THE Inspire & Achieve FOUNDATION

# SAFEGUARDING POLICY

2026-2027



# Safeguarding Policy and Procedure 2026/27

***"Saying nothing is not an option"***

***"Don't assume someone else has raised the concern or reported it"***

***"It can happen here"***



Created: August 2023
Reviewed: August 2026
Next review: August 2027
Owner: Jaye Crew

**Safeguarding procedure contents**


| | Page Number |
|---|---|
| Key personnel | **4** |
| Introduction | **5** |
| Safeguarding – what all staff need to know | **6** |
| How to report a concern | **14** |
| Responding to a concern – the role of the safeguarding team | **17** |
| Storage and transfer of files | **18** |
| Raising concerns about members of staff | **19** |
| Raising concerns about safeguarding practice | **20** |
| Staff training | **20** |
| FGM mandatory reporting duty | **21** |
| **Appendix 1** Procedure for dealing with allegations of child on child sexual violence and sexual harassment (Including online) | **23** |
| **Appendix 2** young person bullying and harassment statement of intent | **31** |
| **Appendix 3** Online Safety Policy | **35** |
| **Appendix 4** Responding to concerns about staff | **38** |
| **Appendix 5** Helpful information | **42** |
| **Appendix 6** Definitions | **43** |
| **Appendix 7** Further information taken from KCSiE | **45** |
| **Appendix 8** Safeguarding Policy Statement | **56** |


The procedure has referenced and reflects the following external guidance documents:

- Department for Education *Keeping Children Safe in Education; Statutory Guidance for Schools* and *Colleges (September 2026)*
- DfE draft guidance - *Gender questioning children (2023)*
- *Meeting digital and technology standards in schools and colleges (March 2023)*
- *Behaviour in schools (September 2022)*
- *Mental Health and Behaviour in Schools (2021)*
- *Ofsted review of sexual abuse in schools and colleges (2020)*
- Department for Education *Child Sexual Exploitation. Definition and guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (Feb 2017)*
- *Counter Terrorism and Security Act 2015 and revised 2018*
- *Prevent duty guidance for further education institutions in England and Wales (Updated 2021)*
- *Working Together to Safeguard Children (2026)*
- *Online Safety Act (2023)*
- *DfE Information Sharing (2023)*
- *HM Government Information Sharing Advice for Safeguarding Practitioners (2023)*
- *Criminal Exploitation of Children and vulnerable adults: county line guidance (2017)*
- *Putting Children First (July 2016)*
- *Preventing youth violence and gang involvement (2013)*
- *Protection of Freedoms Act 2012*

- *Safeguarding Vulnerable Groups Act 2006*
- *Children Act 1989 and 2004*
- *Education Act 2002*

# Key personnel Safeguarding Team:

## Designated Safeguarding Lead (Senior DSL) – Jaye Crew (QTLP & Teaching Delivery Manager) *

IAF Mentoring Manager (Deputy DSL) – Edina Baines-Krawczyk

IAF Quality & Compliance Manager (Deputy DSL) – Craig Stevens

Safeguarding Link Trustee– Matthew Rooney

*carries operational responsibility for responding to safeguarding referrals.

# Linked documents

**This policy and procedure should be read in conjunction with the following IAF policies and procedures:**

IAF Procedures for dealing with allegations of sexual violence and harassment – attached at appendix 1
IAF Harassment and bullying statement of intent (students) – attached at appendix 2
IAF Online safety policy – attached at appendix 3
Responding to concerns about staff – attached appendix 4
IAF Safeguarding policy statement – attached appendix 8
IAF Safer recruitment policy
IAF Staff code of conduct and professional boundaries guidance
IAF Behaviour management policy and procedure including student code of conduct.
IAF IT acceptable use policy
IAF Social media guidelines (staff)

# Introduction

1. Within various pieces of legislation a child is defined as “everyone under age 18”, similarly an adult at risk is a person over the age of 18 years who may be unable to protect themselves from abuse, harm or exploitation, which may be by reason of illness, age, mental illness, disability or other types of physical or mental impairment.

