



# Safeguarding Policy

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**Protected**

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Whom applicable to:	All Futures Staff, Customers, Learners and Subcontractors

**Approval of policy (including revisions if required)**

Name	Position	Signature (if required)	Policy Version No.	Date
Sandra Cowley	Director Strategy Growth and Partnerships	N/A	V1 2021	03/09/2021
Sandra Cowley	Director Strategy Growth and Partnerships	N/A	V1 2022	

All policies are located in the policy zone of the intranet.

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## 1. Policy Statement

- 1.1. For information: The Futures Group – which we'll refer to as 'Futures' in this policy – is made up of a number of related brands and businesses: Futures for You, Futures for Business and Futures Employment Solutions. To keep things simple throughout this document, 'we' and 'us' means the Group and its brands.
- 1.2. This policy outlines Futures' commitment and role in safeguarding and promoting the welfare of children, young people and adults at risk in all aspects of our work. It applies to all our staff and our subcontractors and clearly set out their responsibilities and the need to act promptly when dealing with allegations or suspicions of abuse or neglect.
- 1.3. It describes our contribution to local authority policies and national protocols on providing safe environments for children, young people and adults at risk. It also includes our role within The Prevent Duty which is to challenge and support customers who are vulnerable to radicalisation.
- 1.4. Failure to comply with this policy will result in an investigation and the company disciplinary procedures being instigated against staff if there has been a breach.

## 2. Overall Aim and Objectives

- 2.1 Futures is committed to safeguarding the welfare of all learners, customers and other service users with whom we work. We will seek to employ staff who promote safeguarding by treating children, young people and adults at risk with care and respect and by protecting their dignity at all times.  
**See Annex 1 Safeguarding Guidelines** for definitions of children, young people and adults at risk.
- 2.2 We recognise that all people regardless of age, disability, gender identity, race, religious beliefs, sex, sexual orientation, marriage/civil partnership or pregnancy/maternity have an equal right to protection from all types of harm or abuse.  
**See Annex 1 Safeguarding Guidelines** for definitions of abuse and neglect.
- 2.3 **SAFEGUARDING IS EVERYBODY'S** Responsibility. All staff will work together to prevent and minimise abuse. If we have concerns that someone is being abused our loyalty to the person at risk comes first.
- 2.4 **DOING NOTHING IS NOT AN OPTION** – If we know or suspect that a person is being abused, all staff have a duty to report any concerns to their line manager and/or the nominated manager/designated person immediately as outlined in the Futures procedures.
- 2.5 Futures recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote customers and learners' welfare and protect them from harm. This includes contributing to processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

- 2.6 It is a requirement for all subcontractors to have their own safeguarding policies and procedures in place and to have due regard of the procedures in this policy depending on the contract they are delivering on behalf of Futures. Specific safeguarding requirements will be written into individual contracts with subcontractors where applicable.
- 2.7 Subcontractors not adhering to safeguarding practices and principles included in their contracts will be in breach and contracts will be withdrawn.
- 2.8 Futures assesses the risk and issues in the wider community when considering the wellbeing and safety of its customers, learners, and staff.

We will endeavour to safeguard children, young people, and adults at risk by:

- 2.8.1. Ensuring that safeguarding underpins the way we organise, deliver, and manage services
- 2.8.2. Ensuring that all staff in contact with children, young people and adults at risk have successfully passed through appropriate safer recruitment checks e.g., DBS (Disclosure and Barring Service)
- 2.8.3. Ensuring that all staff in contact with children, young people and adults at risk are aware of the professional and personal boundaries for their work e.g., recording information, not using personal mobile telephones or home email accounts to contact customers.
- 2.8.4. Ensuring contracts are managed to secure a safe and supportive environment for all
- 2.8.5. Raising the awareness and knowledge of our staff about the importance of safeguarding
- 2.8.6. Raising awareness to children, young people, and adults at risk to recognise when they are at risk and how to get help when they need it.
- 2.8.7. Encourage customers and learners to talk openly and we will ensure that customers and learners wishes are taken into account when determining what safeguarding action to take and what services to provide.
- 2.8.8. At Futures Apprentices and learners are taught about Safeguarding and the Prevent Duty through curriculum activity, resources, and online activity.
- 2.8.9. Information on safeguarding and how to get help for customers and learners is available on the Futures website
- 2.8.10. Assess the risks and issues in the wider community when considering the wellbeing and safety of customers
- 2.8.11. Ensuring staff know what action to take if concerns arise, including cases of potential abuse and neglect.
- 2.8.12. Creating a climate that will enable customers and staff to raise any safeguarding issues they have concerning colleagues/staff including low level concerns.

- 2.8.13. Explaining to our customers how they can make a complaint if they are unhappy with the service provided
- 2.8.14. Sharing information with the appropriate agencies if there is a risk of harm to a customer or to others
- 2.8.15. Ensuring there are trained staff and/or managers (designated people) responsible for dealing with allegations and suspicions.
- 2.8.16. Ensuring that any concerns about staff or other adults within Futures are reported to the Designated Safeguarding Officer for HR and concerns about the DSO for HR should be taken to the Designated Safeguarding Lead. This includes reporting of low-level concerns that do not mean they are insignificant, but they do not meet the threshold for referral to the LADO. – **refer to managing allegation against staff policy for details and procedures.**
- 2.8.17. Where there are concerns about the way that safeguarding is carried out within Futures, staff should refer to the **Whistleblowing Policy**.

### 3. Our Framework for Safeguarding

3.1. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children, young people and adults at risk. Futures' Safeguarding Procedures set out the framework for Futures' approach to safeguarding all.

- 3.1.1. Children's Act 1989 and (2004)
- 3.1.2. Children and Social Work Act 2017
- 3.1.3. Education Act 2002 and (2011)
- 3.1.4. Ofsted: Education Inspection Framework 2022
- 3.1.5. Working Together to Safeguard Children (March 2015) and (2018)
- 3.1.6. Keeping Children Safe in Education (2022)
- 3.1.7. Safeguarding Vulnerable Groups Act (2006)
- 3.1.8. Safeguarding Children and Safer Recruitment in Education
- 3.1.9. Counter Terrorism and Security Act 2015

2.2 The policy should be read in conjunction with related strategies, policies and procedures in the policy section of the intranet

- 3.2.2. Safeguarding strategy
- 3.2.3. Safeguarding procedures
- 3.2.4. Prevent strategy
- 3.2.5. Managing allegations of abuse against staff Policy
- 3.2.6. Futures Online Safety Policy
- 3.2.7. Harassment and Bullying Policy
- 3.2.8. Human Resource Terms and Conditions
- 3.2.9. IT and data security Policy
- 3.2.10. Data Protection Policy
- 3.2.11. Equality and Diversity Policy
- 3.2.12. Equality, Diversity & Inclusion Policy for Customers
- 3.2.13. Health and Safety Policy
- 3.2.14. Complaints Policy and Procedures.
- 3.2.15. Whistleblowing Policy

- 3.2. Futures is committed to the principle of multi-agency working in order to safeguard children, young people and adults at risk.
- 3.3. All senior managers operating at local authority level must work proactively with Local safeguarding partnerships (local authorities, chief officers of police, and clinical commissioning groups), Social Care, and appropriate voluntary agencies to ensure we are fully aware of and involved in local reporting procedures and attend training in safeguarding procedures delivered by the local authorities.

