



## **Safeguarding for All Policy**

### **Purpose**

The Inspire Education Group (IEG) is committed to a whole organisation approach to safeguarding and promoting the welfare of all its students, staff, volunteers, visitors, contractors and partners. Any reference in the policy to a child applies to all those aged under 18. The Group's legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone over the age of 18 who may, for a variety of reasons, require community services and/or be unable to protect him or herself from significant harm or exploitation.

### **Scope**

This policy applies to all students, including apprentices and particularly children, young people and vulnerable adults who may need support and all staff, volunteers, partners and families living and working across the Group: Peterborough College and Stamford College, University Centre Peterborough (UCP), other external facilities, in the workplace or distance learning. The Nursery is subject to separate policies and procedures.

To help ensure that children and adults at risk are protected from abuse, all complaints, allegations or suspicions will be taken seriously, following this policy detailed herein.

### **The Policy Statement**

The Group fully recognises its responsibility for safeguarding under the Education Act 2002, Care Act 2014, Apprenticeships, Skills, Children and Learning Act 2009 (as amended) and the Education and Training (Welfare of Children) Act 2021. The Group acknowledges its responsibility to adhere to other statutory guidance and bodies, including:

- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education statutory guidance \(July 2025\)](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [Working Together to Improve School Attendance \(2024\)](#)
- [Children's Social Care National Framework \(2024\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(2024\)](#)
- [Information sharing advice for safeguarding practitioners \(2024\)](#)
- [Behaviour in schools \(2024\)](#)
- [Guidance for Schools and Colleges: Gender Questioning \(2025\)](#)
- [Guidance for safer working practices for those working with children and young people in education settings \(2022\)](#)
- [NPCC When to Call the Police \(2020\)](#)
- [Preventing and Tackling Bullying, DfE \(2017\)](#)
- [Prevent Duty Guidance \(2024\)](#)
- [Prevent Duty guidance for further education revised \(2024\)](#)

**Policy Name:** SAF001 - Safeguarding for All Policy

**Policy Author:** Assistant Principal Student Experience and Support

**Issue:** September 2025

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**Site:** Inspire Insights, IEG Website, Student Hub



- [Prevent Duty Guidance Higher Education Revised \(2024\)](#)
- [Peterborough and Cambridge Safeguarding Board Multi-Agency Policies and Procedures'](#)
- [Lincolnshire Safeguarding Board](#)
- [Meeting digital and technology standards in schools and colleges, Filtering and monitoring standards for schools and colleges" \(2024\)](#)
- [Generative AI: product safety expectations \(2025\)](#)
- [Online Safety Act 2025](#)

Parents and carers are informed about our responsibilities via the IEG, UCP and college website and prospectus. A copy of this policy can be obtained on all websites.

## **Responsibilities**

Whilst overall responsibility for safeguarding children, young people and vulnerable adults is vested in the Group's Principal CEO and Chief Executive, the Group has named a Designated Safeguarding Lead (DSL) and deputies (DDSL) who are responsible for ensuring compliance with this policy and its procedures. The Nursery Manager is the DSL for the Nursery. The role, responsibilities and contact details of the DSLs can be found in Appendix 1. There is a member of the Governing Body with specific responsibility for safeguarding issues.

### **All members of the Group, including governance, have a responsibility to:**

- Know where this policy is located, have read and understood all associated procedures and appendices, including those on the local safeguarding board's website relating to Multi-Agency procedures, confirming annual compliance with this
- Read and understand Part 1 and the relevant Annexe of the DfE 'Keeping Children Safe in Education' 2025 statutory guidance for schools and colleges, confirming annual compliance with this
- Attend training from the point of induction, undertake annual refreshers and access key updates, keeping up to date with all mandatory safeguarding and Prevent training
- Contribute to the culture of safety, which promotes a positive, supportive and secure environment, including online, which provides all with a sense of respect and value. Acknowledging the importance of and showing professional curiosity
- Challenge instances of prejudice-related behaviour of staff and students, including but not limited to instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Fostering a culture that all forms of such abuse, including sexual violence/harassment, are unacceptable and will not be tolerated
- Know the name of the DSL / DDSL / Safeguarding Team members and their role, which includes overseeing the filtering and monitoring of safeguarding concerns and reporting of issues, throughout the college community, both online and offline
- Follow the recording and referral process for any concerns to the Safeguarding Team, recognising their responsibility in the Early Help process, and referrals to local authority social care to maximise the opportunity for timely intervention
- Understand that children and adults may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful

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- Ensure students know that there are trusted members of staff whom they can approach if they are worried about a safeguarding issue, and that their concerns will be taken seriously and acted upon as appropriate
- Never agree with a student to maintain confidentiality where there is a safeguarding concern
- Have an awareness of behaviours and associated dangers/risks linked to issues such as drug and alcohol misuse, unexplained and or persistent absences from home/care/education, family circumstances, seeing/hearing or experiencing the effects of domestic abuse and violence, online/social media activity and consensual and non-consensual sharing of nudes and semi-nudes
- Identify concerns early to prevent them from escalating; being alert to the signs and indicators of abuse and neglect, suspicions or disclosures of harm, extra-familial harm, risk of radicalisation, modern slavery, trafficking or exploitation, sexual abuse (including sexual harassment/violence and exploitation), domestic abuse in their intimate relationships (teenage relationship abuse), criminal exploitation, grooming, anti-social or criminal behaviour, serious youth violence and county lines
- Be aware that students can abuse other students, referred to as 'child-on-child' or 'peer-on-peer' abuse, and can manifest itself in many ways, including face-to-face, online or both concurrently
- Understand that students can be at risk of harm inside and outside the college community, within or outside the home environment and online
- Recognise that technology is a significant component in many safeguarding and well-being issues. Online peer-on-peer abuse can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, including those that are AI-generated, misinformation, disinformation (including fake news) and conspiracy theories
- Understand that some groups can be more vulnerable to risk, such as those with Special Educational Needs and Disabilities (SEND), certain health conditions, females, gender questioning LGBTQ+, care leavers, children in care and those previously in care and separated migrant children
- Recognise that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation
- Be aware of the safeguarding response for children who are absent from education, especially for repeated or prolonged periods, as this is a key indicator of potential abuse and exploitation. This includes, but is not limited to, neglect, child sexual exploitation (CSE), and child criminal exploitation (CCE), particularly county lines. Prompt referral to children's services is required where such absence raises a safeguarding concern
- Understand their responsibilities relating to safeguarding themselves and others, demonstrating appropriate behaviour in line with the staff code of conduct. Raising any safeguarding low-level concern or allegation about a colleague or staff member immediately to the DLS and the Group Director for HR
- Raise any concerns about poor, unsafe or safeguarding practices to the DSL. If, for any reason, they are unable to do so, raise them to the Group Principal, Chief Executive Officer (CEO) or Vice Principal, through the Whistleblowing Policy or via the NSPCC whistleblowing helpline



## **Related Documentation**

- Appendix 1 – Safeguarding Contacts
- Appendix 2 – Safeguarding Procedures
- Appendix 3 – Supporting Vulnerable Students
- Appendix 4 – Safeguarding Concerns
- UCP Policies
- STU004 - Student Positive Behaviour Policy
- STU003 - Fitness to Study Policy
- HR policies including HR015 - Safer Recruitment and Selection,, HR002 - Code of Conduct and Ethical Standards, HR021 - Disclosure and Barring Service Policy, HR013 Harassment and Bullying (staff), HR008 - Grievance and Disciplinary
- STU005 - Bullying and Harassment Policy
- SAF002- Online Safety and Social Media Policy
- STU009 - Dealing with Disclosures of Unspent Criminal Convictions
- STU003 - Fitness to Study Policy
- Visitors, Contractors and Lone Workers Policy
- HR001 - Whistleblowing Policy
- EDI002 - SEND Policy
- CQ013 - External Speakers Policy
- CQ016 - Commercial Hire, External Events and Lettings Policy
- EMP001 - Employer Placement Policy

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## Safeguarding for All Policy – Contacts

| KEY CONTACT WITHIN INSPIRE EDUCATION GROUP                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Sarah Young - Vice Principal – Student &amp; Staff Experience</p> <p><b>Advisory Safeguarding Lead (DSL)</b></p> <p>Tel: 01780 484300 ext. 657, email: <a href="mailto:sarah.young@ieg.ac.uk">sarah.young@ieg.ac.uk</a></p>                                |
| <p><b>Designated Safeguarding Lead (DSL) - Peterborough Campus</b></p> <p>Laila Bentley – Assistant Principal Student Experience &amp; Support</p> <p>Tel: 01733 762278, email: <a href="mailto:laila.bentley@ieg.ac.uk">laila.bentley@ieg.ac.uk</a></p>      |
| <p><b>Designated Safeguarding Lead (DSL) - Stamford Campus</b></p> <p>Julie Addison – Assistant Principal Student Experience &amp; Support</p> <p>Tel: 01780 484300 ext. 501, email: <a href="mailto:Julie.addison@ieg.ac.uk">Julie.addison@ieg.ac.uk</a></p> |
| <p><b>Inspire Education Group - Safeguarding Governor</b></p> <p>Angie Morris</p>                                                                                                                                                                             |

