

	Date	Signed
Written by: J Parkhouse	15.04.2025	<i>JL Parkhouse</i>
Review 1 Due:	Date	Signed
Review 2 Due:	Date	Signed
Review 3 Due:	Date	Signed



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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Owner	Joanne Parkhouse	IncludEd-UK@outlook.com 07984041071



ROLE/ORGANISATION	NAME	CONTACT DETAILS
Local authority designated officer (LADO)		<p>CFS-LADO@leics.gov.uk</p> <p>0116 305 4141</p> <p>(Please note that the LADO service is available office hours only: Monday-Thursday, 8.30am-5.00 pm and Friday, 8.30am-4.30pm)</p> <p>Outside of office hours, please contact the Leicestershire First Response Young people's Duty Team.</p> <p>Tel: 0116 305 0005)</p>
Channel helpline		020 7340 7264

1. Aims

The organisation aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote young people’s welfare

2. Legislation and statutory guidance

This policy is based on the Department for Education’s statutory guidance [Keeping Young people Safe in Education \(2021\)](#) and [Working Together to Safeguard Young people \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on organisations and local authorities to safeguard and promote the welfare of young people

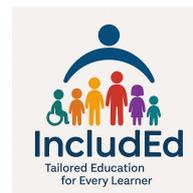
[The Young people Act 1989 \(and 2004 amendment\)](#), which provides a framework for the care and protection of young people

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty to report to the police where it is discovered that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with young people

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to young people



Statutory guidance on the Prevent duty, which explains organisations' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Young personcare (Disqualification) and Young personcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Young personcare Disqualification Regulations") and Young personcare Act 2006, which set out who is disqualified from working with young people

3. Definitions

Safeguarding and promoting the welfare of young people means:

Protecting young people from maltreatment

Preventing impairment of young people's mental and physical health or development

Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all young people to have the best outcomes

Young person protection is part of this definition and refers to activities undertaken to prevent young people suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a young person, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where young people share nude or semi-nude images, videos or live streams.

Young people includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Young people Safe in Education (and defined in the Young people Act 2004, as amended by chapter 2 of the Young people and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local young people, including identifying and responding to their needs:

The local authority (LA)

A clinical commissioning group for an area within the LA

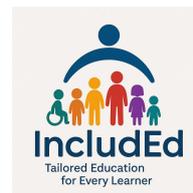
The chief officer of police for a police area in the LA area

4. Equality statement

Some young people have an increased risk of abuse, and additional barriers can exist for some young people with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise young people's diverse circumstances. We ensure that all young people have the same protection, regardless of any barriers they may face.

We give special consideration to young people who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers



- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member’s mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from mainstream education to be home educated

5. Roles and responsibilities

Safeguarding and young person protection is **everyone’s** responsibility. This policy applies universally in the work carried out by IncludEd.

5.1 All staff

Part 1 and annex B of the Department for Education’s statutory safeguarding guidance, [Keeping Young people Safe in Education](#), will be read, understood and reviewed at least annually.

Awareness of this policy and the implications of it will be at the forefront of working practices.

Awareness of the early help process (sometimes known as the common assessment framework) and our role in it, including identifying emerging problems and sharing information with other professionals to support early identification and assessment, will be at the forefront of working practices at all times.

We will be aware of the process for making referrals to local authority young people’s social care and for statutory assessments that may follow a referral, including the role we might be expected to play in these cases.

We will ensure we are aware of what to do if a safeguarding issue arises or a young person tells us they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

We are knowledgeable about the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, young person sexual exploitation (CSE), young person criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

We are aware of the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

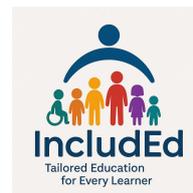
Section 15 and appendix 4 of this policy outline this in more detail.

5.2 The Owner and Designated Safeguarding Lead

Our Owner and DSL, who is vigilant regarding young person protection and wider safeguarding for the young people accessing any services from the organisation.