2. IAF is committed to maintaining safeguarding arrangements that reflect current legislation, statutory guidance and recognised safeguarding practice. As an independent post-16 education provider, IAF uses Keeping Children Safe in Education and Working Together to Safeguard Children as key safeguarding benchmarks and applies the relevant principles to its provision. The policy is reviewed annually and updated where legislation, statutory guidance or local safeguarding arrangements change.

3. These procedures apply to all children and adults at risk who are suspected of being, or have been, abused or at risk of abuse. They also apply to young people of all ages at risk of being drawn into extremist activity. This includes all young people working with IAF, and for staff employed at IAF under the age of 18.

4. Safeguarding and promoting the welfare of children is defined in KCSiE as:
   - providing help and support to meet the needs of children as soon as problems emerge;
   - protecting children from maltreatment, whether that is within or outside the home, including online;
   - preventing the impairment of children’s mental and physical health or development;
   - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
   - taking action to enable all children to have the best outcomes.

5. Safeguarding and promoting the welfare of young people is everyone’s responsibility. In order to fulfil this responsibility effectively staff should ensure that their approaches are young person centred, this means that they should consider at all times what is in the best interests of the young person.

6. In the document *Putting children first (July 2016)* the Government set out its ambitions to support vulnerable children to lead a safe and positive life, to become successful adults and to have the kind of happy childhood that we all want for our children. Help and protection should be provided in a timely, enduring and flexible manner, and be the best it can be. This requires children, parents and carers affected by abuse to feel part of the solution and confident that they will be believed. Practitioners should work together to reduce the immediate risk of harm and collaborate to develop long term strategies to improve children’s and young people’s life chances.

7. The Human Rights Act 1998 sets out fundamental rights and freedoms that everyone in the UK is entitled to. Under this Act it is unlawful for colleges to act in a way that is incompatible with the Convention, specific convention rights that apply are: the right to freedom from inhuman and degrading treatment; the right to respect for private and family life; that all rights and freedoms within the Act are applied without discrimination; and the right to education. Being

subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any of all of these rights, depending on the nature of the conduct and the circumstances.

8. The primary responsibility for the protection of children rests with the parent(s)/carer(s). All agencies have the responsibility for the prevention, identification and reporting of child abuse. The Local Authority Children's Social Care Services has a main statutory duty to investigate alleged or suspected child abuse under Section 47 of The Children Act 1989 and also to provide appropriate support and child care services.

9. It is not the IAF's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is cause for concern and to notify the appropriate agencies so that they can investigate and take necessary action.

10. The Inspire and Achieve Foundation takes a whole charity approach to safeguarding and is committed to working with the Local Safeguarding Partners and to complying with their procedures. IAF recognises that it has a responsibility towards children to safeguard and promote their welfare and to take appropriate decisions about how this can be achieved. IAF has a responsibility to discuss any concerns they have with the family or carer in question, and where possible seek their agreement to making a referral to the relevant social care referral point (MASH for Nottinghamshire and Starting Point for Derbyshire) or the Early Help Team. However, such discussions or agreement should not be sought if to do so would:

    - place a child at increased risk of significant harm
    - interfere with criminal enquiries
    - raise concerns about the safety of staff members

11. The Senior DSL, Mentoring Manager and any other deputies are likely to have a complete picture in relation to safeguarding and are therefore the most appropriate people to advice on responses to safeguarding concerns or safeguarding issues more broadly.

12. IAF at any time has young people on work placement, IAF will ensure that the principles and procedures enshrined within this document are applied to young people on work placement or volunteering with local employers. IAF will work with employers to ensure they understand their responsibilities for safeguarding young people whilst in their business and for reporting any concerns they may have through IAF's procedures.

13. IAF's duties under the Counter Terrorism and Security Act 2015 (revised 2018) state that specified authorities have to have due regard to 'preventing people from being drawn into terrorism'. All agencies have a responsibility for the reporting of, protection from and prevention of people being radicalised.