## SAFEGUARDING TEAM - STAMFORD CAMPUS

| Role                                                                                                     | Name             | Contact number<br>Email                                                                                                  |
|----------------------------------------------------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------|
| <p><b>Deputy Designated Safeguarding Lead (DDSL)</b></p> <p>Head of Student Wellbeing and Engagement</p> | Carol Barker     | <p>01780 484657</p> <p>Mobile: 07709721460</p> <p><a href="mailto:carol.barker@ieg.ac.uk">carol.barker@ieg.ac.uk</a></p> |
| <p><b>Deputy Designated Safeguarding Lead (DDSL)</b></p> <p>Safeguarding Lead</p>                        | Clair Munton     | <p>01780 484380</p> <p>Mobile 07516792234</p> <p><a href="mailto:Clair.munton@ieg.ac.uk">Clair.munton@ieg.ac.uk</a></p>  |
| Student Wellbeing, Safeguarding and Engagement Advisor                                                   | Danielle Burford | <p>Ext 427</p> <p><a href="mailto:Danielle.burford@ieg.ac.uk">Danielle.burford@ieg.ac.uk</a></p>                         |
| Student Wellbeing, Safeguarding and Engagement Advisor (Designated Teacher)                              | Jacqui Freeman   | <p>Ext 369</p> <p><a href="mailto:jacqueline.freeman@ieg.ac.uk">jacqueline.freeman@ieg.ac.uk</a></p>                     |
| Student Wellbeing, Safeguarding and Engagement Advisor                                                   | Iveta Bulla      | <p>Ext 428</p> <p><a href="mailto:iveta.bulla@ieg.ac.uk">iveta.bulla@ieg.ac.uk</a></p>                                   |
| Student Wellbeing, Safeguarding and Engagement Advisor                                                   | Vacant           | Ext 380                                                                                                                  |
| Student Wellbeing, Safeguarding and Engagement Advisor                                                   | Jazmin Chick     | <p>Ext 369</p> <p><a href="mailto:Jazmin.chick@ieg.ac.uk">Jazmin.chick@ieg.ac.uk</a></p>                                 |

**Policy Name:** SAF001 - Safeguarding for All Policy - Appendix 1 - Safeguarding Contacts

**Policy Author:** Assistant Principal Student Experience and Support

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|                                                       |                   |                                                                                                                                                                  |
|-------------------------------------------------------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SKWL Operational Lead-Safeguarding Officer            | Beverley Peasgood | <a href="mailto:beverley.peasgood@stamford.ac.uk">beverley.peasgood@stamford.ac.uk</a>                                                                           |
| Student Engagement Lead and <b>Day Duty Principal</b> | Rick Mosely       | 01780 484327<br><a href="mailto:rick.mosley@ieg.ac.uk">rick.mosley@ieg.ac.uk</a><br><a href="mailto:duty.principalsmd@ieg.ac.uk">duty.principalsmd@ieg.ac.uk</a> |

### **SAFEGUARDING TEAM - PETERBOROUGH CAMPUS**

| <b>Role</b>                                                                                          | <b>Name</b>                  | <b>Contact number</b><br><b>Email</b>                                                                                                                               |
|------------------------------------------------------------------------------------------------------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Deputy Designated Safeguarding Lead (DDSL)</b><br>Head of Student Wellbeing and Engagement        | Vacant                       |                                                                                                                                                                     |
| <b>Deputy Designated Safeguarding Lead (DDSL)</b><br>Senior Safeguarding Lead<br>Domestic Abuse Lead | Emma Foley                   | 07701262476<br><a href="mailto:Emma.foley@ieg.ac.uk">Emma.foley@ieg.ac.uk</a>                                                                                       |
| Safeguarding Team member (Job Smart)                                                                 | Tracey Unwin<br>Marc Stewart | 01733 863 068 <a href="mailto:Tracey.unwin@ieg.ac.uk">Tracey.unwin@ieg.ac.uk</a><br>01733 863068 <a href="mailto:Marc.stewart@ieg.ac.uk">Marc.stewart@ieg.ac.uk</a> |
| Safeguarding Team member (14-16 Youth Mentor- Learner Engagement)                                    | Sarah Laing                  | 01733 427295<br><a href="mailto:sarah.laing@ieg.ac.uk">sarah.laing@ieg.ac.uk</a>                                                                                    |
| Safeguarding Team Member (Mental Health and Wellbeing Lead)                                          | Charlotte Judge              | 07515 188343<br><a href="mailto:Charlotte.judge@ieg.ac.uk">Charlotte.judge@ieg.ac.uk</a>                                                                            |
| Student Wellbeing, Safeguarding and Engagement Advisor                                               | Cat Tonge                    | 01733 762307<br><a href="mailto:Cat.tonge@ieg.ac.uk">Cat.tonge@ieg.ac.uk</a>                                                                                        |
| Safeguarding Team member (Inclusive Learning)                                                        | Emily Quinn                  | 07935 013508<br><a href="mailto:Emily.quinn@ieg.ac.uk">Emily.quinn@ieg.ac.uk</a>                                                                                    |
| <b>Designated Safeguarding Lead</b> Nursery Manager                                                  | Brogan Rainey                | 07837 588261<br><a href="mailto:brogan.rainey@ieg.ac.uk">brogan.rainey@ieg.ac.uk</a>                                                                                |
| Vulnerable Learner Lead<br><b>Designated Teacher</b>                                                 | Kelly Briggs                 | 07925 035884<br><a href="mailto:Kelly.briggs@ieg.ac.uk">Kelly.briggs@ieg.ac.uk</a>                                                                                  |

**Policy Name:** SAF001 - Safeguarding for All Policy - Appendix 1 - Safeguarding Contacts

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|                                                                                     |                           |                                                                                                      |
|-------------------------------------------------------------------------------------|---------------------------|------------------------------------------------------------------------------------------------------|
| Student Wellbeing,<br>Safeguarding and<br>Engagement Advisor                        | Emma<br>James-German      | 01733 762158<br><a href="mailto:emma.james-german@ieg.ac.uk">emma.james-german@ieg.ac.uk</a>         |
| Student Wellbeing,<br>Safeguarding and<br>Engagement Advisor<br>Domestic Abuse Lead | Izzy Stewart              | 01733 762158<br><a href="mailto:izzy.stewart@ieg.ac.uk">izzy.stewart@ieg.ac.uk</a>                   |
| Student Wellbeing,<br>Safeguarding and<br>Engagement Advisor                        | Angela Fairbrace          | 01733 762304<br><a href="mailto:Angela.fairbrace@ieg.ac.uk">Angela.fairbrace@ieg.ac.uk</a>           |
| Student Wellbeing,<br>Safeguarding and<br>Engagement Advisor                        | Millie Lynch              | 01733 762270<br><a href="mailto:Millie.lynch@ieg.ac.uk">Millie.lynch@ieg.ac.uk</a>                   |
| Student Engagement Lead<br>and <b>Day Duty Principal</b>                            | Lisa-Nightingale-<br>Gepp | 07935 013526<br><a href="mailto:Lisa.nightingale-gepp@ieg.ac.uk">Lisa.nightingale-gepp@ieg.ac.uk</a> |
| Deputy Day Duty Principal                                                           | Sandra Starkey            | 07935 013526<br><a href="mailto:sandra.starkey@ieg.ac.uk">sandra.starkey@ieg.ac.uk</a>               |

### Local Safeguarding Boards

#### **Lincolnshire Safeguarding Children Partnership**

[Report a concern about a child](#)

[Report a concern about an adult](#) – referral form

[Report a concern about a staff member or volunteer](#)

Children's safeguarding - 01522 782111 (Monday to Friday, 8 am to 6 pm)

Adults' safeguarding - 01522 782155 (Monday to Friday, 8 am to 6 pm)

or 01522 782333 (outside office hours)

For domestic abuse, call EDAN Lincs on 01522 510041

#### **Cambridgeshire and Peterborough Safeguarding Partnership**

(8 am to 6 pm Monday to Friday, 9 am to 1 pm on Saturday)

##### **Cambridgeshire**

[referral.centre-adults@cambridgeshire.gov.uk](mailto:referral.centre-adults@cambridgeshire.gov.uk)

[Safeguarding Adults referral form - Cambridgeshire County Council](#)

[Make a professional referral to Cambridgeshire County Council Children's Services - Cambridgeshire County Council](#)

Children's Services: 0345 045 5203

Adult Services: 0345 045 5202



Emergency Duty Team (Out of Hours) 01733 234724

Adult Social Care MASH – 01733 864038 Option 1

**Peterborough**

Children's Social Care referral & Assessment team: 01733 864180

Referral for professionals

<https://www.peterborough.gov.uk/children-and-families/childrens-social-care/safeguarding-children>

[Safeguarding Adults Referral Form](#)

[adultsocialcare@peterborough.gov.uk](mailto:adultsocialcare@peterborough.gov.uk)

[Make a professional referral to Peterborough City Council Children's Services](#)

PCC Education Safeguarding Lead [educationsafeguarding@peterborough.gov.uk](mailto:educationsafeguarding@peterborough.gov.uk)

Education Navigator – MASH [educationnavigator@peterborough.gov.uk](mailto:educationnavigator@peterborough.gov.uk)