During operational periods, Joanne Parkhouse will be available for consultation, to discuss any safeguarding concerns.

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Outside of operational hours, she can be reached via email at: joanne@included-education.co.uk or via phone on 07984041071. Concerns can also be emailed directly to the DSL using the dedicated safeguarding address: safeguarding@included-education.co.uk. Phone calls should be used as a priority when trying to make contact and emails that contain specific data relating to young people must be sent securely via Egress. The Local Authority LADO must be contacted should you be unable to gain a response from Joanne Parkhouse.

Joanne Parkhouse will always:

- liaise with local authority case managers and designated officers for young person protection concerns as appropriate.
- Work in line with GDPR good working practices
- Evaluate and approve this policy at each review, ensuring it complies with the law.
- Communicating this policy to clients

The Local Authority LADO will investigate in the event that an allegation of abuse is made against the Owner/DSL, where appropriate (see appendix 3).

6. Confidentiality

IncludEd ensures all data pertaining to the young people and that of their contacts is kept confidential and only shared with relevant parties with whom we are working closely to ensure a joined-up provision, with the exception of where data sharing is paramount for safeguarding purposes.

- Personal data is kept separate in order to prevent data breaches.
- IncludEd ensures, where necessary and appropriate, information is shared in a timely manner in order to facilitate effective safeguarding is carried out
- Fears about sharing information will not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of young people. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping young people safe
- If we need to share 'special category personal data', the DPA 2018 contains 'safeguarding of young people and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a young person at risk
- We will never promise a young person that they will not tell anyone about a report of abuse, as this may not be in the young person's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support us to make decisions about sharing information
- If we are in any doubt about sharing information, we will consult with the appropriate LADO or First Response Team (if out of hours)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against us in appendix 3

7. Recognising abuse and taking action

We must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a young person is suffering or likely to suffer harm, or in immediate danger



Make a referral to the young people's social care and/or the police **immediately** if we believe a young person is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.** IncludEd is covered by Leicestershire Local Authority Safeguarding Partnership. Anyone can follow their procedure for reporting a concern here: <https://www.leicestershire.gov.uk/leisure-and-community/community-safety/report-abuse-or-neglect-of-a-young-person>

There is further government guidance here:

<https://www.gov.uk/report-young-person-abuse-to-local-council>

7.2 If a young person makes a disclosure

If a young person discloses a safeguarding issue, we will:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that we are shocked or upset
- Tell the young person they have done the right thing in telling us. Do not tell them they should have told us sooner
- Explain what will happen next and that we will have to pass this information on. Do not promise to keep it a secret
- Write up the conversation as soon as possible in the young person's own words. Stick to the facts, and do not put any judgement on it
- Sign and date the write-up and pass it on to the LADO. Alternatively, if appropriate, make a referral to young people's social care and/or the police directly (see 7.1), and tell the LADO as soon as possible that you have done so. Aside from these people, we will not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

7.3 If we discover that FGM has taken place or a pupil is at risk of FGM

Keeping Young people Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of young person abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a young person has already been subjected to FGM, and factors that suggest a young person may be at risk, are set out in appendix 4 of this policy.

Anyone who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and professionals will face disciplinary sanctions for failing to meet it.

Unless specifically told not to disclose, we should also involve young people's social care as appropriate.

Anyone who discovers that an act of FGM appears to have been carried out on a **young person under 18** must follow our local safeguarding procedures.

The duties mentioned above do not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. No examination of young people should take place.

Anyone who suspects a young person is *at risk* of FGM or suspects that FGM has been carried out must follow our local safeguarding procedures.



<https://www.leicestershire.gov.uk/leisure-and-community/community-safety/report-abuse-or-neglect-of-a-young-person>

7.4 If we have concerns about a young person (as opposed to believing a young person is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if there are any concerns about a young person's welfare.

Where possible, speak to the DSL first to agree a course of action.