14. IAF is committed to working proactively with the DFE regional Prevent coordinators, the Police Prevent Team and local Channel Chairs.

# Safeguarding – what all staff need to know

15. IAF operates within a whole charity safeguarding culture where we work on the principle that 'it could happen here'. All staff must exercise appropriate professional curiosity in understanding

changes in behaviour and attitude that may indicate that a young person is at risk of harm. All staff must act in the best interests of young people and their safety at all times.

16. IAF has high expectations in terms of young person behaviour, all staff should be familiar with and support the implementation of the behaviour management processes and procedures. Staff should recognise that poor behaviour can impact on young people' safety and well-being.

17. It is IAF's expectation that all members of the IAF community create a safe environment in which bullying, physical threats or abuse and intimidation are not tolerated, in which young people feel safe and everyone is treated respectfully. IAF will deal with any incidents of bullying, discrimination, aggression and derogatory language swiftly and effectively.

18. IAF recognises that a number of factors impact on a young person's behaviour and as such where IAF has serious concerns about a young person's behaviour it will consider whether a multi-agency assessment such as an early help assessment or statutory assessment that goes beyond educational needs would help support that young person.

19. Enshrined within legislation around safeguarding is the principle that all concerns raised by young people and vulnerable adults should be listened to and taken seriously, as such IAF operates on a policy of open engagement with young people – we will all take concerns seriously and take the necessary steps to ensure that we can respond to those concerns in the most appropriate way. Internally, IAF will work along the principles of working together to safeguard children, sharing information appropriately with colleagues is an essential part of our safeguarding obligations and will enable us to gain a holistic picture of potential risk and vulnerabilities.

20. All staff should be aware that young people may not feel ready or know how to tell someone that they are being harmed, abused, exploited or neglected and may not necessarily recognise their experience as harmful. Staff should exercise professional curiosity when working with young people, this includes accepting that the 'worst can happen' and seeking advice from the safeguarding team when needed. Staff should build trusting relationships with young people that may eventually help them to share their experiences.

21. Unexplained or frequent absences, particularly when prolonged or repeated, may be an early warning sign of safeguarding issues such as neglect, child sexual exploitation (CSE), and child criminal exploitation (CCE)—including county lines involvement. It is essential that all staff remain vigilant to patterns of absence and understand the potential safeguarding implications. Concerns about attendance must be reported promptly, so that any underlying issues can be identified and timely safeguarding interventions can be implemented. Where a young person is known to children's social care—including those who are care experienced, identified as a Child in Need, or subject to a Child Protection Plan—any absence must be reported immediately. For these young people, absence from education may significantly increase existing safeguarding risks within the home or community, and must be treated as a matter of urgency.

22. All IAF staff should be able to identify young people who might benefit from support before statutory intervention, including from universal services and community-based Early Help, or

the targeted early help level of Family Help. All school and IAF staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs whether or not they have an education health and care plan;
- has a mental health need
- is a young carer;
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or from care;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

23. Staff should seek advice and guidance from IAF designated safeguarding leads in the first instance for young people and adults who they feel may benefit from community-based early help.

24. Staff should have an understanding of the cohort of young people who have or have had in the recent past a social worker and should have an understanding of their academic progress, attainment and should have as high aspirations for these young people as they do for their peers. The Senior DSL carries cross charity responsibility for ensuring our most vulnerable young people, including those with a social worker, are provided with the support and adjustments necessary to ensure they can reach their potential and realise their ambitions.

25. Where young people need a social worker, this may indicate heightened safeguarding risks. A young person's experience of adversity and trauma can leave them vulnerable to further harm as well as facing barriers to attendance, learning, behaviour and mental health. The safeguarding team will keep on file a record of all young people with a social worker, whether or not they are placed on a formal plan for protection. We will work closely with the social care team to promote and protect the best interests of that young person and will inform IAF's procedures in relation to unauthorised absence and promoting welfare.