## 4. The role of Futures Safeguarding Officers

### 4.1. Futures Board Safeguarding Representative

In accordance with the protocols for safeguarding there will be a nominated Board member who will lead on safeguarding and receive regular reports and updates on safeguarding issues from the Futures Designated Strategic lead for Safeguarding.

The Futures Board lead on safeguarding is Councillor Boyd Elliott, Gedling Borough Council. [cllr.boyd.elliott@gedling.gov.uk](mailto:cllr.boyd.elliott@gedling.gov.uk)

- 4.2. Futures Board receive appropriate safeguarding training which equips them with the knowledge to provide strategic challenge to test and assure themselves that safeguarding policies and procedures in place at Futures are effective and support delivery of services.

- 4.3. The company has appointed **Safeguarding Officers** who are responsible for leading on safeguarding issues for the company  
Together with the Futures Safeguarding Group they help develop the overall safeguarding strategy and policy development and provide feedback direct to the Futures Board.

### 4.4. Designated Strategic lead for Safeguarding (Director Strategy Growth and Partnerships)

The Strategic Designated Safeguarding Lead is responsible for safeguarding and child protection at Futures. Provides reports to the Board on how Futures discharges its duty with regards to safeguarding, reporting deficiencies in procedure or policy and reporting of concerns and referrals.

Chairs meetings of the Designated Safeguarding Team and Supporting Functions (MI/IT/CPD/HR/Comms)

### 4.5. Designated Safeguarding Officer Lead (strategic DSL deputy)

Key role of the Designated Safeguarding Lead is to manage referrals and keep records of all safeguarding concerns (even where that concern does not lead to a referral)

Take a lead responsibility for raising awareness within the staff of issues relating to the promotion of a safe environment of Futures customers, learners and staff.

Complaints or concerns for staff or others from outside Futures.

Work with external agencies and professionals on matters of safeguarding and the Prevent Duty.

Raise awareness of safeguarding amongst staff and ensure Futures policies and procedures for safeguarding are fit for purpose.

### 4.6. Designated Safeguarding Officers (DSOs)

Overseeing the referral of cases of suspected abuse/radicalisation allegations to the

City/County Councils Department of Children's and Young Peoples Services, adult services or other agencies (such as the police, Channel) as appropriate.

Providing advice and support to other staff on issues relating to child/adults at risk protection.

Liaising with the Children and Young People's Services Department of the Local Authority, the Local Safeguarding Children's Partnership and other appropriate agencies.

Liaising with employers and training organisations on placements to ensure appropriate safeguards are in place.

#### **4.7. DSO for People and Culture Team (staff):**

Ensuring that all staff receive basic training in child protection/adults at risk issues on an ongoing basis and are aware of Futures protection procedures. Ensure specialised training is provided for specific roles as required.

Responsibility for the company procedures on staff recruitment and vetting. Responsibility for investigation of staff allegations and low level concerns and where required reporting to LADO within the local authority.

#### **4.8. Other Staff**

All staff members have a role to play in safeguarding and have a duty to report any concerns to their line manager and/or the nominated manager/designated person as outlined in the Futures procedures.

Staff working in outside locations: schools, Further Education colleges, Job Centre offices and other delivery outlets such as local authority run one stop shops and youth centres, must familiarise themselves with and follow the policies of the institutions to which they are attached and keep their Futures designated safeguarding officer informed of any disclosures.

All staff who report concerns have a duty to reassure customers and learners that their concern is being taken seriously and that they will be supported and kept safe

## **5. Recruitment, Selection and Training Procedures**

5.1. Futures has written recruitment and selection procedures which can be found on the company Intranet. The policy and procedures are designed with the aim of safe recruitment and vetting of staff.

5.2. All new employees are made aware of the policy and procedures during the formal employee induction process. New managers are informed of their role and responsibilities within safeguarding as part of their induction by their line manager.

5.3. Safeguarding and Prevent Duty training are mandatory requirements at induction. Regular safeguarding and prevent updates throughout the year with additional specialist safeguarding training for specific roles as required. Safer recruitment training is a mandatory requirement for managers.

5.4. Updated and amended procedures are disseminated and reinforced in training sessions, team meetings, and via email communications. Futures' safeguarding policy, procedures and guidelines are available to all, being accessible on both the website and intranet.

## 6. Responding to Safeguarding Concerns

- 6.1. All safeguarding concerns, discussion and decisions will be recording in writing on Futures safeguarding concern forms and should be sent encrypted to the [safeguarding@the-futures-group.com](mailto:safeguarding@the-futures-group.com) email box without delay.
- 6.2. If there is an immediate concern the staff member will consult with the Team Manager or DSO before completing the form as reporting urgent concerns takes priority.
- 6.3. All staff will make appropriate safeguarding referrals using the relevant paperwork for their area. The relevant Team Manager will ensure that this is available and ensure there are clear guidelines on its use. Safeguarding forms, and process documentation are listed on the Futures intranet for internal staff and NCS extranet for NCS subcontractors.  
**See annex 2 Safeguarding Process**
- 6.4. All staff will share information in accordance with local protocols, the Children Act 2004, which imposes duties on public bodies to share information when this is necessary to safeguard the welfare of a child, and Working Together to Safeguard Children 2018. Staff can consult their nominated manager/designated person for advice and clarity about sharing information.
- 6.5. [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. [Working Together to Safeguard Children 2018](#) also includes a section on Information Sharing.
- 6.6. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 6.7. All staff will maintain and store records in accordance with Futures Data Protection and Information Security policies and local procedures. Any sensitive data e.g., Safeguarding or Child Protection Case Conference minutes must be securely stored and managed in compliance with information security best practice and GDPR. The line manager and nominated manager/designated person must have access to this information at all times.

## 7. Policy Monitoring and Evaluation

- 7.1. The Futures Safeguarding Group will conduct an annual review of our Safeguarding systems and policies. This will include consideration of specific cases dealt with by staff in the last year. The resulting information, including feedback from staff, will be used by the Designated Lead to inform any improvements necessary. Quarterly Safeguarding reports will be reviewed at Futures Board and Executive Leadership Team level.
- 7.2. Futures Safeguarding Policy and procedures will be clearly communicated to staff, volunteers, subcontractors, Board Members and Service Users through the use of the company, intranet and extranet and our communications department. The Designated Safeguarding Officer: Policy and Procedures named person will be responsible for ensuring this is done.