Take advice from local authority young people's social care. Advice can also be sought at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority young people's social care directly, if appropriate (see 'Referral' below).

Early help

If early help is appropriate, we will liaise with other agencies and inter-agency assessments as appropriate. We may be required to support other agencies and professionals in an early help assessment.

<https://resources.leicestershire.gov.uk/education-and-young-people/young-person-protection-and-safeguarding/early-help>

Referral

If it is appropriate to refer the case to local authority young people's social care or the police, we will make the referral.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. We must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the young person's situation does not seem to be improving after the referral, we must follow local escalation procedures to ensure concerns have been addressed and that the young person's situation improves.

https://www.proceduresonline.com/llr/young-personcare/leicestershire/user_controlled_lcms_area/uploaded_files/40.%202019%2004%2029%20IRO%20Practice%20Learning%20Escalation%20Guidance.pdf

7.5 If there are concerns about extremism

Advice will be sought from local authority young people's social care. Make a referral to local authority young people's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, referrals could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority young people's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which can be consulted to raise concerns about extremism with respect to a young person in education. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if it conceivable someone is in immediate danger or someone may be planning to travel to join an extremist group or if something is seen/heard that may be terrorist-related

7.6 If there is a mental health concern

Mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

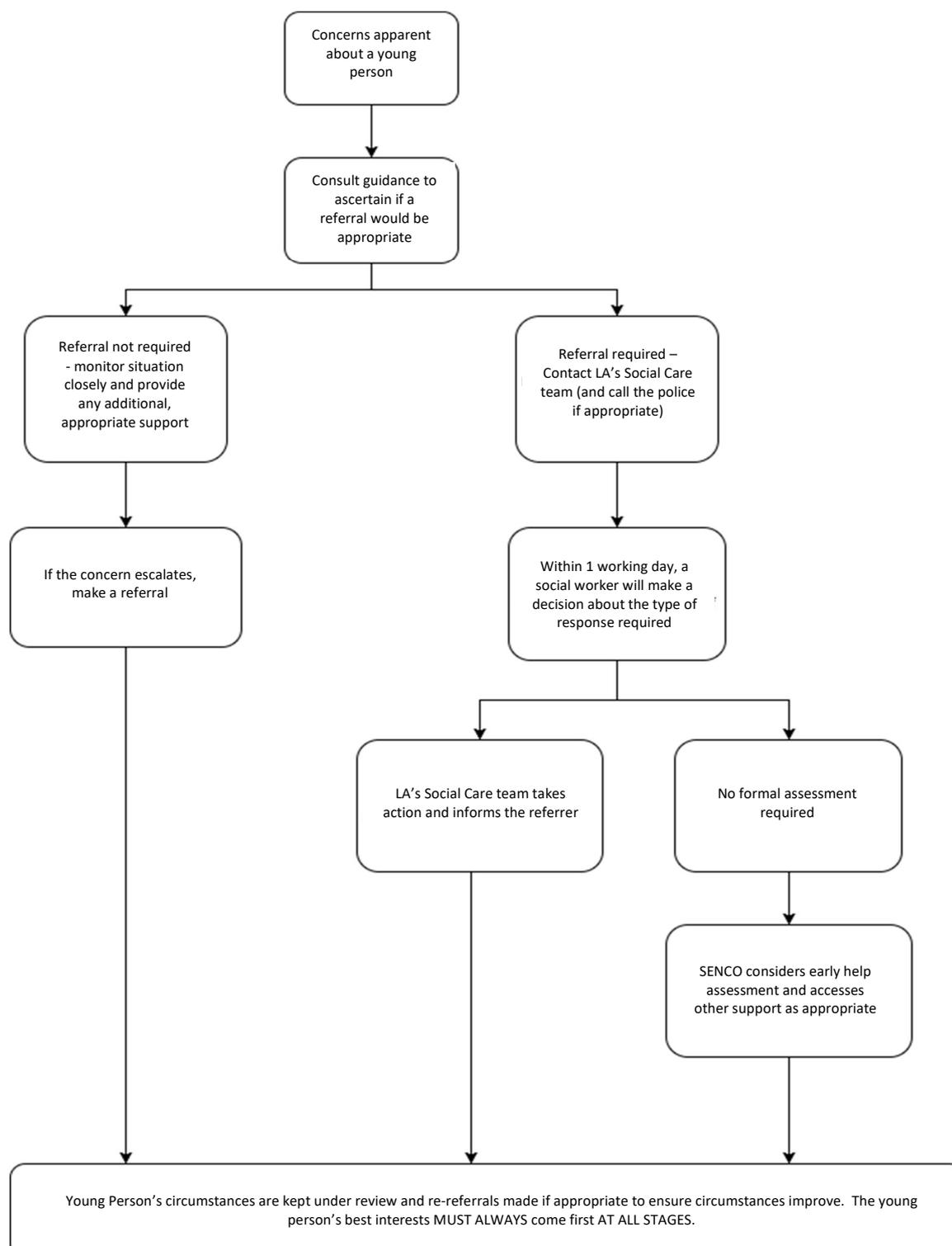


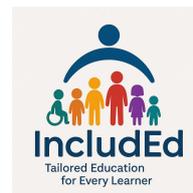
We will be alert to behavioural signs that suggest a young person may be experiencing a mental health problem or be at risk of developing one.

If we have a mental health concern about a young person that is also a safeguarding concern, immediate action will be taken by following the steps in section 7.4.

Refer to the Department for Education guidance on [mental health and behaviour in organisations](#) for more information.

Figure 1: procedure if you have concerns about a young person’s welfare (as opposed to believing a young person is suffering or likely to suffer from harm, or in immediate danger)





7.7 If you have concerns about IncludEd, or an allegation is made about us posing a risk of harm to young people, speak to Local Authority LADO **immediately**.

7.8 Allegations of abuse made against other young people