26. All staff should have the skills knowledge and understanding to keep previously looked after children safe. A previously looked after child potentially remains vulnerable. IAF will work proactively with other agencies to take prompt action where necessary to safeguard these young people and vulnerable adults.

27. All staff should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

28. All staff should be aware of 'contextual safeguarding' that is an awareness that safeguarding incident can be associated with factors outside the family home or IAF environment. All staff and designated personnel within IAF should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation. In this context it is important that staff provide as much information as possible when making a referral to social care or other agencies.

29. All staff should have an awareness of issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and the consensual and non-consensual sharing of nudes or semi-nudes images/videos can be signs that a young person is at risk.

30. Staff should be alert to the particular vulnerability of young people with learning difficulties/ disabilities. They are more likely to be isolated physically, geographically and socially and to experience feelings of rejection because of this. They are less likely to use mainstream facilities and resources and they are more likely to have communication difficulties. young people with learning difficulties/disabilities may suffer more severely from having little confidence and low self-esteem. There exists the potential for exploitation by more able peers and the misinterpretation of the nature of behaviour between young people themselves. Staff should take extra care when dealing with young people with learning difficulties/disabilities. Do not assume that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration. young people may come to IAF with an Education, Health and Care Plan (EHCP) in some cases the EHCP might detail factors that make a young person inherently more vulnerable to safeguarding concerns and as such factors should be discussed with the safeguarding DSL. IAF will consider additional support for young people with SEND needs and this includes support with communication.

31. IAF recognises that some children and young people may have medical conditions, allergies or healthcare needs requiring additional support. Having a medical condition does not, in itself, indicate a safeguarding concern. Staff must follow IAF's procedures for managing medical conditions, allergies and medical emergencies. Where an incident occurs, the DSL will consider whether the circumstances indicate a wider safeguarding concern, including possible neglect, abuse or exploitation. Safeguarding action may be required where essential medical information or medication is repeatedly not provided, appropriate care is not sought, or there are concerns that a child or young person is being deliberately placed at risk because of their medical condition. Where there is uncertainty, staff should report their concerns to the DSL.

32. A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Risks can be compounded where young people do not have a trusted adult with whom they can open up to. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out about any concerns and be themselves whilst with IAF. As with all other forms of bullying and child on child abuse IAF operates a zero tolerance policy.

33. The Cass Review identified that a careful approach is necessary when supporting children who are questioning their gender, as there remain uncertainties about the impact of social transition and children may have wider vulnerabilities, including complex mental health or psychosocial needs and, in some cases, additional needs. When supporting a child who is questioning their gender, IAF will consider the broad range of their individual circumstances and needs, with their safety, wellbeing and best interests at the centre of decision-making. Parents or carers will normally be involved as a matter of priority and their views considered, except where involving them may place the child at greater risk of harm. In these circumstances, the matter will be discussed with the DSL before contact is made or any decision is taken. IAF will also consider any relevant clinical advice that is available and wider vulnerabilities, including bullying, harassment, mental health, family or peer relationships and social isolation. Where a child shares their feelings or concerns with a member of staff but does not ask IAF to make changes to how they are supported, their confidentiality will normally be respected unless there is a related safeguarding concern or another reason why information needs to be shared. Decisions will be made on an individual basis and reviewed where circumstances change.

34. Staff should be alert to CCE and CSE, which can affect any child or young person under 18. Both involve an imbalance of power being used to coerce, manipulate or deceive a child into criminal or sexual activity, including through violence, threats, financial gain or exchange for something the child needs or wants. Exploitation may involve organised networks or gangs and may include trafficking and modern slavery. CCE can include county lines, transporting drugs or money, cannabis cultivation, shoplifting, vehicle crime, serious violence and coercion to carry weapons. CSE is a form of child sexual abuse and can involve grooming, sexual activity and technology-facilitated abuse. It can affect 16- and 17-year-olds who can legally consent to sex. Children may not recognise that they are being exploited and should be treated as potential victims. Staff should use professional curiosity and report concerns to the DSL, who will consider appropriate safeguarding action and, where relevant, child protection or modern slavery referrals.