Mash – General Enquiries: 01733 864170

Mash- Professional Consultation Line: 01733 864180

Mash referral portal [Professional \(peterborough.gov.uk\)](#)

Children's Services: 0345 045 5203

Adult Services: 01733 747474

Emergency Duty Team (Out of Hours) 01733 234724

Early Help: 01733 863649, [targetedsupport@peterborough.gov.uk](mailto:targetedsupport@peterborough.gov.uk)

Police Child Abuse Investigation Unit Tel: 101

**Local Authority Designated Officer (LADO)**

**Email:**

[LADO@cambridgeshire.gov.uk](mailto:LADO@cambridgeshire.gov.uk)

[LADO@peterborough.gov.uk](mailto:LADO@peterborough.gov.uk)

[LSCP\\_LADO@lincolnshire.gov.uk](mailto:LSCP_LADO@lincolnshire.gov.uk)

**Telephone Contacts:**

01223 727967 – Cambridgeshire

01733 864038 – Peterborough

01572 554674 - Lincolnshire

Out of Hours Emergency Duty Team: 0345 0455203 Cambridge, 01733 864180 Peterborough

**Prevent Contact Details**

Lincolnshire

[prevent@lincs.pnn.police.uk](mailto:prevent@lincs.pnn.police.uk)

Cambridgeshire Prevent

Officers [prevent@cambs.pnn.police.uk](mailto:prevent@cambs.pnn.police.uk) 01480  
422596

## **Safeguarding for All Policy - Procedures**

The Inspire Education Group (IEG) has developed procedures in line with and taking account of guidance issued by the Department for Education (DfE), the Association of Colleges (AoC) and other relevant bodies. These procedures are consistent with the requirements of the Local Safeguarding Children and Adults Boards.

Compliance with statutory recommendations is reflected in the following commitments:

- Providing a training programme of mandatory key areas, including Safeguarding, Prevent, Female Genital Mutilation (FGM), Keeping Children Safe in Education (KCSiE) via annual, refresher and inductions, alongside additional staff development opportunities to update on legal and national themes
- Ensuring that all governors receive appropriate safeguarding training that is regularly updated and are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty, Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance, July 2025 and the local multi-agency safeguarding arrangements
- Appointing a nominated Governor whose role is to ensure that the Group has an effective policy, locally agreed procedures are in place and that the policy and structures supporting safeguarding are reviewed annually
- Reporting annually to the Corporation board for strategic challenge and assurance of a robust whole group approach to safeguarding
- Implementing a robust Prevent risk assessment and safeguarding action plan, which are reviewed annually and monitored through the IEG Safeguarding and Prevent committee
- Ensuring a senior member of staff from the leadership team has the role of the Designated Safeguarding Lead (DSL), taking the lead responsibility for safeguarding. The responsibility is explicit in the DSL and any deputy job description, with time, training, funding, resources and support to undertake their duties
- Ensuring that the DSL and all deputies (DDSLs) undertake the two-day training provided by the Education Safeguarding Team, and that this is updated every two years. In addition, knowledge and skills are refreshed at regular intervals throughout the year
- Providing a rota during term time and college hours, where a deputy or Safeguarding Team member will always be available
- Operating safe recruitment practices for its employees and visitors, including ensuring appropriate Disclosure and Barring Service (DBS), self-declaration, identity, right to work, health, reference and online/social media checks are undertaken according to Part 3 of KCSiE
- Ensuring any recruits who do not have a valid DBS are not unsupervised until this has been received. Undertaking a risk assessment, approved by the Group Principal CEO, before the member of staff can commence employment
- Ensuring the upkeep of a Single Central Record (SCR) of all staff, agency, volunteers, Governors and frequent visitors (visiting associates) following government guidance and the DBS



- Ensuring existing staff complete and sign an annual self-declaration, detailing if they have had any criminal convictions, reprimands or final warnings since their last DBS disclosure
- Keeping the Group Principal informed of any issues, ongoing investigations and staff allegations. In the cases of staff allegations that meet the threshold, liaising with the local
- Authority-designated officer (LADO) and or adult services if required. Where the Group Principal is the subject of the allegation, the report will be made to the Chair of Governors
- Ensuring investigation and disciplinary proceedings against staff, supply staff, volunteers, Governors and frequent visitors relating to safeguarding allegations are managed fairly, quickly and consistently, keeping the individual informed of the progress and concluded in full, even when no longer employed. Notification of any concerns and outcomes is made to the relevant authorities, DBS and professional bodies and included in references where applicable
- Informing the Education and Skills Funding Agency (ESFA) directly if the Group itself, or one of its subcontractors, is the subject of an investigation by the Local Authority or the police in connection with a Prevent issue or safeguarding-related concern
- Including opportunities in study and personal development programmes for students, which encourage confidence, self-esteem, motivation and understanding of stereotyping, prejudice and equality, healthy and unhealthy sexual relationships, including consent, to develop the skills they need to recognise abuse, including from their peers and online, to stay safe
- Promoting educational outcomes by sharing information about the welfare and safeguarding issues that students (including students with a social worker) are experiencing/have experienced with appropriate college staff
- Liaising with the three safeguarding partners (Local Authority, Clinical Commissioning Group and Police) as appropriate and working with other agencies in line with Working Together to Safeguard Children, 2023
- Ensuring training and processes are in place for case referral to the Channel programme where there is a radicalisation concern. Where appropriate, having representation at the Channel panel to help with this assessment
- Deciding upon the appropriate level of response to specific concerns, e.g. discuss with parents, offer an Early Help Assessment or referral to social care or support agencies
- Providing alternative support and education arrangements for vulnerable and at-risk students to maintain access to the learning experience
- Ensuring that external events and visiting speakers' risk assessments are completed for all events in a timely fashion, so that they can be approved before the event takes place
- Implementing, coordinating and maintaining the vetting of all employer premises for all apprentices, industry and work placements in line with policy and procedures to ensure that a safe and secure environment is established in all aspects of the work placement
- Maintaining appropriate filters and effective monitoring systems to reasonably limit exposure to the risks associated with online safety and Generative AI
- During the non-term time, there is a safeguarding and Duty Manager/Principal rota in place, and those in immediate danger will be signposted to emergency services or social care. If, in exceptional circumstances, the DSL, DDSL or Safeguarding Team members are not available, a member of the Senior Leadership Team should be contacted. See Appendix 1 for key contacts and details



## **Record Keeping and Information Sharing**

Information about students and their families is defined as special category data, and all collection, storage and sharing of personal information will be carried out in line with the General Data Protection Regulations 2018 (GDPR).

All records will be kept electronically under restricted permissions using the Group management information system, separate from any academic records. Any hard copy files from previous education provisions will be stored securely. Where appropriate, information will be shared with a new provision in advance of the student leaving.

### **Records will include:**

- A clear and comprehensive summary of the concern
- The individual's wishes and feelings
- Details of how the concern was followed up on and resolved
- Details of any action taken, decisions reached and the outcome
- When decisions are made to share or withhold information, who the information has been shared with and why
- Discussions that have taken place with parents, other agencies or if a decision has been made not to discuss it with parents, the rationale must be recorded
- Details of instances where referrals were not made to another agency, such as the Local authority, children's social care or the Prevent program, etc

All actions and decisions are led by what is considered to be in the best interests of the student. Parents are made aware that such records exist, except where to do so would place the student at risk of harm.

The Safeguarding Team has a professional responsibility to share information with other agencies to safeguard children (as set out in 'Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, May 2024).

### **Information sharing:**

- Any Subject Access Request under GDPR, from a student or parent, must be referred to the DSL
- All information shared is based on a 'need to know' basis, considering what is necessary, proportionate and relevant. Sharing rarely involves the whole case file
- Consent to share information will always be gained unless doing so would place the student at risk of harm or prejudice the prevention or detection of crime. Where this is the case, when a discussion with social care will take place. Information may only be shared without consent where there is a good reason to do so, and that the sharing of information enhances the safeguarding of a student in a timely manner
- Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence

**Policy Name:** SAF001 - Safeguarding for All - Appendix 2 - Procedures

**Policy Author:** Assistant Principal Student Experience

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- Staff should never view or forward any suspected consensual or non-consensual nude or semi-nude images/videos. It may be appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
- Where appropriate, consent has been obtained, access and notifications shared by the Peterborough Education Safeguarding team via the Peterborough City Council Education Navigator
- Adhere to the Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Colleges and Early Years settings 2021 for all information sharing and resulting actions in relation to Operation Encompass

## Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation, and sexual predation: technology often provides the platform that facilitates harm. Generated AI adds further potential risks, including those associated with AI Chatbots, fake intimacy and harmful advice.

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

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact:** being subjected to harmful online interaction with other users; for example, peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying)
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and financial scams. For those at risk, reports can be made to The Anti-Phishing Working Group at <https://apwg.org/>

Guidance is available to staff around safe teaching and learning when working remotely. The Group has online safety, social media and acceptable use policies for staff and students, which should be considered in line with this policy. Filters and monitoring are in place to limit access to inappropriate sites.