We recognise that young people are capable of abusing their peers. Abuse will never be tolerated or passed off as this can lead to a culture of unacceptable behaviours and unsafe environments for young people.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

This young person protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put young people at risk
- Is violent
- Involves young people being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about peer-on-peer abuse.

Procedures for dealing with allegations of peer-on-peer abuse

If a young person makes an allegation of abuse against another young person:

This will be recorded but not investigated further at this point.

We will contact the local authority young people's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

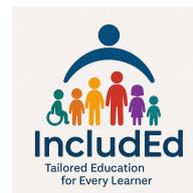
We will contact the young people and adolescent mental health services (CAMHS), if appropriate

Minimising the risk of peer-on-peer abuse

- We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour that we are made aware of, including the requesting of or sending of sexual images
- Reassure victims that they are being taken seriously
- We are aware of and understand:
 - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
 - That if they have any concerns about a young person's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Young people can show signs or act in ways they hope adults will notice and react to
 - A close contact may make a report



- A conversation may be overheard
- A young person's behaviour might indicate that something is wrong
- That certain young people may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a young person harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy

7.9 Sharing of nudes and semi-nudes ('sexting')

Our responsibilities when responding

If we are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), we must report it to the Local Authority Social Care Team immediately, and the police if this is deemed necessary/appropriate.

We will **not**:

- View, copy, print, share, store or save the imagery, or ask for it to be shared or download (if we have already viewed the imagery by accident, we will report this to the Social Care Team immediately)
- Delete the imagery or ask the young person to delete it
- Ask the young person(s) involved in the incident to disclose information regarding the imagery (this is our responsibility)
- Share information about the incident with others who are not part of the multi-agency safeguarding team (MASH)
- Say or do anything to blame or shame any young people involved

We will explain that will need to report the incident, and reassure the young person(s) that they will receive support and help.

Information will be shared with the parent(s)/carer(s) as long as this is not deemed inappropriate for some reason.

