⁴ 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. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault). Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.¹

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16

- sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. 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. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
- sharing of unwanted explicit content or sexualised online bullying
- unwanted sexual comments and messages, including, on social media or sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

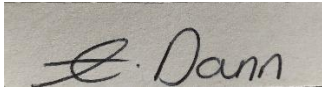
Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child

protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously.

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.



Date: 7th September 2022

Please return signed Policy to the Human Resources Department

1. Policy Versions and History

TITLE: B2W Group Safeguarding Policy and Procedure

Type:	Policy	Policy Version:	01	Directorate:	Board
Aim:	To safeguard and protect learners and staff, to foster a culture that ensures safeguarding is everyone's business.				
Scope:	Statutory Responsibilities				

CONTENT

Related documents:	As outlined in procedure.
Appendices:	KCSiE safeguarding terms to be read in conjunction with the policy/ procedure.
Ratified:	First updated edition based on safeguarding group function.
Date content initially created:	September 2022
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Responsibility for Implementation:	Alison Dann and Victoria Parker

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