35. Staff should be alert to indicators that a child may be at risk of, or involved in, serious violence. These may include increased absence, changes in friendships or peer groups, a significant decline in performance, signs of self-harm, assault or unexplained injuries. Staff should also be aware of factors that may increase vulnerability, including frequent exclusion or other disrupted education, experience of childhood maltreatment and previous involvement in offending. Concerns should be reported promptly to the DSL and considered within the child's wider safeguarding context, including the possibility that a child involved in violence may also be a victim or at risk of harm.

36. IAF recognises that domestic abuse can include a single incident or a pattern of behaviour, including physical, sexual, psychological or emotional abuse, controlling or coercive behaviour and stalking. Children can be victims of domestic abuse in their own right where they see, hear or experience its effects. This can have a significant impact on their health, wellbeing, development and ability to learn. Young people may also experience abuse within their own intimate relationships **(**teenage relationship abuse**),** including physical, sexual or emotional abuse, controlling or coercive behaviour and stalking, including online. This is a safeguarding concern and will be considered within the wider context of the child's welfare and safety.

37. All staff should be aware that mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental health difficulties are not, in themselves, safeguarding concerns. However, where a young person's mental health places them at risk of harm, or there is a significant deterioration in their presentation, this should be treated as a safeguarding concern and reported to the safeguarding team. This may include concerns relating to self-harm, suicidal thoughts or attempts, significant emotional distress, eating disorders, exploitation or other behaviour which places the young person at risk. IAF staff should not attempt to diagnose mental health conditions and should seek advice from the safeguarding team where they are concerned.

38. IAF works in partnership with a number of agencies and bodies to further extend our understanding of child and adolescent mental health and in particular the impact of trauma on mental health and on the behaviour of our young people. All staff should seek to understand the root cause of behavioural issues. IAF promotes personal resilience as part of its mentoring and King's Trust programmes, whereby young people are encouraged and supported to positively manage their own mental health and triggers.

39. All staff should recognise that children are capable of abusing other children (child on child abuse) and that abuse can happen inside and outside of IAF. IAF will take all reasonable steps to ensure that:

    - IAF minimises the risk of child on child abuse through the creation of an inclusive and welcoming environment and culture and where instances are challenged and acted upon quickly;
    - Allegations of child on child abuse will be investigated by IAF through either safeguarding or disciplinary procedures and will be dealt with in accordance with the IAF's published code of conduct;
    - Victims, alleged perpetrators/perpetrators and anyone else affected by child on child abuse will be supported by IAF's central student support team and where necessary will be provided with early help and/or external counselling support.

40. All staff should understand that even if there are no reports in IAF of child on child abuse it does not mean that it is not happening. If staff have **any** concerns regarding child on child abuse that they are reported to the safeguarding team in line with these procedures.

41. All staff should challenge inappropriate behaviours between young people as and when they observe them.

42. All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

43. IAF has a zero tolerance for all forms of harassment and abuse and recognises that abuse is abuse and will never be tolerated or passed off as 'banter', 'having a laugh' or 'just part of growing up'. IAF recognises the gendered nature of child on child abuse but will take all forms of child on child abuse seriously.