7.3. The effectiveness of this policy will be monitored and measured in a variety of ways. These will include:

- 7.3.1. Regular reporting on safeguarding incidents to the Executive Leadership Team and Governing Body
- 7.3.2. Measuring staff confidence in managing safeguarding incidents
- 7.3.3. Individual training and development records
- 7.3.4. Development of appropriate mechanism for assessing experience of those reporting safeguarding concerns, or being subject to safeguarding enquiries
- 7.3.5. Feedback from partners on quality and appropriateness of referrals

## 8. Prevent Duty

- 8.1. As part of the Counter Terrorism and Security Act 2015, Futures has a duty to 'prevent people being drawn into terrorism'. This is known as the 'Prevent Duty'.
- 8.2. Where staff are concerned that children, young people and any adult customer or staff are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.
- 8.3. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.
- 8.4. We use the curriculum to ensure that our learners understand how people with extreme views share these with others, especially using the internet.
- 8.5. The Designated Safeguarding Lead links with the Regional Prevent coordinators across the regions.
- 8.6. All staff access Prevent Duty awareness training

## 9. Designated Safeguarding Team Contacts:

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# Annex 1 Safeguarding Guidelines and Definitions

## 1. Definition

### Children and Young People

- 1.1. The Children Act 2004 defines a child as anyone who has not yet reached their 18th Birthday (regardless of whether or not they are living independently). Although the term 'young person' is often used, this is simply a courtesy term as older children tend not to perceive themselves as children, but are still in the age range of the legal definition.

### Abuse

- 1.2. A form of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm or by failing to act to prevent harm. Children or adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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

### Safeguarding

- 1.3. The Children Act 2004 (section 11) places a duty on key people and bodies to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children. Safeguarding and promoting the welfare of children is defined in the guidance document Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2022 as:
  - 1.3.1. Protecting children from maltreatment
  - 1.3.2. Preventing impairment of children's health and development
  - 1.3.3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - 1.3.4. Taking action to enable all children to have the best outcomes.
- 1.4. Futures acknowledges that safeguarding includes a wide range of specific areas including (but not limited to):
  - 1.4.1. Abuse and neglect
  - 1.4.2. Bullying, including cyberbullying
  - 1.4.3. Child abduction and community safety incidents
  - 1.4.4. Child-on-Child abuse
  - 1.4.5. Children with family members in prison
  - 1.4.6. Children Missing from Education (CME)
  - 1.4.7. Child missing from home or care
  - 1.4.8. Child Sexual Exploitation (CSE)
  - 1.4.9. Child Criminal Exploitation (CCE)
  - 1.4.10. Children and the Court System
  - 1.4.11. Children with family members in prison
  - 1.4.12. Contextual safeguarding (risks outside the family home)
  - 1.4.13. County lines and gangs
  - 1.4.14. Cybercrime
  - 1.4.15. Domestic abuse
  - 1.4.16. Drugs and alcohol misuse
  - 1.4.17. Fabricated or induced illness

- 1.4.18. Faith abuse
- 1.4.19. FGM
- 1.4.20. Gender based abuse and violence against women and girls
- 1.4.21. Hate
- 1.4.22. Homelessness
- 1.4.23. Human trafficking and modern slavery
- 1.4.24. Mental health
- 1.4.25. Modern Slavery and the National Referral mechanism
- 1.4.26. Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- 1.4.27. Online safety
- 1.4.28. Preventing radicalisation and extremism
- 1.4.29. The Prevent Duty
- 1.4.30. Channel
- 1.4.31. Private fostering
- 1.4.32. Relationship abuse
- 1.4.33. Serious violence
- 1.4.34. Sexual violence and sexual harassment between children in schools and colleges
- 1.4.35. So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
- 1.4.36. Upskirting

Additional guidance on the above topic is contained within [Keeping Children Safe in Education 2022](#)

- 1.5. Local Safeguarding Children Partnerships in each Local Authority are responsible for developing local policies and procedures, including those relating to the action to be taken where there are concerns about a child’s safety and welfare. These procedures will be applied if a child protection referral is made to Children’s Services.
  
- 1.6. The Local Authority has a duty to make enquiries where it has reasonable cause to suspect that a child is suffering or is at risk of suffering significant harm which may be as a result of abuse and /or neglect. The Government guidance document Working Together to Safeguard Children 2018 defines four categories of child abuse:
  - 1.6.1. **Physical abuse** – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. They may be abused by an adult, adults or another child or children. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
  
  - 1.6.2. **Emotional/Psychological abuse** - the persistent emotional maltreatment of a child or adult at risk such as to cause severe and persistent adverse effects on their emotional health or development. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a 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), causing children frequently to feel

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, although it may occur alone

- 1.6.3. **Sexual abuse** - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of their policy and procedures for dealing with it.
- 1.6.4. **Neglect and Acts of Omission** - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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 and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 1.7. Detailed definitions of each of these categories and information on the signs and symptoms of abuse can be found in Keeping Children Safe in Education 2022. Staff should familiarise themselves with these, to ensure they are alert to the signs of possible child abuse.
- 1.8. Significant harm is the threshold that justifies compulsory intervention in family life in the best interests of the child. Decisions about significant harm are complex and will be informed by a careful assessment of the child's circumstances.
- 1.9. Recognising abuse is not always easy and it is not the responsibility of Futures staff to investigate and decide whether or not abuse has taken place, or if a child is at risk of significant harm. Staff should however always report any concerns they may have, following the procedure outlined in this document.
- 1.10. **Always report any genuine concerns that you have. Do not let your fear of drawing a wrong conclusion deter you from doing so.**
- 1.11. Where staff have a concern about a child which is not a child protection issue i.e., where there is no suspicion of abuse or neglect, but it is felt that the child may be in need of additional support, a referral should be made to the Local Authority.

## 2. Children, young people and adults with additional needs

### 2.1. Children, young people and adults with special educational needs and disabilities can face additional safeguarding challenges because:

- 2.1.1. there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- 2.1.2. they may be more prone to peer group isolation or bullying (including prejudice-based bullying)
- 2.1.3. children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- 2.1.4. difficulties may arise in overcoming communication barriers and difficulties in managing or reporting these challenges.
- 2.1.5. Organisations must take positive action, where proportionate, to deal with the disadvantages these pupils face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.
- 2.1.6. The guidance in the Equality Act 2010 looks at the implications of the Public Sector Equality Duty (PSED) for education settings. This includes a need to be conscious that pupils with protected characteristics may be more at risk of harm and integrate this into safeguarding policies and procedures. At Futures we identify customers who might need more pastoral support to be kept safe or to keep themselves safe by assessing our customer and learners needs whilst using our services.
- 2.1.7. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the appropriate person supporting SEND young people.
- 2.1.8. Futures will consider extra pastoral support for these children alongside the designated school or college to ensure appropriate support for communication is in place.

### 2.2. Children who are lesbian, gay, bi or trans (LGBT)

- 2.2.1. The fact that a young person may be LGBT is not itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- 2.2.2. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

### 2.3. Staff should be aware that safeguarding issues can manifest themselves via child-on child abuse. This is most likely to include, but not limited to:

- 2.3.1. bullying (including cyberbullying);
- 2.3.2. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

- 2.3.3. sexual violence and sexual harassment;
  - 2.3.4. gender-based violence
  - 2.3.5. sexting (also known as youth produced sexual imagery); and
  - 2.3.6. Initiation-type violence and rituals.
- 2.4. Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include females being sexually touched/assaulted or males being subject to initiation-type violence.
- 2.5. All staff should be aware that children 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. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- 2.6. All staff at Futures are aware that mental health problems can, in some cases, be an indicator that a customer or learner has suffered or is at risk of suffering abuse, neglect or exploitation
- 2.7. If staff have a mental health concern about a customer or learner that is also a safeguarding concern, immediate action should be taken by speaking to the Team Manager or Designated Safeguarding Officer.