## Child on Child Abuse, Sexual Violence and Sexual Harassment

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse), and that it can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know

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how to identify it and respond to reports. See Appendix 4, p.11 of Safeguarding Concerns for definitions of child-on-child/peer-on-peer abuse.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can occur through a group of children sexually assaulting or sexually harassing a single child or a group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally). See Appendix 4, p12 and 13, Safeguarding Concerns for the definitions of sexual violence and sexual harassment. Staff should be aware that it is more likely that females will be the victims of sexual violence and sexual harassment, and more likely it will be perpetrated by males. Safeguarding incidents and/or behaviours can be associated with factors outside the college, including intimate personal relationships. It must be clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.

All victims must be reassured that they will be taken seriously regardless of how long it has taken for them to come forward and that they will be supported and kept safe. Such behaviour should never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Abuse that has occurred online or outside of the college must be treated equally seriously. All concerns, whether reported by a student's friend or a third party, must be reported immediately to the Safeguarding Team. The process outlined in Diagram 2, Dealing with reports of sexual violence/harassment/Harmful Sexual Behaviours, will then be followed.

Supporting and protecting both the victim and the alleged perpetrator is paramount. Risk assessment and consideration of existing provision and college environment must be established to maintain, where appropriate, arrangements to provide a suitable and safe education for all parties.

Proportionality of the response will be considered on a case-by-case basis, considering the needs of those involved. Multi-agency working with relevant services will be invoked where required, alongside liaison and signposting with appropriate specialist support agencies.

## **Sharing of nudes and semi-nudes**

In the latest advice for schools and colleges on sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, Mar 24). This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. It is a criminal offence to do so. This includes those related to AI images and is recognised as the same under the law. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop, which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.



This advice does not apply to adults sharing nudes or semi-nudes of under-18-year-olds. This is a form of child sexual abuse and must be reported to the Safeguarding Team, who will refer to the police as a matter of urgency.

### **Responding to an incident:**

- Report immediately to the Safeguarding Team. The process outlined in Diagram 3 will then be followed
- Staff must never view, copy, print, share, store or save the imagery, or ask a child to share or download – this is a criminal offence
- If the staff member has already viewed the imagery by accident (e.g. if a young person has shown it before asking them not to), report this to the Safeguarding Team
- Do not delete the imagery or ask the young person to delete it
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the Safeguarding Team
- Do not share information about the incident with other members of staff, the young person(s) involved, or their parents and/or carers
- Do not say or do anything to blame or shame any young people involved
- Do explain to them that it must be reported, and reassure them that they will receive support

## Diagram 1. Dealing with Safeguarding Concerns

A member of staff identifies a concern, receives disclosure or suspects a safeguarding issue

**RECEIVE** – actively listen to the student or adult at risk, do not ask leading questions

**RESPOND** – reassure the student or adult at risk that they will be helped and supported. Do not promise confidentiality

**REACT** – inform a designated person immediately of your concerns.

Use the **Safeguarding and Mental Health Reporting form** on the staff intranet.

Alternatively, contact a member of the College Safeguarding Team, email:

[safeguarding.smd@ieg.ac.uk](mailto:safeguarding.smd@ieg.ac.uk) or [safeguarding.pbo@ieg.ac.uk](mailto:safeguarding.pbo@ieg.ac.uk)

Urgent or immediate action, call the designated safeguarding mobile:

Stamford **07810-161010** or Peterborough **07740-456720**

A member of the Safeguarding Team will discuss the concern and provide advice and support to staff, and ensure the student is supported

A member of the **Safeguarding Team** will act accordingly, investigate and make appropriate interventions. Any external referral, e.g. Early Help, Social Services, Police, or Channel, will be via the **Safeguarding Team**. Further external advice may be sought by the **Safeguarding Team** from the Local Children's Safeguarding Board. During non-term time/evenings, the Safeguarding Team/Duty Principal/Manager Rotas are in place. Those in immediate danger are signposted to emergency services

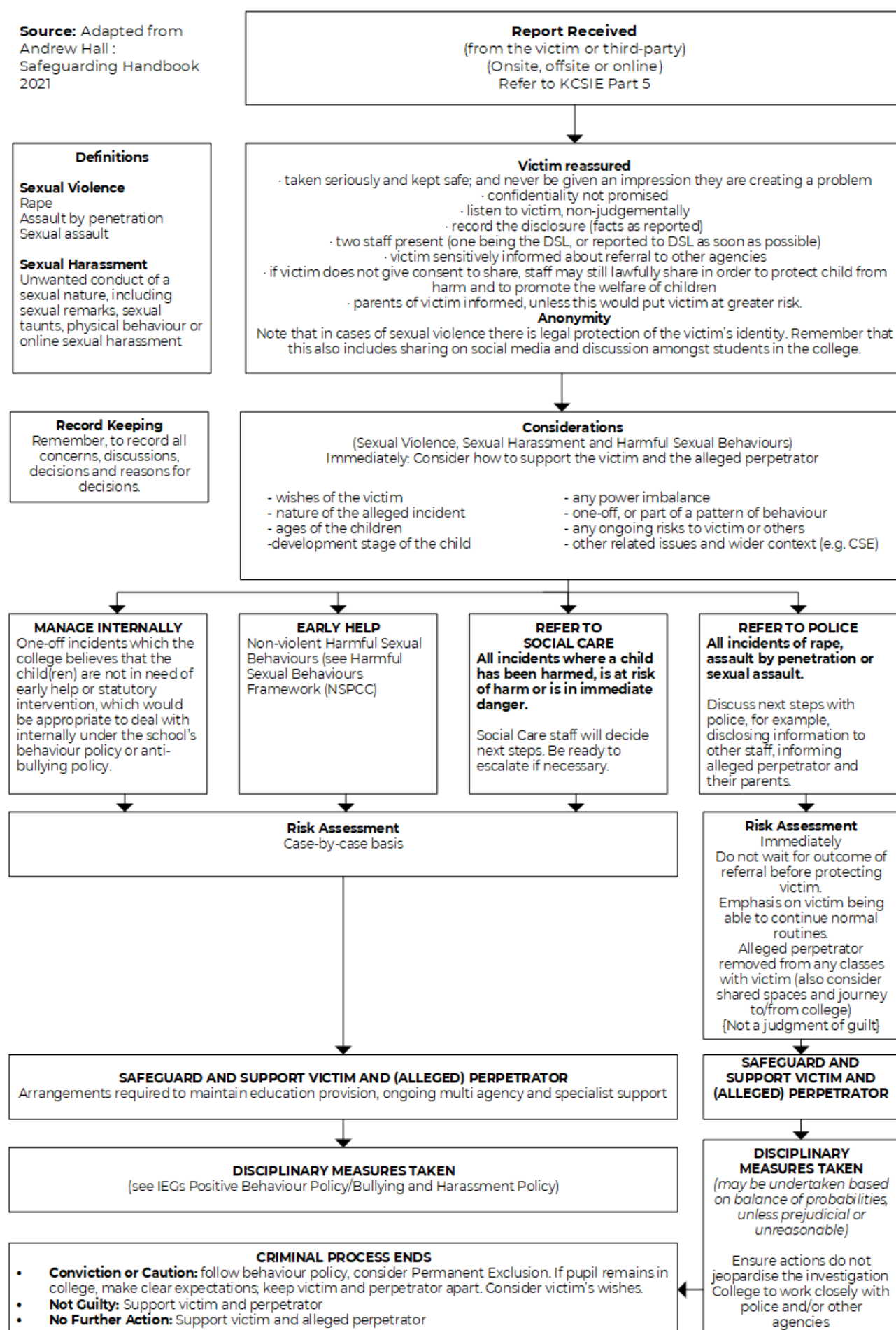
The **Safeguarding Team** will record events, actions and details of reports made and ensure safe and confidential storage of information

The **Safeguarding Team** will liaise with Social Care/Police, and other agencies. Relevant staff will be informed of any developments on a 'need to know' basis

The **Designated Safeguarding Lead** will inform the Governor of safeguarding responsibilities of referrals, issues and outcomes via Corporation reports. The Principal will be kept up to date with issues and investigations