44. Child on child abuse can take different forms and is most likely to include but is not limited to:

- Bullying including cyber-bullying, prejudice based bullying and discriminatory bullying;
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- serious physical assault and harm, or the threat of harm with a weapon,
- 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 making or sharing of nudes and semi-nudes, including self-generated intimate images and/or videos and material generated or altered using AI, such as deepfakes
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

45. IAF will take account of Government advice when considering how to respond to allegations of child on child sexual violence and sexual harassment. Reports of sexual violence or sexual harassment are likely to be complex and will require difficult professional decisions to be made. It is important to assure all victims that their concerns are being taken seriously and that they will be supported and kept safe. The safeguarding team will make an immediate risk assessment and will take into account both the victim and the alleged perpetrator. IAF will also consider:

- The wishes of the victim.
- The nature of the alleged incident and whether any crime has potentially been committed.
- The ages of the people involved.
- Any power imbalance between victim and perpetrator.
- Risk factors and vulnerabilities of both victim and perpetrator.
- If the alleged incident is a one off or a substantiated pattern.
- Any ongoing risks to the victim, other young people or IAF staff.
- Other related issues and the wider context.

46. For more detailed guidance on definitions of sexual harassment, sexual violence and harmful sexual behaviour see appendix 1 (dealing with allegations of peer on peer sexual violence and harassment).

47. All staff should be able to reassure victims that they are being taken seriously and that their concerns will be reported and they will be kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual harassment or sexual violence. Victims should never be made to feel ashamed for making a report.

48. IAF's safeguarding processes cover its statutory duties for preventing radicalisation and extremism (the prevent duty). In March 2024, the government redefined the definition of extremism as: Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

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

49. An essential part of IAF's safeguarding culture is safeguarding young people from harmful and inappropriate online material. The safeguarding team take the overarching responsibility for following up on these concerns. In addition IAF embeds an understanding of online safety and the maintenance of a professional online presence as part of its programmes. IAF's approach to online safety is one that takes account of the '4Cs':

    - Content – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
    - Contact – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
    - Conduct – online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including self-generated intimate images and/or videos and images generated or altered using AI, such as deepfakes, online bullying and harassment.
    - Commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, young people or staff are at risk, please report it to the Anti-Phishing Working Group https://apwg.org/

50. IAF will respond to concerns involving self-generated intimate images, including AI-generated or altered images such as deepfakes, in line with safeguarding procedures. Staff should report concerns to the safeguarding team and should not copy, save, forward or ask a young person to download or share the imagery.

51. IAF has implemented appropriate filtering and monitoring measures across its digital systems and devices, in line with the requirements set out in the government guidance on Filtering and monitoring standards for schools and colleges. The Quality and Compliance Manager, supported by the Chair of the Board, has overall responsibility for the organisation's filtering and monitoring arrangements, including ensuring that appropriate safeguards are in place across IAF devices and that these arrangements are regularly reviewed.

52. IAF recognises the importance of ensuring that generative artificial intelligence (AI) is used safely and appropriately within the educational setting. Filtering and monitoring arrangements will apply to the use of generative AI tools where appropriate, in line with Department for Education guidance. IAF will take account of the DfE's Generative AI: Product Safety Expectations when considering the use of AI products and will ensure that appropriate safeguards are in place to help protect children and young people from harmful or inappropriate content and other online risks associated with generative AI.

53. To support the safety and wellbeing of children and young people, IAF will take appropriate steps to follow the Cyber Security Standards for Schools and Colleges. These standards support educational settings to strengthen their systems and processes, reduce the risk of cyber-attacks, which could compromise sensitive data and disrupt essential safeguarding functions.

54. In addition, IAF recognises the requirements of the Online Safety Act 2023. This legislation places new duties on online platforms to protect children from harmful content. While providers such as IAF are not directly regulated under the Act, our online safety approach will reflect its expectations by ensuring young people are protected from harmful and illegal content online, any by promoting digital resilience in line with statutory safeguarding duties.

55. IAF's online safety policy sets out its expectations in terms of behaviour online. IAF does not restrict or prohibit the use of young people' own devices, however, any incident of bullying and/or harassment using personal devices will be dealt in line with IAF's code of conduct, this includes incidents that may occur outside of IAF time.

56. IAF will inform parents/carers of IAF's online safety policies and procedures which are attached at appendix 3 to this procedure.