### **3. Definition of Adults at risk**

#### **Background**

- 3.1. The legal basis for responding to concerns regarding the safety and welfare of adults at risk is different to that for children. Working Together to Safeguard Children 2018 only applies to children and young people who have not yet reached age 18. Any incident or concerns relating to a young person or adult above the age of 18, even if they are still at school or college, are covered by Multi-Agency Safeguarding Hub (MASH). They are required to develop policies for responding to allegations and carrying out investigations.
- 3.2. Although the legal basis is different, the principles for staff in identifying and responding to incidents of concern in relation to adults at risk are largely the same as those for children and young people under 18.

#### **3.3. Adults at risk of harm**

The Care Act 2014 defines an adult at risk as someone who is aged 18 or above and:

- 3.3.1. Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- 3.3.2. Is experiencing, or is at risk of, abuse or neglect; and;

- 3.3.3. As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect
- 3.4. Adults considered to be at risk in the above definition therefore may include those who have:
  - 3.4.1. A learning / physical / sensory disability (including speech and language disability and communication disorders e.g., autistic spectrum difficulties)
  - 3.4.2. Mental ill health or dementia
  - 3.4.3. Frailty due to age
  - 3.4.4. Acquired brain injury
  - 3.4.5. A drug / alcohol problem
  - 3.4.6. Certain types of physical illness.
- 3.5. As such, many staff in Futures will come into contact with adults at risk during the course of their work. It should be noted however that a person is not classed as 'at risk' simply because they are elderly or have a disability and that being at risk may not necessarily be a permanent state.
- 3.6. The term 'Adult at Risk' is now more commonly used in place of 'Vulnerable Adult', as 'Vulnerable Adult' may wrongly imply that some of the fault for the abuse lies with the victim.

#### **Abuse in the context of Adults at risk**

- 3.7. There is clearly significant overlap between what constitutes abuse of children and in the context of adults at risk, however as this is dealt with under separate legislation, separate guidance applies.
- 3.8. Current Department of Health guidance defines abuse as:

'a violation of an individual's human and civil rights by other person or persons.... Abuse may consist of single or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or omission to act, or it may occur when an adult at risk is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm, or exploitation of, the person subjected to it. Abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.
- 3.9. 'Significant harm' should be taken to include:

'ill treatment including sexual abuse and forms of ill treatment which are not physical; the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development.'
- 3.10. The main forms of abuse are:

- 3.10.1. **Physical abuse** - includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
  - 3.10.2. **Sexual abuse** - includes rape and sexual assault or sexual acts to which the adult at risk has not consented, or could not consent or was pressured into consenting
  - 3.10.3. **Psychological abuse** - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks
  - 3.10.4. **Financial or material abuse** - includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
  - 3.10.5. **Neglect and acts of omission** - includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
  - 3.10.6. **Discriminatory abuse** – based on race, sex and disability, and other forms of harassment, slurs or similar treatment.
- 3.11. There are obvious similarities here with the types of abuse defined earlier in relation to children and young people, with the notable additions being the financial or material abuse and discriminatory abuse categories. It should be noted that forced marriage also falls within the definition of abuse.

#### **4. Definitions and signs of child abuse**

##### *What is child abuse?*

- 4.1. Child abuse happens when a person – adult or child – harms a child. It can be physical, sexual or emotional, but can also involve a lack of love, care and attention. Neglect can be just as damaging to a child as physical or sexual abuse. Children may be abused by:
  - 4.1.1. family members
  - 4.1.2. friends
  - 4.1.3. people working or volunteering in organisational or community settings
  - 4.1.4. people they know
  - 4.1.5. or, much less commonly, by strangers.
- 4.2. Children suffering abuse often experience more than one type of abuse. The abuse usually happens over a period time, rather than being a single, isolated incident. Increasingly, abuse can happen online.

##### **General signs of abuse**

- 4.3. Children who suffer abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend. Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or

young people needs to be vigilant to the signs listed below.

- 4.3.1. regular flinching in response to sudden but harmless actions, for example someone raising a hand quickly
- 4.3.2. showing an inexplicable fear of particular places or making excuses to avoid particular people
- 4.3.3. knowledge of 'adult issues' for example alcohol, drugs and/or sexual behaviour which is inappropriate for their age or stage of development
- 4.3.4. angry outbursts or behaving aggressively towards other children, adults, animals or toys
- 4.3.5. becoming withdrawn or appearing anxious, clingy or depressed
- 4.3.6. self-harming or thoughts about suicide
- 4.3.7. changes in eating habits or developing eating disorders
- 4.3.8. regularly experiencing nightmares or sleep problems
- 4.3.9. regularly wetting the bed or soiling their clothes
- 4.3.10. in older children, risky behaviour such as substance misuse or criminal activity
- 4.3.11. running away or regularly going missing from home or care
- 4.4. not receiving adequate medical attention after injuries.

These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents/carers. In assessing whether signs are related to abuse or not, they need to be considered in the context of the child's development and situation.

## **Physical abuse**

### *What is physical abuse?*

- 4.5. Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises, burns and broken bones. It can involve hitting, kicking, shaking, throwing, poisoning, burning or suffocating. It's also physical abuse if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medicine they don't need, making them unwell. This is known as fabricated or induced illness (FII).

### *Spotting the signs of physical abuse*

- 4.6. All children have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern. Injuries that are more likely to indicate physical abuse include:
  - 4.7. Bruising
    - 4.7.1. bruises on babies who are not yet crawling or walking
    - 4.7.2. bruises on the cheeks, ears, palms, arms and feet

- 4.7.3. bruises on the back, buttocks, tummy, hips and backs of legs
  - 4.7.4. multiple bruises in clusters, usually on the upper arms or outer thighs
  - 4.7.5. bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
  - 4.7.6. large oval-shaped bite marks.
- 4.8. Burns or scalds
- 4.8.1. any burns which have a clear shape of an object, for example cigarette burns
  - 4.8.2. burns to the backs of hands, feet, legs, genitals or buttocks
- 4.9. Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times. If a child is frequently injured, and if the bruises or injuries are unexplained or the explanation doesn't match the injury, this should be investigated. It's also concerning if there is a delay in seeking medical help for a child who has been injured.

## **Neglect**

### *What is neglect?*

- 4.10. Neglect is persistently failing to meet a child's basic physical and/or psychological needs usually resulting in serious damage to their health and development. Neglect may involve a parent's or carer's failure to:
- 4.10.1. provide adequate food, clothing or shelter
  - 4.10.2. supervise a child (including leaving them with unsuitable carers) or keep them safe from harm or danger
  - 4.10.3. make sure the child receives appropriate health and/or dental care
  - 4.10.4. make sure the child receives a suitable education
  - 4.10.5. meet the child's basic emotional needs – parents may ignore their children when they are distressed or even when they are happy or excited. This is known as emotional neglect.
- 4.11. Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse.