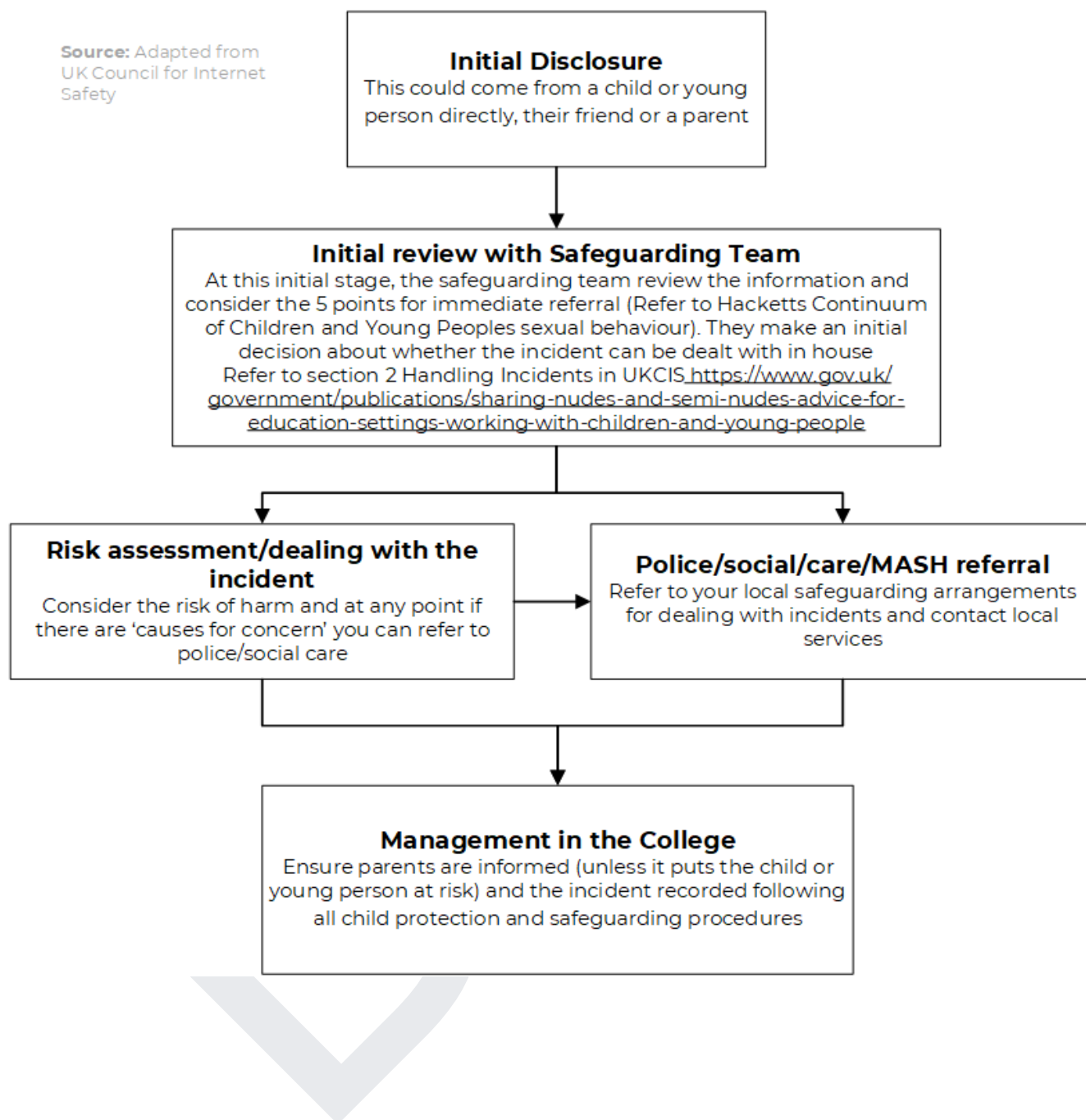
## Diagram 2. Dealing with Reports of Sexual Violence/Harassment/Harmful Sexual Behaviours

**Source:** Adapted from  
Andrew Hall :  
Safeguarding Handbook  
2021



### **Diagram 3. Dealing with Incidents Relating to the Sharing of Nudes and Semi-Nudes**

**Source:** Adapted from  
UK Council for Internet  
Safety





### Diagram 4. Dealing with Allegations or Concerns about a Member of Staff

Allegation or concern raised about a member of staff – **passed immediately to DSL and Group Director of HR**

Does it meet the harm threshold? The harm threshold is met where it is alleged that a member of staff working (or volunteering) in the Group has:

*behaved in a way that has harmed a child, or may have harmed a child and/or possibly committed a criminal offence against or related to a child and/or behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children (see KCSIE Part 4)*

**Immediate investigation and case review meeting to determine next steps. In all cases ensure support/safeguarding measures for staff member subject to allegation and address welfare/risk of harm of alleged victim/s**

#### Contact LADO

The LADO will ask for specific information about the issue and confirm whether or not it meets the harm threshold. If it does, they will begin a formal process to manage the allegation. If it doesn't meet the threshold then they will record the information and advise to treat the issue as a Low-Level Concern. The staff must be informed that LADO holds information on them.

#### Low Level Concern

Appropriate action will be agreed based on relevant HR policy.

The incident will be recorded as a low-level concern on a secure central file.

#### Key Considerations:

Length of employment

Any previous concerns raised, a one-off or part of a pattern of behaviour? Would an associated pattern of behaviour (if it exists) be seen by others? a planned action or event?

Whether the member of staff previously been given advice in this area?

Could this behaviour be inadvertent? What is the likelihood of this?

Could this be the precursor to more concerning behaviour?

Did it occur in a 'public' or 'private' place? Was this in or out of the workplace?

If electronic devices are involved, have any relevant files been deleted and any evidence of this?

If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?

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## **Supporting Vulnerable Students**

Inspire Education Group (IEG) is committed to meeting the needs of all its students and recognises that those who are vulnerable may require additional support and arrangements.

### **Vulnerable Children and Adults Definitions**

Within the context of this policy, a child is defined as anyone under the age of 18. Vulnerable children include those:

- With a social worker, including children who have a Child Protection Plan and those who are looked after by the Local Authority
- Assessed as being in need, or otherwise meet the definition in section 17 of the Children's Act 1989
- With additional needs, special educational needs and or disabilities (SEND), emotional and behavioural difficulties, mental health difficulties and may have an Education Health and Care Plan (EHCP)
- Assessed as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued attendance and Early Help. This might include those who are:
  - On the edge of receiving support from children's social care services
  - In the care of the Local Authority and those with kinship care arrangements
  - Privately fostered (under the age of 16, under 18 if they have a disability), and adopted children
  - At risk of becoming 'not in employment, education or training' NEET, including experiencing multiple suspensions and risk of exclusion
  - Living in temporary accommodation
  - Young Carers
  - Young Parents
  - Experiencing bereavement
  - Have family members who are in prison or are affected by parental offending
  - Showing signs of abuse and neglect
  - Living with: domestic abuse, substance misuse, poverty, homelessness, adult mental health
  - Showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups
  - Misusing drugs or alcohol
  - At risk of modern slavery, trafficking, sexual and or criminal exploitation
  - Susceptible to extremist ideology and radicalisation
  - Frequently going missing from care or from home
  - Unexplained and or persistent absences from education, including repeat occasions and/or prolonged periods

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- o Unaccompanied Asylum-Seeking Children (UASC)/separated migrant children and refugees
- o At risk of so-called 'honour' based abuse, such as Female Genital Mutilation or Forced Marriage
- o Siblings in recognition of those at risk of intra-familial harm
- o viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

Vulnerable adults (defined by Section 59, Safeguarding Vulnerable Groups Act 2006) are at the age of 18 or over, to whom one of the following applies:

- Has a reduced capacity to give consent to a disclosure of abuse allegations or suspicion
- Has additional needs, SEND, emotional and behavioural difficulties and mental health difficulties and may have an EHCP up to the age of 25
- Detained in custody or under the supervision of the probation services
- Leaving care services, seeking asylum or refuge
- In need of community care services because of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation. This may include:
  - o Receiving personal care, nursing, or support to live independently in their own home or a care home
  - o Receiving any health or social services support

### **Children and adults who are lesbian, gay, bisexual, queer or gender questioning**

The fact that a student may be LGBTQ+ is not in itself an inherent risk factor for harm. However, students who are LGBTQ+ can be targeted by other students. They are at greater risk of some types of abuse. For example, they might experience homophobic, biphobic or transphobic bullying or hate crime. They might also be more vulnerable to or at greater risk of sexual abuse, online abuse or sexual exploitation.

In some cases, a student who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as those who identify as LGBTQ+.

Risks can be compounded where students who are LGBTQ+ lack a trusted adult with whom they can be open with.

For students who are gender questioning, it is essential to consider the broad range of their individual needs, recognising where support and clinical signposting are needed and any vulnerabilities they may be exposed to, such as risks of bullying. It is important to be mindful of the impact of language and activities that repeat or enforce gender stereotypes and the law about biological sex and gender reassignment, recognising that legal rights based on biological sex differ from those with the protected characteristic of gender reassignment.