# How to report a concern – our safeguarding processes

57. All staff **must** make themselves aware of how to report a concern. Staff **must** respond quickly to concerns being raised. Our procedure is based on the Recognise, Report, Respond, Record principles:

**Recognise**

A change in behaviour, attendance, punctuality, appearance? Told something or hear something? Does your professional judgement tell you something may be not quite right? **Exercise professional curiosity**

**Respond**

Respond positively, listen but do not judge, prompt or question what you are being told.

**Report**

Use IAF's SG1 reporting system to record a concern with the safeguarding team. Do this within 2 hours. If your concern is about a staff member make contact with Jaye Crew Senior DSL

**Record**

Your concern is followed up by trained staff within the safeguarding team and where necessary reported to external agencies. They will record actions, progress and outcomes on an SG2 form.

58. **All** safeguarding or prevent-related concerns/disclosures **must** be reported following the safeguarding procedure**. Concerns must be reported to the team within 2 hours of the concern or disclosure.**

59. If a young person is making a disclosure, you need to ask questions but keep them to a minimum and do not ask leading questions. The use of leading questions can cause problems for the subsequent investigation and any court proceedings. Listen without judgement.

60. Reassure the young person that they have done the right thing in reporting the incident to you. Inform them that you will need to pass the information on to the team. Do not promise confidentiality as the team may need to share the information with external agencies, and for young people aged 16-18, parents.

61. Comprehensive and factual notes of the incident must be made within **2 hours**, including:

- clear and comprehensive summary of the concern
- your name and the names of others present
- the name of the young person at risk and any other linked young person(s).

62. ***A disclosure is:*** When a person tells you that something has happened. Disclosures should be reported to the safeguarding team using our procedure, do not promise confidentiality.

63. ***A concern is: when you feel that something may not be right with a young person and have not been told anything. You may choose to report your concern immediately to the safeguarding team without speaking to the young person or you may raise your concerns with the young person prior to reporting or seek advice and support from the safeguarding team prior to formally raising a new incident.***

64. Please note that the safeguarding team work normal IAF hours (9.00am – 5pm) and have a rota of staff available outside of term time, as such concerns that are raised through our safeguarding reporting systems after 5pm may not be looked at until the next day. During afterhours work such as residential QTLP & Teaching Delivery Manager on standby for urgent safeguarding concerns.

65. If you are unable to reach any out of hours contacts and there is a pressing and urgent risk of harm staff must make a referral to the multi-agency safeguarding hub (MASH) team themselves at the following web link, for young people residing in Derbyshire referrals should be to the Starting Point service. Other concerns may be more appropriately dealt with by emergency services such as the police or ambulance service and these should be reported by dialling 999. Staff should let the safeguarding team know that a referral has been made. https://www.nottinghamshire.gov.uk/care/safeguarding/childrens-mashhttps://www.derbyshire.gov.uk/social-health/children-and-families/support-for-families/starting-point-referral-form/starting-point-contact-and-referral-service.aspx

66. Examples that constitute an urgent concern and appropriate action include but are not limited to:

- A young person disclosing that they have taken an overdose. If DSL not available call for an ambulance to the home address. You would not need consent from the individual if you felt that the person was at risk of serious injury/death.

- A young person telling you that they are going to kill themselves and have a plan to do so. If DSL not available, try to call parents/carers (if under 18) to check in, if they are not available either call the police for a safe and well check or the ambulance. Again you would not need consent if the individual was at serious risk of harm
- A young person under 18 telling you that they fear for their safety because of abuse in the home. If DSL not available call this in to the out of hours team at either MASH (Notts) or Starting Point (Derbyshire). If the young person is over 18 advise them to phone this into the police themselves or if they are unable to do so call the police with their consent.
- A young person under the age of 18 telling you that they have been kicked out of home and have nowhere to go. If DSL not available call into the out of hours duty team at MASH or Starting Point.

67. **Do not** investigate any allegation that has been disclosed to you or any concerns that you might have. This is undertaken by external agencies if appropriate. They will be contacted by the DSL. See FGM Mandatory reporting requirements contained at the end of this procedure.