### *Spotting the signs of neglect*

- 4.12. Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem. Some of these signs include:
- 4.12.1. children who appear hungry - they may come to school without lunch money or even try to steal food
  - 4.12.2. children who appear dirty or smelly and whose clothes are unwashed or inadequate for the weather conditions

- 4.12.3. children who are left alone or unsupervised
- 4.12.4. children who fail to thrive or who have untreated injuries, health or dental problems
- 4.12.5. children with poor language, communication or social skills for their stage of development
- 4.12.6. children who live in an unsuitable home environment, for example the house is very dirty and unsafe, perhaps with evidence of substance misuse or violence
- 4.12.7. children who have taken on the role of carer for other family members.

## **Sexual abuse**

### *What is sexual abuse?*

- 4.13. Sexual abuse is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and/or non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child. It includes:
  - 4.13.1. sexual touching of any part of the body whether the child is wearing clothes or not
  - 4.13.2. rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
  - 4.13.3. forcing or encouraging a child to take part in sexual activity
  - 4.13.4. making a child take their clothes off, touch someone else's genitals or masturbate.
- 4.14. Non-contact abuse involves non-touching activities. It can happen online or in person and includes:
  - 4.14.1. encouraging a child to watch or hear sexual acts
  - 4.14.2. not taking proper measures to prevent a child being exposed to sexual activities by others
  - 4.14.3. showing pornography to a child
  - 4.14.4. making, viewing or distributing child abuse images
  - 4.14.5. allowing someone else to make, view or distribute child abuse images.
- 4.15. Online sexual abuse includes:
  - 4.15.1. persuading or forcing a child to send or post sexually explicit images of themselves, this is sometimes referred to as sexting
  - 4.15.2. persuading or forcing a child to take part in sexual activities via a webcam or smartphone
  - 4.15.3. having sexual conversations with a child by text or online
  - 4.15.4. meeting a child following online sexual grooming with the intent of abusing them.

- 4.16. Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped. Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming.

#### *Spotting the signs of sexual abuse*

- 4.17. There may be physical signs that a child has suffered sexual abuse. These include:

- 4.17.1. anal or vaginal soreness or itching
- 4.17.2. bruising or bleeding near the genital area
- 4.17.3. discomfort when walking or sitting down
- 4.17.4. an unusual discharge
- 4.17.5. sexually transmitted infections (STI)
- 4.17.6. pregnancy.

- 4.18. Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people. In particular, the child may show sexual behaviour that is inappropriate for their age. For example:

- 4.18.1. they could use sexual language or know things about sex that you wouldn't expect them to
- 4.18.2. a child might become sexually active at a young age
- 4.18.3. they might be promiscuous.

#### **Emotional abuse**

##### *What is emotional abuse?*

- 4.19. Emotional abuse is persistent and, over time, it severely damages a child's emotional health and development. It involves:

- 4.19.1. humiliating, putting down or constantly criticising a child
- 4.19.2. shouting at or threatening a child or calling them names
- 4.19.3. mocking a child or making them perform degrading acts
- 4.19.4. constantly blaming or scapegoating a child for things which are not their fault
- 4.19.5. trying to control a child's life and not recognising their individuality
- 4.19.6. not allowing them to have friends or develop socially
- 4.19.7. pushing a child too hard or not recognising their limitations
- 4.19.8. manipulating a child
- 4.19.9. exposing a child to distressing events or interactions such as drug taking, heavy drinking or domestic abuse
- 4.19.10. persistently ignoring them

- 4.19.11. being cold and emotionally unavailable during interactions with a child
- 4.19.12. never saying anything kind, positive or encouraging to a child and failing to praise their achievements and successes.

#### *Spotting the signs of emotional abuse*

4.20. There aren't usually any obvious physical signs of emotional abuse but you may spot signs in a child's actions or emotions. It's important to remember that some children are naturally quiet and self-contained whilst others are more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development. Babies and pre-school children who are being emotionally abused may:

- 4.20.1. be overly-affectionate towards strangers or people they haven't known for very long
- 4.20.2. not appear to have a close relationship with their parent, for example when being taken to or collected from nursery
- 4.20.3. lack confidence or become wary or anxious
- 4.20.4. be unable to play
- 4.20.5. be aggressive or nasty towards other children and animals.

4.21. Older children may:

- 4.21.1. use language, act in a way or know about things that you wouldn't expect for their age
- 4.21.2. struggle to control strong emotions or have extreme outbursts
- 4.21.3. seem isolated from their parents
- 4.21.4. lack social skills or have few, if any, friends
- 4.21.5. fear making mistakes • fear their parent being approached regarding their behaviour
- 4.21.6. self-harm.

### **Domestic abuse**

#### *Definition*

4.22. The Domestic Abuse Act 2021 (part 1) introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right. The act defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident between two people over the age of 16 who are 'personally connected' to each other:

- 4.22.1. Physical or sexual abuse;
- 4.22.2. Violent or threatening behaviour;
- 4.22.3. Controlling or coercive behaviour;

4.22.4. Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property, or obtain goods or services; and

4.22.5. Psychological, emotional or other abuse.

4.23. People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, or have shared parental responsibility for the same child or they are relatives.

4.24. The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of the abuse and they are related to the abusive person or experience it through their own intimate relationships.

4.25. 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.

4.26. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child 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.

4.27. The National Domestic Abuse helpline can be called free of charge and in confidence 24 hours a day on 0808 2000 247

#### *Spotting the signs of domestic abuse*

4.28. It can be difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may:

4.28.1. become aggressive

4.28.2. display anti-social behaviour

4.28.3. suffer from depression or anxiety

4.28.4. not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

## **Bullying and cyberbullying**

### *What are bullying and cyberbullying?*

4.29. Bullying is behaviour that hurts someone else. It usually happens over a lengthy period of time and can harm a child both physically and emotionally. Bullying includes:

- 4.29.1. verbal abuse, such as name calling
  - 4.29.2. non-verbal abuse, such as hand signs or glaring
  - 4.29.3. emotional abuse, such as threatening, intimidating or humiliating someone
  - 4.29.4. exclusion, such as ignoring or isolating someone
  - 4.29.5. undermining, by constant criticism or spreading rumours
  - 4.29.6. controlling or manipulating someone
  - 4.29.7. racial, sexual or homophobic bullying
  - 4.29.8. physical assaults, such as hitting and pushing
  - 4.29.9. making silent, hoax or abusive calls.
- 4.30. Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying.

*Cyberbullying includes:*

- 4.30.1. sending threatening or abusive text messages
- 4.30.2. creating and sharing embarrassing images or videos
- 4.30.3. 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- 4.30.4. excluding children from online games, activities or friendship groups
- 4.30.5. setting up hate sites or groups about a particular child
- 4.30.6. encouraging young people to self-harm
- 4.30.7. voting for or against someone in an abusive poll
- 4.30.8. creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.