**Children and adults with SEND and certain health conditions can face specific challenges both online and offline, including:**

- Being more prone to peer group isolation or bullying (including prejudice-based bullying)
- Difficulties with communication, making disclosures and investigations difficult
- Assumptions that behaviour, mood or injury are interpreted as relating to their SEND rather than any abuse
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content, and then repeating the content/behaviours in colleges or the consequences of doing so

**Identifying Vulnerable Children and Adults**

Across the Group, students at risk are identified through a variety of ways:

- Application and enrolment screening
- School liaison and references
- Sharing of safeguarding files
- Multi-Agency referrals, including Youth and Probation services
- EHCP consultations and review process
- Induction process
- Student finance application screening
- Additional Learning Support screening
- Disciplinary referrals
- Academic and support staff reporting and monitoring
- Welfare and mentoring staff reporting and monitoring
- Attendance/absence monitoring
- Regular 'At Risk meetings'
- Self-referral

**Supporting Vulnerable Children and Adults**

Support arrangements for vulnerable students are underpinned by:

- Priority status in person-centred decision making, including housing allocation, benefit application, accessing support, additional career guidance, financial help, welfare provision, etc, to minimise barriers to opportunities
- Strong links with external partners and local authorities, as well as local and national agencies, to ensure a multi-disciplinary approach to support students with wrap-around services
- Provision of bursary support to remove financial barriers, and where eligible, free college meals for 16-18-year-olds
- Consistent implementation of student codes of conduct and behavioural policies ensures that students know what behaviour is unacceptable

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- Continuing support and activities of additional learning, student engagement, welfare, mental health and wellbeing and external signposting, whether onsite or remote in the case of alternative arrangements
- Development of a responsive and knowledgeable staff team trained to respond appropriately in safeguarding situations
- Effective absence reporting and attendance monitoring, particularly for those absent from education on repeat occasions and or/prolonged periods
- Creating a culture, including safe spaces for students, including those with SEND, LGBTQ+, and gender questioning, to share concerns and access to extra pastoral support
- Working collaboratively with the students' parents/carers or nominated person in supporting gender questioning (except in circumstances where parental involvement would pose a significant risk of harm) and encouraging seeking clinical advice where appropriate
- Embedding throughout the student journey, opportunities to raise awareness and educate about safe and responsible practices, including information and materials that support students in keeping themselves safe from abuse, including abuse from their peers and online
- Regular 'At Risk meetings' are held where key members of the Student Wellbeing Services team collaboratively coordinate action and support for priority cases
- Collecting two emergency contact details at the point of enrolment
- A comprehensive Fitness to Study Policy, which gives a framework to support students, and a Bullying and Harassment Policy to respond to allegations
- Commitment to provide alternative working and support arrangements in response to long-term absence arrangements, including telephone welfare checks, virtual hosted Electronic Personal Education Plan (EPEP) and EHCP reviews, remote support for e-learning/Google classrooms, risk assessments and care plans

## **Working in Partnership**

The Groups Safeguarding Team will assist the Local Authority, Police and Clinical Commissioning Groups to exercise their statutory functions, contributing to Multi-agency working, including:

- Attending case conferences, Core Group meetings/Children in Need meetings in liaison with key agencies
- Gathering information from all relevant sources to contribute to an assessment and coordinating the implementation of any aspects of the Child Protection Plan/Child in Need Plan
- Notifying Children's Services when there is an unexplained absence or exclusion for a child who is the subject of a Child Protection Plan, a child/student/vulnerable adult is missing/absent from education
- Following the mandatory duty to inform the local authority of any 'Private Fostering' arrangements

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- Vigilantly monitoring the welfare of children living in domestic abuse households, offering support and contributing to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required
- Working in partnership with Cambridgeshire Police and Cambridgeshire County Council/Peterborough City Council/Peterborough Education Safeguarding Team to identify and provide appropriate support to students who have gone missing, experienced domestic abuse or where the police have been called to a domestic incident through the Operation Encompass Scheme
- Work collaboratively with a range of specified authorities, including the police, local government, youth offending teams, health and probation services, to support plans to reduce serious violence in local communities
- Working with the Local Authority Virtual College Head (VSH) to promote the educational achievement of children with a social worker and children in kinship care, in addition to looked-after and previously looked-after children
- Completing the Safeguarding Children Partnership Board's [Child Sexual Abuse Assessment Tool](#), and referring to Social Care if there is a concern that a student may be at risk of Child Sexual Exploitation (CSE) or Criminal Exploitation (CCE)
- Referring to the Safeguarding Children Partnership Board's [Child Sexual Abuse Assessment Tool](#), if there is a concern that a student may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse. Additionally, drawing upon resources from the Centre of Expertise on Child Sexual Abuse and Lucy Faithfull Foundation's 'Shore Space' for supporting young people worried about sexual behaviour
- Proactive engagement and representation with safeguarding boards, committees for groups such as Hate Crime, Missing and Criminal and Sexual Exploitation and those related to mental health
- Working with Channel, a voluntary, confidential support programme that focuses on providing support at an early stage to those who are vulnerable to being drawn into terrorism

## Early Help

Early Help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Early help can be particularly useful to address non-violent HSB and may prevent the escalation of sexual violence.

The Early Help Assessment (EHA) is a single assessment that is created with the family. It should reflect their views, wishes and feelings and what they want to change. It is shared when appropriate (and where there is consent) with other professionals who are working in a coordinated way to support the family. EHA's are completed by any professional or partner agency that comes into direct contact with families, and who has identified more than one unmet need that would benefit from a multi-agency support approach. In the first instance, staff should discuss early help requirements with a member of the Safeguarding Team. Staff may be required to share information to support other agencies and professionals in an Early Help Assessment.

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## **Safeguarding for All Policy – Safeguarding Concerns**

### **Children in Need**

Children and young people who are defined as being “in need” under Section 17 of the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a Child in Need.

### **Children suffering or likely to suffer significant harm**

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare, and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, female genital mutilation, or other so-called ‘honour’-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

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

Child Criminal Exploitation encompasses both Child Sexual Exploitation (CSE) and Criminal Exploitation is most associated with County Lines. Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation. Both involve targeting and grooming young People.

**Targeting** is the process offenders use to identify a victim. Children most likely to be targeted are those in groups identified as “vulnerable”. They may fall into one of some of the categories:

- Children with troubled or unsettled lives
- Children with identified behavioural or emotional problems at school
- Children who are separated from their parents
- Children who are known to have been previously abused
- Insecure children with low self-esteem
- Isolated children, socially or geographically
- Children with disabilities or SEN

**Grooming** is the process by which an offender manipulates the environment in order to increase the likelihood of offending without being caught. Some areas to consider in relation to grooming are listed below:

- It involves adults and children
- The more protective adults a child has in their network, the less likely they are to be successfully targeted
- It is subtle, and it may be carried out in such a way as to have an “innocent” explanation
- It is manipulative and deliberate



- It may be seen as warmth and helpfulness, making the person extremely plausible;
- It can be a slow process
- Children become entrapped and feel responsible and guilty
- Children are coerced into keeping secrets

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 another 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 is 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.

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

**Criminal exploitation of children includes a combination of:**

- Pull factors: children performing tasks for others, resulting in them gaining accommodation
- Food, gifts, status or a sense of safety, money or drugs; often the hook is through the
- Perpetrator supplying Class B drugs such as cannabis to the child or young person
- Push factors: children escaping from situations where their needs are neglected and there is exposure to unsafe individuals, where there is high family conflict or the absence of a primary attachment figure
- Control: Brainwashing, violence and threats of violence by those exploiting the child
- Particularly when the child or young person is identified by the police, they are expected to take full responsibility for the offences for which they are charged – i.e. possession and supply of illegal substances

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

- Appear with unexplained gifts or new possessions
- Associate with other young people involved in exploitation
- Suffer from changes in emotional well-being

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- Misuse of drugs and alcohol
- Go missing for periods or regularly come home late
- Regularly miss school or education, or do not take part in education

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

- Have older boyfriends or girlfriends
- Suffer from sexually transmitted infections
- Display sexual behaviours beyond expected sexual development or become pregnant

### 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 forms 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 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, perpetrator or alleged 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
- They are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- They are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or a hotel room where there is drug activity
- Owe a ‘debt bond’ to their exploiters
- Have their bank accounts used to facilitate drug dealing

### Extremism

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.

A new definition of extremism was published on 14th March 2024:

Extremism is the promotion or advancement of an ideology based on violence, hatred or



intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary Democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

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

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

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 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.

#### **Possible Indicators that FGM is about to happen:**

- Talking about getting ready for a "special ceremony"
- Family arranging a long break abroad
- Family being from one of the "at-risk" communities for FGM
- Knowledge that an older sibling has undergone FGM
- Talks of going abroad to be "cut" or get ready for marriage

#### **Possible indicators that FGM has already happened:**

- Prolonged absences from education or other activities
- Behaviour change on return from a holiday abroad, such as withdrawal and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between their legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infections
- Disclosure

### **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, or 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 difficulties, for example).

In addition, some communities use religion and culture as a way to coerce a person into marriage.

Unlike an arranged marriage, where the prospective spouses may choose whether or not they wish to accept the partnership, a forced marriage is when one or both spouses do not consent to the marriage, or consent is extracted through duress.

- Concept of “honour” – maintaining the reputation of the family
- Can involve girls as young as 11
- Emphasis on getting people to places of safety
- Risk can be exceptionally high

When it comes to the marriage of a **child**, the distinction between a forced marriage and an arranged marriage does not exist. Following the legislation, which came into force on 27 February 2023. It is an offence to engage in any conduct for the purpose of causing a child to marry before their eighteenth birthday, **even if violence, threats or another form of coercion is not used**. Such a marriage is deemed a forced marriage. (The same legislation also provides that the minimum age at which one can legally marry or enter into a civil partnership in England and Wales is 18.)

### **Honour-Based Abuse**

So-called honour-based abuse (HBA) encompasses crimes that 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. All forms of HBA are abuse (regardless of motivation) and should be handled as such. If in any doubt, staff should speak to the students.

Breast ironing is a well-kept secret between the young girl and her mother. Often, the father remains completely unaware. Breast Ironing, also known as “Breast Flattening”, is the process whereby young pubescent girls’ breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely.

### **Radicalisation**

Students can be vulnerable to extremist ideology and radicalisation.