We will make an immediate referral to police and/or young people's social care if:
The incident involves an adult

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

What we know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

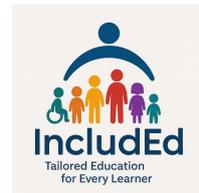
The imagery involves sexual acts and any young person in the images or videos is under 13

We have reason to believe a young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then we may decide to respond to the incident without involving the police or young people's social care by liaising closely with the young person's primary carer(s) and providing ongoing support while keeping the situation under review. The decision will be made and recorded in line with the procedures set out in this policy.

Further review

If a decision has been made not to refer to police and/or young people's social care, we will conduct a further review to establish the facts and assess the risks.



We will hold interviews with the young people involved (if appropriate).

If at any point in the process there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to young people's social care and/or the police immediately.

Informing parents/carers

We will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the young person at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through local neighbourhood police.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding young people from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our organisation aims to:

- Be aware of the online safety of young people, staff and volunteers
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as young people or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as 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; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Make sure we are aware of any restrictions with regards to the use of our mobile phones and cameras, for example that:

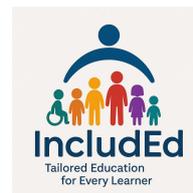
- We are allowed to bring our personal phones to work for our own use
- We will not take pictures or recordings of young people on our personal phones or cameras

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a young person with the young person's parents or carers. We will normally do this in the event of a suspicion or disclosure.

If we believe that notifying the parents or carers would increase the risk to the young person, we will discuss this with the local authority young people's social care team before doing so.

In the case of allegations of abuse made against other young people, we will normally notify the parents or carers of all the young people involved.



10. Young people with special educational needs, disabilities or health issues

We recognise that young people with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's condition without further exploration

Young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other young people

The potential for young people with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in managing or reporting these challenges

11. Young people with a social worker

Young people may need a social worker due to safeguarding or welfare needs. We recognise that a young person's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating additional barriers to engagement, learning, behaviour and mental health.

We will work with and support social workers to help protect vulnerable young people.

Where we are aware that a pupil has a social worker, we will always consider this fact to ensure any decisions are made in the best interests of the young person's safety, welfare and holistic outcomes.

12. Looked-after and previously looked-after young people

We will ensure that we have the skills, knowledge and understanding to keep looked-after young people and previously looked-after young people safe. In particular, we will ensure that:

We have relevant information about young people's looked after legal status, contact arrangements and parental responsibility status as well as any care arrangements

We have details of young people's social workers and relevant virtual organisation heads

Joanne Parkhouse (Owner, DSL), will promote the appropriate provision of looked-after young people and previously looked-after young people in line with statutory guidance.

As part of our role, where appropriate, we will:

- Work with virtual organisation heads to promote the educational achievement of looked-after and previously looked-after young people, including discussing how pupil premium plus funding can be best used to support looked-after young people and meet the needs identified in their personal education plans

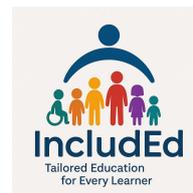
13. Complaints and concerns about organisation safeguarding policies

13.2 Issues with company practices:

Areas of malpractice or wrongdoing are covered by the procedures are:

- Issues with the recording and reporting procedures
- Issues with the content of reports and how they are compiled
- Issues with the actions taken by the company

The procedure for reporting a concern is:



1. Refer to LADO or the Local Authority Team (Leicestershire)

14. Record-keeping

We will hold records in line with our Data Protection Policy.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing.

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved

A note of any action taken, decisions reached and the outcome

Concerns and referrals will be separate from young person's general files and passed immediately to the MASH/LA Social Care Team/Police.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Further information about your safeguarding record-keeping arrangements:

Records are completed as a hard copy

Where records contain information about allegations of sexual abuse, we will preserve them for the Independent Inquiry into Young person Sexual Abuse (IICSA), for the term of the inquiry.