*Spotting the signs of bullying and cyberbullying*

- 4.31. It can be hard to know whether or not a child is being bullied. They might not tell anyone because they're scared the bullying will get worse. They might also think that the bullying is their fault. No one sign indicates for certain that a child's being bullied, but you should look out for:
- 4.31.1. belongings getting 'lost' or damaged
  - 4.31.2. physical injuries such as unexplained bruises
  - 4.31.3. being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
  - 4.31.4. not doing as well at school
  - 4.31.5. asking for, or stealing, money (to give to a bully)
  - 4.31.6. being nervous, losing confidence or becoming distressed and withdrawn
  - 4.31.7. problems with eating or sleeping

4.31.8. bullying others.

### **Child-on-Child Abuse (previously known as Peer-on-Peer)**

- 4.32. Futures has a zero-tolerance approach to abuse, and this will never be passed off for example as “banter” as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners and staff.
- 4.33. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school, college, or training provider premises and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- 4.34. There is a recognition that it is more likely that females will be victims and males perpetrators, but that child-on-child abuse is unacceptable and will be taken seriously.
- 4.35. All staff should understand, that even if there are no reports within Futures premises it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding officer (or manager). **See Annex 3 Sexual Violence and Sexual Harassment Flow Chart**
- 4.36. It is essential that all staff understand the importance of challenging inappropriate behaviours between children and young people, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 4.37. Child-on-child abuse is most likely to include, but may not be limited to:
- 4.37.1. bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - 4.37.2. abuse in intimate personal relationships between children;
  - 4.37.3. 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);
  - 4.37.4. 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);
  - 4.37.5. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
  - 4.37.6. 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;
  - 4.37.7. consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);

- 4.37.8. 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
- 4.37.9. 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).

## **Child on Child Sexual Violence or Harassment**

- 4.38. When responding to concerns relating to child-on-child sexual violence or harassment, Futures will follow the guidance outlined in Part Five of KCSIE 2022 and the DfE 2021 [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#) guidance. **See Annex 3 Sexual Violence and Sexual Harassment Flow Chart**
- 4.39. Futures recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment are never acceptable.
- 4.40. Human Rights Legislation updated guidance makes it clear that being subjected to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights Act
- 4.41. All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- 4.42. When there has been a report of sexual violence or harassment, the DSO will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
- 4.42.1. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.
- 4.43. Reports will initially be managed internally by Futures and where necessary will be referred to Integrated Children's Services and/or the Police.
- 4.43.1. The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or staff, and, any other related issues or wider context.
- 4.44. Futures recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

- 4.45. When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
- 4.45.1. Report any concerns to the DSO immediately.
  - 4.45.2. Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSO.
  - 4.45.3. Not delete the imagery or ask the child to delete it.
  - 4.45.4. Not say or do anything to blame or shame any children involved.
  - 4.45.5. Explain to child(ren) involved that they will report the issue to the DSO and reassure them that they will receive appropriate support and help.
  - 4.45.6. Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSO.
- 4.46. The DSO will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
- 4.47. Parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- 4.48. All decisions and action taken will be recorded in line with our child protection procedures.
- 4.49. a referral will be made to ICS and/or the police immediately if:
- 4.49.1. The incident involves an adult (over 18).
  - 4.49.2. There is reason to believe that a child has been coerced, extorted, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
  - 4.49.3. The image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
  - 4.49.4. A child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- 4.50. The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- 4.51. In cases where nudes or semi-nudes have been shared, Futures follows the guidance given by the UK Council for Internet Safety (UKCIS): [Sharing nudes and semi-nudes December 2020](#)

## **Child trafficking**

### *What is child trafficking?*

- 4.52. Child trafficking is child abuse. It involves recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another. Children are trafficked for:

- 4.52.1. child sexual exploitation
  - 4.52.2. benefit fraud
  - 4.52.3. forced marriage
  - 4.52.4. domestic servitude such as cleaning, childcare, cooking
  - 4.52.5. forced labour in factories or agriculture
  - 4.52.6. criminal exploitation such as cannabis cultivation, pickpocketing, begging, transporting, drugs, selling pirated DVDs and bag theft.
- 4.53. Children who are trafficked experience many forms of abuse and neglect. Physical, sexual and emotional abuse is often used to control them and they're also likely to suffer physical and emotional neglect.
- 4.54. Child trafficking can require a network of organised criminals who recruit, transport and exploit children and young people. Some people in the network might not be directly involved in trafficking a child but play a part in other ways, such as falsifying documents, bribery, owning or renting premises or money laundering (Europol, 2011).
- 4.55. Child trafficking can also be organised by individuals and the children's own families. Traffickers trick, force or persuade children to leave their homes. They use grooming techniques to gain the trust of a child, family or community. Although these are methods used by traffickers, coercion, violence or threats don't need to be proven in cases of child trafficking - a child cannot legally consent to their exploitation so child trafficking only requires evidence of movement and exploitation.
- 4.56. Modern slavery is another term which may be used in relation to child trafficking. Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking (HM Government, 2014). The Modern Slavery Act passed in 2015 in England and Wales categorises offences of slavery, servitude, forced or compulsory labour and human trafficking (NCA, 2017).

#### *Spotting the signs of child trafficking*

- 4.57. Signs that a child has been trafficked may not be obvious but you might notice unusual behaviour or events. These include a child who:
- 4.57.1. spends a lot of time doing household chores
  - 4.57.2. rarely leaves their house, has no freedom of movement and no time for playing
  - 4.57.3. is orphaned or living apart from their family, often in unregulated private foster care
  - 4.57.4. lives in substandard accommodation
  - 4.57.5. isn't sure which country, city or town they're in
  - 4.57.6. is unable or reluctant to give details of accommodation or personal details
  - 4.57.7. might not be registered with a school or a GP practice
  - 4.57.8. has no documents or has falsified documents

- 4.57.9. has no access to their parents or guardians
- 4.57.10. is seen in inappropriate places such as brothels or factories
- 4.57.11. possesses unaccounted for money or goods
- 4.57.12. is permanently deprived of a large part of their earnings
- 4.57.13. required to earn a minimum amount of money every day or pay off an exorbitant debt
- 4.57.14. has injuries from workplace accidents
- 4.57.15. gives a prepared story which is very similar to stories given by other children.

4.58. There are also signs that an adult is involved in child trafficking, such as:

- 4.58.1. making multiple visa applications for different children
- 4.58.2. acting as a guarantor for multiple visa applications for children
- 4.58.3. travelling with different children who they're not related to or responsible for
- 4.58.4. insisting on remaining with and speaking for the child
- 4.58.5. living with unrelated or newly arrived children
- 4.58.6. abandoning a child or claiming not to know a child they were previously with.