- 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 property damage, or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public, and is made to advance a political, religious or ideological cause

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## **Terrorism**

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern

### **Low risk**

Low risk means there's no evidence to suggest the learner is susceptible to radicalisation into terrorism. Low-risk behaviours, when seen alone, would not necessarily need to be explored further.

Low-risk behaviours include:

- Holding strong opinions or values (non-violent or non-extremist)
- Criticising government policies
- Adopting visible signs, for example, wearing clothing (non-violent or non-extremist), to express identity or a sense of belonging
- Being active on social media
- Taking a keen interest in national and international affairs
- Demonstrating support and supporting causes, for example, animal rights (non-violent)
- Showing new interest in a political ideology or religion
- Holding or expressing conservative values or practices, whether traditional, cultural or religious (unless they cause harm to a child or others, for example, female genital mutilation)

### **Low risk: what to do**

Where there is low risk, you should think about:

- Talking informally to the learner about the changes in their behaviour
- Providing an opportunity to debate controversial issues in a safe space
- Offering information about how to keep safe online

### **At risk: what to do**

If you think a learner is at risk, you should look at their behaviour and gather all the information you need to make a full assessment of risk and harm.

You should ask yourself:

- If you have enough information to make a comprehensive assessment
- What's happened in the past to trigger the incident
- If this is an isolated incident or a pattern of behaviour
- What else do you know, and if there are any relevant vulnerability factors
- If there are any relevant contextual factors - for example, previous safeguarding concerns, behaviour, attendance, attainment, general wellbeing
- If there are any protective factors - for example, supportive personal relationships with peers and family, environmental factors such as school, college, provider or home life

### **You should:**

- Talk to the learner in a safe space - see how to speak to a learner susceptible to radicalisation
- Talk to the parents or carers (if under 18) about your concerns - see 'informing the child, young person, parents or carers' in making a referral to Prevent
- Make a holistic assessment of vulnerability, examining risk and protective factors as set out on page 15 of Working Together to safeguard children



### **Medium risk**

Medium risk means a learner is at heightened risk of radicalisation. There may be several indicators of risk.

If the learner is at risk of harm, you should make a Prevent referral immediately.

Medium risk behaviour includes:

- Legitimising the use of violence to defend ideology or cause
- Accessing extremist or terrorist websites, forums and publications
- Expressing dehumanising views
- Expressing an interest in travelling to a conflict zone
- Being in contact with a group or individuals known to support a violent extremist ideology, either online or in real life
- Expressing persistent intolerance towards groups of people perceived as 'other' - this may be based on protected characteristics such as gender, religion or ethnicity, but not exclusively
- Demonstrating a fixation with weaponry or explosives (this may include posing in concerning photographs or videos with weaponry), without an otherwise reasonable explanation
- Being obsessed with massacre, or extreme or mass violence, without targeting a particular group (for example, high school shootings)

### **Medium risk: what to do**

If you suspect a learner is at medium risk, you should assess their vulnerability and examine the risk and protective factors as set out in the statutory guidance on working together to safeguard children.

You should ask yourself:

- If there's reasonable cause to suspect that the learner is suffering or likely to suffer significant harm
- What the risks are and what would happen if these needs are not met, - what the impact will be on the learner, - what you're worried about
- What else do you know, and if there are any relevant vulnerability factors
- If there are any relevant contextual factors - for example, previous safeguarding concerns, behaviour, attendance and attainment records and general wellbeing
- If there are any protective factors - for example, supportive personal relationships with peers and family, environmental factors such as school, college, provider or home life

If the learner is suffering from or is at risk of harm, including vulnerability to radicalisation, you should act immediately and follow the internal safeguarding policy, including the designated safeguarding lead, considering making a referral to Prevent. Your Prevent partners may give you advice or forward the referral on to Channel as appropriate.

Channel is a multi-agency partnership that supports people identified as at risk of being drawn into terrorism. Channel focuses on early intervention to provide support at an early stage. To find out more, read 'Channel support' in making a referral to Prevent.

You should also carry out an assessment to identify whether any needs should be met by more than one agency, for example, child and adolescent mental health services. If you're not sure if you should do this, your local authority may suggest this when you make the Prevent referral.

When you share information about a child or young person who is under 18, you should try to get parental consent, but only if it is safe to do so. Do not put the child or young person in more



danger. For more guidance, read 'informing the child, young person, parents or carers' in [making a referral to Prevent](#).

To find out more, read the [case studies](#), which involve different ideologies, issues, age ranges and examples of interventions.

### **High risk**

High risk means a learner is at significant risk. There's evidence that they're currently exposed to terrorist or extremist activity, and there's a significant risk to their safety.

If they're showing high risk, criminal behaviour, tell the police immediately.

High-risk, criminal behaviour includes:

- Verbally or physically attacking someone due to their race, religion, sexuality and so on
- Committing violent acts guided by a violent extremist ideology or group
- Taking part in any proscribed violent extremist group (financing, sharing material online, recruiting others and so on)
- Having a 'kill list' or detailed plan to carry out mass violence
- Producing or sharing terrorist material offline or online
- Recruiting others to a proscribed terrorist group or organisation

### **High risk: what to do**

You should ask yourself if the learner:

- Needs support from more than one agency
- Is about to put themselves or others in danger
- Is at risk due to the actions of their parents or carers, or wider family members
- Has made violent threats to the setting

Tell the police immediately if you suspect a learner:

- Is about to put themselves or others in danger by travelling to join a proscribed organisation, or
- Appears to be involved in planning to carry out a criminal offence

If you suspect a learner is likely to commit an attack on your setting, contact the police and local authority for immediate support.

## **Serious Violence**

Indicators, which may signal that a student is at risk of, or is involved with, serious violent crime. These may include:

- Increased absence
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate being approached by, or involved with, individuals associated with criminal networks or gangs

## **Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family an institutional, or community setting by those known to them or, more rarely, by others.

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Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.

## **Domestic Abuse**

Statistics have shown in the past few years that incidents of reported domestic abuse are on the rise in the UK, with 2.4 million victims last year\*. According to experts in this area, approximately 1 in every 5 adults in the UK will experience domestic abuse during their lifetime\*. Statistics from the National Centre for Domestic Violence

The Domestic Abuse Act 2021 applies to those aged 16 or over. 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, sexual 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).

**Personally connected** applies if:

- They are or have been married to each other
- They are or have been civil partners of each other
- They have agreed to marry one another (whether or not the agreement has been terminated)
- They have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- They are, or have been, in an intimate personal relationship with each other
- They each have, or there has been a time when they each have had, a parental relationship in relation to the same child
- They are relatives

### **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, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home

**Behaviour is "abusive" if it consists of any of the following:** and it does not matter whether the behaviour consists of a single incident or is a course of conduct.

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional or other abuse



**Controlling behaviour is:** a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

**Coercive behaviour is:** an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

This definition includes so-called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and it is clear that victims are not confined to one gender or ethnic group.

All children can **witness and be victims** and or 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 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.

## **Physical Abuse**

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a vulnerable person.

### **Possible Signs**

- Bruises and scratches to the face and head
- Pinch bruises or bite bruises
- Bruising around both eyes simultaneously
- Torn frenulum (skin linking the upper jaw and lip)
- Fingertip bruising on the front and back of the chest (gripping)
- Finger or hand marks on any part of the body
- Ligature marks on either the neck, the arms or the legs
- Cigarette burns
- Linear or shaped burns or bruises (e.g. iron/radiator)
- 'Non-cascade' scalds
- Head injury, there may be no outward sign of injury
- Poisoning
- Bald patches
- Recurrent unexplained/untreated injuries or lingering illness



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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Possible Behaviour</b> <ul style="list-style-type: none"> <li>• Explanation inconsistent with injury</li> <li>• Refusal to discuss injuries</li> <li>• Fear of going home or parents being contacted</li> <li>• Arms and legs are kept covered in hot weather, or for fear of undressing</li> <li>• Frozen watchfulness/cowering/flinching at sudden movements</li> <li>• Withdrawal from physical contact</li> <li>• Fear of medical help</li> <li>• Admission of excessive punishment</li> <li>• Running away</li> <li>• Self-destructive tendencies</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Emotional Abuse</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>Is persistent emotional maltreatment such as to cause severe and persistent adverse effects on the individual's emotional development? It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.</p> <p>It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), frequently causing frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p> | <b>Possible Signs</b> <ul style="list-style-type: none"> <li>• Speech delay, poor verbal ability, and lack of communication skills</li> <li>• Bedwetting, soiling (without physical cause)</li> <li>• Lack of concentration, learning problems</li> <li>• Unreasonable fear of new situations</li> <li>• Eating disorders (overeating and under-eating)</li> <li>• Inappropriate emotional responses to stressful situations</li> <li>• Low self-esteem</li> <li>• Self-mutilation</li> <li>• Alcohol, drugs, and solvent misuse</li> </ul> <b>Possible Behaviour</b> <ul style="list-style-type: none"> <li>• Over-reaction to mistakes</li> <li>• Obsessive behaviour (e.g. rocking, twisting hair, sucking thumb)</li> <li>• Withdrawal from relationships with other children</li> <li>• Fear of parents being contacted</li> <li>• Extremes of passivity or aggression</li> <li>• Attention seeking</li> <li>• Chronic running away</li> <li>• Compulsive stealing, scavenging for food or clothes</li> <li>• Impaired capacity to enjoy life</li> </ul> |



## Neglect

Is the persistent failure to meet an individual's basic physical and/or psychological needs likely to result in a serious impairment of health or development? Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical harm, external harm, or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

### Possible Signs

- Unkempt appearance, poor personal hygiene
- Poor skin/hair condition
- Drop through height/weight centiles
- Small stature (not a family characteristic)
- Constant tiredness
- Repeated accidents
- Untreated medical conditions
- Inappropriate clothing
- Constant hunger
- Frequent lateness or non-attendance at school
- Accidental self-poisoning

### Possible Behaviour

- Chronic running away
- Compulsive stealing
- Scavenging for food and clothes
- Low self-esteem
- Neurotic behaviour (e.g. rocking, thumb sucking, hair twisting)
- Inability to make social relationships
- Tendency to destroy things

## Sexual Abuse

Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children.