All other safeguarding records will be passed immediately to the MASH/LA Social Care Team/Police and not held at the company

Joanne Parkhouse is responsible for sharing records with other agencies (in accordance with the Data Protection Act 2018 and GDPR principles).

Records will only be shared securely to appropriate and necessary parties.

15. Training

15.1 We will

We will undertake safeguarding and young person protection training to ensure we understand the organisation's safeguarding systems and responsibilities, and can identify signs of possible abuse or neglect.

Be in line with advice from the 3 safeguarding partners

We will have training on the government's anti-radicalisation strategy, Prevent, to enable us to identify young people at risk of being drawn into terrorism and to challenge extremist ideas.

15.4 Recruitment – interview panels

At least one person conducting any interview for any post at the organisation will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Young people Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16. Monitoring arrangements

This policy will be reviewed **annually** by Joanne Parkhouse (Owner, DSL) and checked accordingly.

17. Links with other policies

GDPR





These appendices are based on the Department for Education's statutory guidance, Keeping Young people Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the young person's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.

Emotional abuse may involve:

Conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people

Sexual abuse involves forcing or enticing a young person or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person 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

Non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person 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 young people.

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a young person is born, neglect may involve a parent or carer failing to:

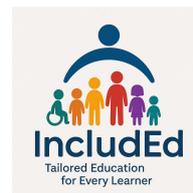
Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a young person from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.



Appendix 2: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Young people Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with young people have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of young people.

Advertising

When advertising roles, we will make clear:

Our organisation's commitment to safeguarding and promoting the welfare of young people

That safeguarding checks will be undertaken

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with young people

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to young people (where the role involves this type of regulated activity)

Include a copy of, or link to, our young person protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

Consider any inconsistencies and look for gaps in employment and reasons given for them

Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with young people, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history



We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

Not accept open references

Liaise directly with referees and verify any information contained within references with the referees

Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is organisation based, we will ask for the reference to be confirmed by the Owner/principal as accurate in respect to disciplinary investigations

Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

Secure a reference from the relevant employer from the last time the candidate worked with young people if they are not currently working with young people

Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

Explore any potential areas of concern to determine the candidate's suitability to work with young people

Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the organisation's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

Verify their identity

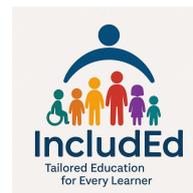
Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Verify their professional qualifications, as appropriate



Ensure they are not subject to a prohibition order if they are employed to be a staff

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Young personcare Disqualification Regulations and Young personcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

Responsible, on a regular basis in a organisation or college, for teaching, training, instructing, caring for or supervising young people; or

Carrying out paid, or unsupervised unpaid, work regularly in a organisation or college where that work provides an opportunity for contact with young people; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

There are concerns about an existing member of staff's suitability to work with young people; or

An individual moves from a post that is not regulated activity to one that is; or

There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a young person or vulnerable adult where:

We believe the individual has engaged in relevant conduct; or

We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a young person or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

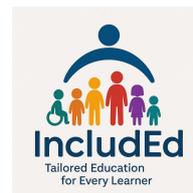
We do not use agency or any third-party staff

Contractors

We do not use externally contracted staff

Volunteers

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We do not use volunteer staff

Appendix 3: allegations of abuse made against us

Section 1: allegations that may meet the harms threshold

This section is based on ‘Section 1: Allegations that may meet the harms threshold’ in part 4 of Keeping Young people Safe in Education.