## **Child sexual exploitation**

4.59. The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child sexual exploitation: Definition and a guide for practitioners (DfE 2021)* and *KCSIE 2022*

The definition is:

4.60. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

4.61. Indicators of child sexual exploitation may include:

- 4.61.1. Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- 4.61.2. Gang-association and/or isolation from peers/social networks;
- 4.61.3. Exclusion or unexplained absences from school, college or work;
- 4.61.4. Leaving home/care without explanation and persistently going missing or returning late;

- 4.61.5. Excessive receipt of texts/phone calls;
- 4.61.6. Returning home under the influence of drugs/alcohol;
- 4.61.7. Inappropriate sexualised behaviour for age/sexually transmitted infections;
- 4.61.8. Evidence of/suspicions of physical or sexual assault;
- 4.61.9. Relationships with controlling or significantly older individuals or groups;
- 4.61.10. Multiple callers (unknown adults or peers);
- 4.61.11. Frequenting areas known for sex work;
- 4.61.12. Concerning use of internet or other social media;
- 4.61.13. Increasing secretiveness around behaviours; and
- 4.61.14. Self-harm or significant changes in emotional well-being.

*Potential vulnerabilities include:*

- 4.62. Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.
  - 4.62.1. Having a prior experience of neglect, physical and/or sexual abuse;
  - 4.62.2. Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
  - 4.62.3. Recent bereavement or loss;
  - 4.62.4. Social isolation or social difficulties;
  - 4.62.5. Absence of a safe environment to explore sexuality;
  - 4.62.6. Economic vulnerability;
  - 4.62.7. Homelessness or insecure accommodation status;
  - 4.62.8. Connections with other children and young people who are being sexually exploited;
  - 4.62.9. Family members or other connections involved in adult sex work;
  - 4.62.10. Having a physical or learning disability;
  - 4.62.11. Being in care (particularly those in residential care and those with interrupted care histories); and
  - 4.62.12. Sexual identity.

**Serious Violence and Criminal exploitation of children, including ‘county lines’.**

- 4.63. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, 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

that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

- 4.64. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. [Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

#### *What is child criminal exploitation?*

- 4.65. Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

“Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.”

Information about Child Criminal Exploitation can be found in KCSIE (2022)

- 4.66. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.
- 4.67. Some of the following can be indicators of Child Criminal Exploitation:
- 4.67.1. Children who appear with unexplained gifts or new possessions
  - 4.67.2. Children who associate with other young people involved in exploitation
  - 4.67.3. Children who suffer from changes in emotional well-being
  - 4.67.4. Children who misuse drugs or alcohol
  - 4.67.5. Children who go missing for periods of time or regularly come home late; and
  - 4.67.6. Children who go missing in education

#### *What is county lines exploitation?*

- 4.68. County lines is a major, cross-cutting issue involving:
- 4.68.1. Drugs
  - 4.68.2. Violence
  - 4.68.3. Gangs
  - 4.68.4. Safeguarding
  - 4.68.5. criminal and sexual exploitation
  - 4.68.6. modern slavery
  - 4.68.7. missing persons

4.69. And the response to tackle it involves:

4.69.1. the police

4.69.2. the National Crime Agency

4.69.3. a wide range of government departments

4.69.4. local government agencies

4.69.5. VCS (voluntary and community sector) organisations

*The UK government defines county lines as:*

4.70. “County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children, young people and adult at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.”

4.71. Exploitation is an integral part of county lines offending model with children and adults at risk exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

4.72. Children and adults at risk can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

4.73. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, adult at risk and local communities.

## **Cybercrime**

4.74. Futures recognises that young people and adults with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

4.75. If staff are concerned that a customer or learner may be at risk of becoming involved in cyber-dependent cybercrime, the DSO will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

4.76. Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

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

- 4.77. Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.
- 4.78. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

### *Risk factors for FGM include:*

- 4.78.1. low level of integration into UK society
- 4.78.2. mother or a sister who has undergone FGM
- 4.78.3. girls who are withdrawn from Personal, Social and Health Education (PSHE)
- 4.78.4. visiting female elder from the country of origin
- 4.78.5. being taken on a long holiday to the country of origin
- 4.78.6. talk about a 'special' procedure to become a woman

### *Symptoms of FGM*

- 4.79. FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.
- 4.80. Indications that FGM may have already taken place may include:
  - 4.80.1. difficulty walking, sitting or standing and may even look uncomfortable
  - 4.80.2. spending longer than normal in the bathroom or toilet due to difficulties urinating.
  - 4.80.3. spending long periods of time away from a classroom during the day with bladder or menstrual problems.
  - 4.80.4. frequent urinary, menstrual or stomach problems.
  - 4.80.5. prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
  - 4.80.6. reluctance to undergo normal medical examinations.
  - 4.80.7. confiding in a professional without being explicit about the problem due to embarrassment or fear.
  - 4.80.8. talking about pain or discomfort between her legs
- 4.81. The Serious Crime Act 2015 sets out a duty on professionals to notify police when they discover that FGM appears to have been carried out on a girl under 18. This this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

- 4.82. Staff must report where they discover that an act of FGM appears to have been carried out to the Designated Safeguarding Officer, so that this can be reported to the police and social care.
- 4.83. So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.
- 4.84. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

### **Children Missing Education (CME)**

- 4.85. Knowing where children/ young people/ adults at risk are during school/college or working hours is an extremely important aspect of Safeguarding. Missing school/college or working can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community.
- 4.86. Futures will monitor attendance carefully and address poor or irregular attendance without delay.
- 4.87. We will always follow up when our learners or staff do not attend training or work.
- 4.88. General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).
- 4.89. In response to the Guidance in KCSIE 2022 Futures has:
  - 4.89.1. Staff who understand what to do when learners do not attend regularly
  - 4.89.2. Appropriate procedures for learners who go missing in education
  - 4.89.3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

### **5. Prevent Duty**

- 5.1. As part of the Counter Terrorism and Security Act 2015, Futures has a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.
- 5.2. Where staff are concerned that children, young people and any adult customer or staff are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

- 5.3. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.
- 5.4. We use the curriculum to ensure that our learners understand how people with extreme views share these with others, especially using the internet.
- 5.5. Staff should be alert to changes in children's and adults' behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead making a referral.
- 5.6. Futures are committed to ensuring that our learners are offered a balanced curriculum that aims to prepare them for life in modern Britain including fundamental British values.