### Possible Signs

- Wetting and soiling themselves
- Sudden drop in College performance/poor concentration
- Obsessed with sexual matters as opposed to normal exploration
- Changes from being happy and active to being fearful and withdrawn
- Unexplained sources of money/gifts
- Urinary infections, bleeding or soreness in the

### Possible Behaviour

- Overly compliant behaviour
- Behaves in a sexually inappropriate way in relation to their age
- Withdrawn and unhappy, insecure and "clingy"
- Plays out sexual acts in too knowledgeable a way for their age
- Regresses to behavioural patterns of much younger children



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| <ul style="list-style-type: none"> <li>genital/anal areas</li> <li>• Vaginal discharge – vaginal warts</li> <li>• Soreness and bleeding in the throat</li> <li>• Chronic ailments, e.g. stomach pains, headaches, without an obvious cause</li> <li>• Eating disorders</li> <li>• Becomes severely depressed</li> <li>• Has a poor self-image</li> <li>• Uses drugs/alcohol to excess</li> <li>• Not allowed to have friends around or to go out on dates</li> <li>• Fearful of undressing for physical education</li> <li>• Venereal infection</li> <li>• Pregnancy</li> <li>• Prostitution</li> </ul> | <ul style="list-style-type: none"> <li>• Say of themselves that they are bad or wicked</li> <li>• Arriving early at school/College and leaving late with few, if any, absences</li> <li>• Excessive masturbation – exposing themselves</li> <li>• Drawings of a sexually explicit nature</li> <li>• Attempts to sexually abuse another child</li> <li>• Recurring nightmares and/or fear of the dark</li> <li>• Had a “friend who has a problem” and then tells about the abuse of “a friend”</li> <li>• Self-mutilation/attempted suicide</li> <li>• Running away</li> </ul> |
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### Child on Child/Peer on Peer Abuse

Children and young people who are lesbian, gay, bisexual, or transitioning (LGBTQ+) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Additionally, children can be targeted because of family or friendship associations.

LGBTQ+, or those perceived to be LGBTQ+, are potentially vulnerable to all forms of peer-on-peer abuse. The different forms peer on peer-on-peer abuse can take, such as:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers
- 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 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 engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth-produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; 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)



## Upskirting

The Voyeurism (Offences) Act, 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 gender can be a victim.

## Sexual Violence and Sexual Harassment

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) attend the same 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.

Children's sexual behaviour exists on a wide continuum, 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 between the two. HSB should be considered in a child protection context. When considering HSB, ages and the stages of development of the children are critical factors.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if

One of the children is pre-pubescent, and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector

When referring to **sexual violence**, we are referring to sexual offences under the Sexual Offences Act 2003<sup>14</sup> 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.

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**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, and B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour, so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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 (colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

**Online sexual harassment.** This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges), taking and sharing nude photographs of U18s is a criminal offence
- Sharing of unwanted explicit content
- Upskirting is a criminal offence.
- Sexualised online bullying
- Unwanted sexual comments and messages, including on social media
- Sexual exploitation, coercion, and threats

## **Sexual Contact and Consent**

**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 engage in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or 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

Whilst the age of consent for sexual intercourse in the UK is 16, young people may be engaging in sexual activity, including intercourse, before this age. This sexual activity may be "consensual"



or it may involve the use of power by one young person over another. In order to determine whether the relationship presents a risk to the young person, the following factors should be considered.

**This list is not exhaustive, and other factors may need to be considered:**

- Whether the young person is competent to understand and consent to the sexual activity in which he/she is involved in. The law states that a young person below the age of 13 is incapable of giving consent to sexual activity, and this must be referred;
- The nature of the relationship between those involved, particularly if there are age or power imbalances as outlined below;
- Whether overt aggression, coercion or bribery was involved, including misuse of substances/alcohol as a disinhibitor;
- Whether the young person's behaviour, for example, is through the misuse of substances, including alcohol, places him/her in a position where he/she is unable to make an informed choice about the activity;
- Any attempts to secure secrecy by the sexual partner beyond what would be considered usual in a teenage relationship;
- Whether the sexual partner is known by the agency for having relationships with similar young people, which causes concern;
- Whether the young person denies, minimises or accepts concerns;
- Whether sex has been used to gain favours (e.g. swap sex for mobile phones, cigarettes, clothes, trainers, alcohol, drugs, etc);
- Whether the young person has a lot of money or other valuable things which cannot be accounted for

### **Young Carers**

The group recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend who is ill, disabled or misuses drugs or alcohol, can increase their vulnerability and that they may need additional support and protection.

### **Substance Misusing Parents and Carers**

It is estimated that around 700,000 children aged between 10 and 17 are living with one or two alcohol-dependent parents in the UK. Alcohol problems often become a family secret, hidden from the outside world. This leaves children isolated and alone, with no one to turn to.

**Possible indicators** that a child or young person is living with an adult who is misusing substances:

- Low self-esteem, Lack of confidence
- Feeling unsafe;
- Difficulty trusting adults
- Taking on a caring role for parents/siblings
- Problems with concentration, attention, learning and attainment
- Behavioural problems (especially in boys)
- Erratic attendance or lateness
- Self-harming behaviour
- Risk-taking behaviour
- Increased likelihood of problematic alcohol use



## **Children Misusing Drugs or Alcohol**

The discovery that a student is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings, but the school will consider such action in the following situations:

When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse, such as sexual abuse
- To believe the pupil's substance-related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults
- Where the misuse is suspected of being linked to parent/carer substance misuse
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance-associated criminality

## **Privately Fostered Children**

Private fostering is when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, a person with parental responsibility for them or a relative in their own home for 28 days or more.

## **Children who have returned home to their families from care**

The Group recognises that a previously looked-after child potentially remains vulnerable. The Group will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern.

## **Children who have Family Members in Prison**

Approximately 350,000 children in England and Wales have a parent sent to prison each year. Around 10,000 visits are made by children to prisons each week. These children are at risk of poor outcomes, including poverty, stigma, isolation and poor mental health.

They will be experiencing the effects of loss and separation, confusion and feeling torn between loving their parents and hating what they've done. They may have to take on additional responsibilities at home, including caring for siblings. There may be stress and anxiety at home about money and the security of their home.

## **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. Making child arrangements via the family courts following a separation can be stressful and entrench conflict in families. This can be stressful for children.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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.



## Children frequently absent from the Education

It is recognised that children who have unexplainable and or persistent absences from education including repeat occasions and/or prolonged periods can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

On average, around 80 children/young people go missing in Cambridgeshire every month, and around 60 in Peterborough.

### Why do children go missing?

- Problems at home - ranging from arguments with parents or carers to long-term abuse or maltreatment
- Family break-up where young people are drawn into their parents' conflict
- Mental health problems
- Bullying, racism and racial harassment, homophobia
- Teenage pregnancy
- Wanting to be near friends or family - especially where a young person is in care, and there are problems with contact
- Grooming for sexual exploitation - evidence indicates that 90% of children subject to sexual exploitation go missing at some point
- Child trafficking - young people may go missing when they are being trafficked
- Forced Marriage - some young people may run away because they are at risk of or in a forced marriage

### The immediate risks associated with going missing include:

- No means of support or legitimate income, leading to high-risk activities
- Involvement in criminal activities
- Victim of Abuse
- Victim of crime, for example, through sexual assault and exploitation
- Alcohol/substance misuse
- Deterioration of physical and mental health;
- Missing out on schooling and education;
- Increased vulnerability

### Longer-term risks include:

- Long-term drug dependency/alcohol dependency
- Crime
- Homelessness
- Disengagement from education
- Child sexual exploitation
- Poor physical and/or mental health
- Children and young people who run away and go missing are also likely to be missing from education. Some children missing education may also be missing from home

## Misinformation, disinformation (including fake news) and conspiracy theories

**Disinformation** is the deliberate creation and spread of false or misleading content, such as fake news.

**Misinformation** is the unintentional spread of this false or misleading content (Cabinet Office, Department for Science, Innovation and Technology, 2023).

**A conspiracy theory** is a belief that some secret but influential organisation or interested parties are responsible for an event or phenomenon.