This section applies to all cases in which it is alleged that we have:

- Behaved in a way that has harmed a young person, or may have harmed a young person, and/or
- Possibly committed a criminal offence against or related to a young person, and/or
- Behaved towards a young person or young people in a way that indicates he or she may pose a risk of harm to young people, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with young people – this includes behaviour taking place both inside and outside of organisation

Allegations must be made directly to the designated officer at the Local Authority immediately.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

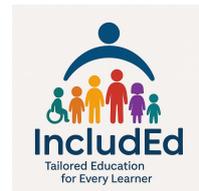
Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Designated Officer at the Local Authority will take the following steps:

Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

Discuss the allegation with any appropriate members of the MASH. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or young people’s social care services. (The designated officer may, on occasion, consider it necessary to involve the police *before* consulting the MASH – for example, if the accused individual is deemed to be an immediate risk to young people or there is evidence of a possible criminal offence. In such cases, the designated officer will notify the MASH as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the MASH. Where the police and/or young people’s social care services are involved, the designated officer will only share such information with the individual as has been agreed with those agencies



Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with young people is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the MASH as appropriate

If immediate suspension is considered necessary, agree and record the rationale for this with the MASH. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the MASH what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the MASH to initiate the appropriate actions.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the young person/young people involved about the allegation as soon as possible if they do not already know (following agreement). The designated officer will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against the organisation (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of the organisation will be advised to seek legal advice

Keep the parents or carers of the young person/young people involved informed of the progress of the case (only in relation to their young person – no information will be shared regarding the organisation)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a young person

Timescales

Allegations should be dealt with as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

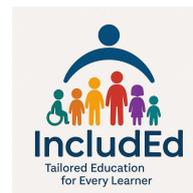
If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The Designated Officer will discuss whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or young people's social care services.



Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the organisation ceases services, the Designated Officer will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

The Designated Officer will also consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting teaching.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the Designated Officer will consider the appropriate next steps. If they consider that the young person and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to young people's social care may be appropriate

Shown to be deliberately invented, or malicious, the organisation will consider whether any further action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO will consider the appropriate next steps. If they consider that the young person and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to young people's social care may be appropriate

Shown to be deliberately invented, or malicious, the organisation will consider whether any further action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The organisation will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Advice will be sought from the LADO, police and young people's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a young person/young people involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

Clear records will be kept about any case where the allegation or concern meets the criteria above and stored for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted (unless the individual consents for the records to be retained).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference



Where records contain information about allegations of sexual abuse, they will be preserved for the Independent Inquiry into Young person Sexual Abuse (IICSA), for the term of the inquiry.

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Young people Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply staffs, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

Suspicion

Complaint

Disclosure made by a young person, parent or other adult within or outside the organisation

Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of young people.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult in the organisation may have acted in a way that:

Is inconsistent with good staff conduct, including inappropriate conduct outside of the service role, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

Being overly familiar with young people

Having favourite clients

Taking photographs of young people on personal mobile phones

Engaging with a young person on a one-to-one basis in a secluded area or in a secretive manner

Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage the sharing of low-level concerns so that they can be addressed appropriately.

Responding to low-level concerns

All evidence will be collected and reviewed

The Owner will address the concerns directly and inform the complainant of further channels with which to escalate it should they be unhappy with the response.

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Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

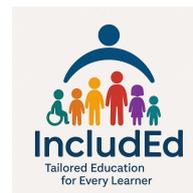
Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

References

We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance



Appendix 4: specific safeguarding issues

Young people missing from education

A young person going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or young person criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a young person may become missing from education, but some young people are particularly at risk. These include young people who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a organisation
- Come from new migrant families

We will follow our procedures to help identify the risk of abuse and neglect, including sexual exploitation. This includes informing the local authority if a young person with an EHCP has no agency/setting monitoring their case.

We will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If it is suspected that a young person is suffering from harm or neglect, we will follow local young person protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority young people's social care team, and the police, if the young person is suffering or likely to suffer from harm, or in immediate danger.

Young person criminal exploitation

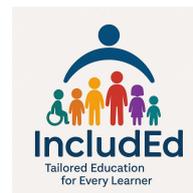
Young person criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and young people or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a young person:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation



Suffering from changes in emotional wellbeing

Misusing drugs and alcohol

Going missing for periods of time or regularly coming home late

Regularly missing organisation or education

Not taking part in education

If we suspect CCE, we will discuss this with the MASH. The MASH will advise and trigger the local safeguarding procedures, if appropriate.