### *Recognising Extremism*

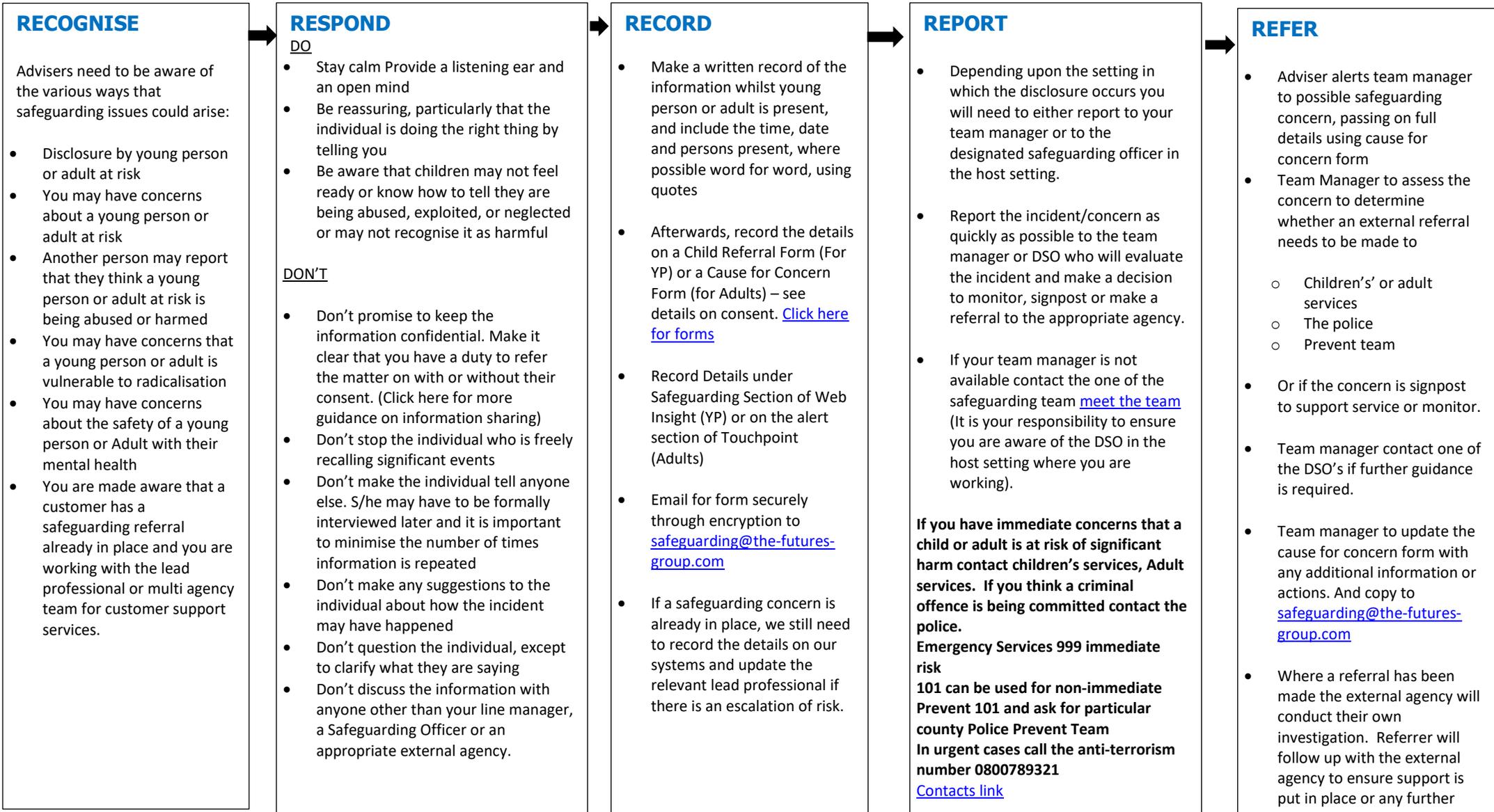
- 5.7. Early indicators of radicalisation or extremism may include:
  - 5.7.1. showing sympathy for extremist causes
  - 5.7.2. glorifying violence, especially to other faiths or cultures
  - 5.7.3. making remarks or comments about being at extremist events or rallies
  - 5.7.4. evidence of possessing illegal or extremist literature
  - 5.7.5. advocating messages similar to illegal organisations or other extremist groups
  - 5.7.6. out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
  - 5.7.7. secretive behaviour
  - 5.7.8. online searches or sharing extremist messages or social profiles
  - 5.7.9. intolerance of difference, including faith, culture, gender, race or sexuality
  - 5.7.10. graffiti, art work or writing that displays extremist themes
  - 5.7.11. attempts to impose extremist views or practices on others
  - 5.7.12. verbalising anti-Western or anti-British views
  - 5.7.13. advocating violence towards others

## **6. Online Safety**

- 6.1. It is essential that customers and learners are safeguarded from potentially harmful and inappropriate material or behaviours online. Futures will adopt a whole organisational approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- 6.2. Futures identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- 6.2.1. Content: being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - 6.2.2. 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.
  - 6.2.3. Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g., consensual and non-consensual)
- 6.3. Futures has a separate Online Safety Policy which reflects the above, the policy is on the company website alongside our safeguarding policy and other relevant policies.

## Annex 2 Safeguarding Process



# Annex 3 Sexual Violence and Sexual Harassment Flow Chart

Report received from victim or Third Party, Onsite, Offsite or online

**Definitions**  
**Sexual Violence**  
 Rape  
 Assault by penetration  
 Sexual assault

**Sexual Harassment**  
 Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behaviour or online sexual harassment

**Victim reassured**

- taken seriously and kept safe; and never be given an impression they are creating a problem
- confidentiality not promised
- listen to victim, non-judgementally
- record the disclosure (facts as reported)
- two staff present (one being the team manager, or reported to DSL as soon as possible)
- victim sensitively informed about referral to other agencies
- if victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see 'Sexual Violence and Sexual Harassment' KCSIE 2022)
- parents of victim informed, unless this would put victim at greater risk.
- Anonymity - Note that in cases of sexual violence there is legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in the organisation

**Record Keeping**

Record all concerns, discussions, decisions and reasons for decisions

**CONSIDERATIONS**  
 (Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours) Immediately: Consider how to support the victim and the alleged perpetrator

- Wishes of victim
- Nature of the alleged incident
- Ages of the children
- Developmental stage of the child
- any power imbalance
- one-off, or part of pattern behaviour
- any ongoing risks to victim or others
- other related issues and wider context (e.g. CSE)

**Manage Internally**  
 One-off incidents which the organisation believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the organisation's behaviour policy or anti-bullying policy.

**EARLY HELP**  
 Non-violent Harmful Sexual Behaviours (see Harmful Sexual Behaviours Framework (NSPCC))

**REFER TO SOCIAL CARE**  
 All incidents where a child has been harmed, is at risk of harm or is in immediate danger. Social Care staff will decide next steps. Be ready to escalate if necessary.

**REFER TO POLICE**  
 All incidents of rape, assault by penetration or sexual assault. (incl. if perpetrator is 10 or under) Discuss next steps with police, for example, disclosing information to other staff, informing alleged perpetrator and their parents.

**Risk Assessment** – case by case basis refer to Sexual Violence and Sexual Harassment between children in schools and colleges (KCSIE 2022)

**RISK ASSESSMENT**  
**Immediately**  
 Do not wait for outcome of referral before protecting victim. Emphasis on victim being able to continue normal routines. Alleged perpetrator removed from any classes with victim (also consider shared spaces and journey to/from organisation) [Not a judgement of guilt]

**Safeguard and Support Victim and (Alleged) Perpetrator**

**Disciplinary Measures Taken (see behaviour, Harassment and Bullying policy)**

**Disciplinary Measures Taken**  
 (May be undertaken based on balance of probabilities, unless prejudicial or unreasonable) Ensure actions do not jeopardise the investigation Organisation to work closely with police and/or other agencies

**CRIMINAL PROCESS ENDS**

- Conviction or Caution: follow behaviour policy, consider Permanent Exclusion. If pupil remains in organisation, make clear expectations; keep victim and perpetrator apart. Consider victim's wishes.
- Not Guilty: Support victim and alleged perpetrator

Source: Sexual Violence and Sexual Harassment between children in Schools and Colleges KCSIE 2022