Young person sexual exploitation

Young person sexual exploitation (CSE) is a form of young person sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and young people or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Young people or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a young person:

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

If we suspect CSE, we will discuss this with the MASH. The MASH will trigger the local safeguarding procedures, if appropriate.

Domestic abuse

Young people can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result.

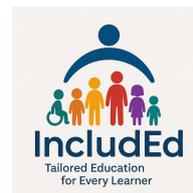
Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and young person/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on young people.

Procedures will be followed which are part of Operation Encompass

Homelessness

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

The organisation will be aware of contact details and referral routes in to the local housing authority so we can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a young person has been harmed or is at risk of harm, we will also make a referral to young people's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a young person being at risk of HBA or already having suffered it. If there are concerns around HBA, we will activate local safeguarding procedures.

FGM

The organisation will be alert to young people affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

A young person confiding in a professional that FGM has taken place

A mother/family member disclosing that FGM has been carried out

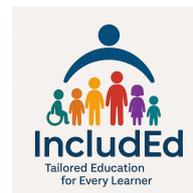
A family/young person already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a young person may be at risk of FGM include:

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)



FGM being known to be practised in the girl's community or country of origin

A parent or family member expressing concern that FGM may be carried out

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a staff or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other young people about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent
- Having sections missing from her 'red book' (young person health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

We will be aware of the indicators of forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If we suspect that a young person is being forced into marriage, we will speak to the young person about our concerns in a secure and private place. We will then report this to the MASH.

The organisation will:

Speak to the pupil about the concerns in a secure and private place

Activate the local safeguarding procedures and refer the case to the local authority's designated officer

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk

Refer the young person to the relevant LA Team/education welfare officer as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups



Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Organisations have a duty to prevent young people from being drawn into terrorism.

We will have an understanding of the potential risks in the local area, and seek advice from our local safeguarding partners and local police force where necessary.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Radicalisation can occur quickly or over a long period.

We will be alert to changes in young people's behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

Refusal to engage with, or becoming abusive to, peers who are different from themselves

Becoming susceptible to conspiracy theories and feelings of persecution

Changes in friendship groups and appearance

Rejecting activities they used to enjoy

Converting to a new religion

Isolating themselves from family and friends

Talking as if from a scripted speech

An unwillingness or inability to discuss their views

A sudden disrespectful attitude towards others

Increased levels of anger

Increased secretiveness, especially around internet use

Expressions of sympathy for extremist ideologies and groups, or justification of their actions

Accessing extremist material online, including on Facebook or Twitter

Possessing extremist literature

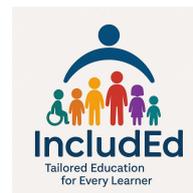
Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Young people who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – we will have confidence in their instincts and seek advice if something feels wrong.

If we are concerned about a pupil, we will follow our procedures set out in section 7.5 of this policy.

We will **always** take action if they are worried.

Peer-on-peer abuse



Peer-on-peer abuse is when young people abuse other young people. This type of abuse can take place inside and outside of organisation and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

Bullying (including cyber-bullying, 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 to engage in sexual activity with a third party

Consensual and non-consensual sharing of nudes and semi nudes 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

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)

Where young people abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If we have any concerns about peer-on-peer abuse, or a young person makes a report of it, we will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our organisation's approach to this type of abuse.

Serious violence

Indicators which may signal that a young person is at risk from, or involved with, serious violent crime may include:

Increased absence/engagement

Change in friendships or relationships with older individuals or groups

Significant decline in performance

Signs of self-harm or a significant change in wellbeing

Signs of assault or unexplained injuries

Unexplained gifts or new possessions (this could indicate that the young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

Being male

Having been frequently absent or permanently excluded from any organisation

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Having experienced young person maltreatment

Having been involved in offending, such as theft or robbery

We will be aware of these indicators and risk factors. If we are concerned for an individual, we will seek advice from the MASH.