# Responding to a concern – the role of the safeguarding team

68. Incidents reported through SG1 will initially be assessed on a triage basis, with the most urgent concerns being dealt with first. The designated person will review the concern and, where appropriate, meet with the young person and/or gather further information. The SG1/SG2 record will include a clear summary of the concern, how it has been followed up, any information gathered, action taken, decisions made, the rationale for those decisions and the outcome. The designated person will record whether the concern has been resolved or whether further monitoring or action is required. Feedback will be provided, where appropriate, to the staff member who raised the concern and to other staff who need to be aware of the concern or outcome.

69. Serious and/or complex cases will be discussed with the Senior DSL. Decisions about the appropriate action and any referral or escalation will be recorded, including the rationale for the decision. The Senior DSL will review the SG1/SG2 record before the incident is closed and confirm that appropriate action has been taken and whether any further action, monitoring or review is required. An incident should only be closed when the rationale for closure and the outcome have been clearly recorded.

70. IAF follows current government information-sharing guidance and any statutory information-sharing requirements that apply to the organisation. Safeguarding children and young people is a legitimate and necessary basis for sharing relevant information where this is required to protect them from harm. Data protection legislation must not be used as a reason to prevent appropriate safeguarding information sharing. Information should be shared proportionately, securely and with those who need it to safeguard the young person. Where staff are unsure whether information should be shared, they should seek advice from the DSL.

71. Information sharing is vital in identifying and tackling all forms of abuse and neglect and in promoting young people' welfare including educational outcomes. IAF has clear powers to share, hold and use information for these purposes for children under the age of 18.

72. For young people under the age of 18, concerns would usually be shared with parents in line with guidance in keeping children safe in education. Parents would not be informed where it may well cause greater risk of harm to the young person. Reasons for not informing parents will be logged and, should a referral to social care be needed, flagged with the DSL.

73. For young people over the age of 18, IAF would usually need to seek consent to share information with other professionals, agencies and next of kin. However, where the team assess significant and imminent risk, for example, risk of suicide, the Senior DSL may authorise sharing information without consent. The lack of consent will be made explicit when sharing information.

74. All staff need to understand relevant data protection principles and how they relate to safeguarding matters. GDPR allows the processing and storage of sensitive and personal information in relation to safeguarding, this should be treated as 'special category data'. Safeguarding of children and individuals at risk is a processing condition that allows practitioners to share special category data. This includes allowing practitioners to share information without consent where there is good reason to do so. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare and protect the safety of children. The safeguarding team will be the ones to share data and information and if in doubt about sharing information with other professionals please seek their advice in advance.

75. The Senior DSL is accountable for ensuring that safeguarding records are detailed and accurate and record the concern, actions taken, decisions made, the rationale for those decisions and the outcome. This includes the rationale for a referral or decision not to refer to an external agency and, where appropriate, the rationale for not communicating concerns to parents or carers. For young people over the age of 18, where information is shared without consent, the rationale for doing so will be recorded within the safeguarding file.

76. Safeguarding information must be transferred securely and without unnecessary delay when a child moves between education settings or when IAF shares responsibility with another provider. Where there are significant safeguarding concerns, IAF will consider direct professional contact between safeguarding leads to support continuity of protection.

77. IAF will maintain robust cover arrangements so safeguarding concerns can be acted on without delay when the DSL is unavailable. Deputies will have appropriate training, authority, skills and experience to carry out safeguarding responsibilities.

# Storage and transfer of files

78. All copies of records, either electronic or paper based, **MUST** be kept in a secure place; e.g. paper based records in a safe and electronic records should be in a secure and restricted folder.

79. IAF will, wherever practical, store and keep up to date two emergency contact details for all young people and particularly those under the age of 18 or who is deemed a vulnerable adult.

80. Where young people leave IAF for another provider, IAF will take all reasonable steps to ensure the transfer of safeguarding files to the new provider as soon as possible. IAF will work with local providers and the local authority to ensure that files are transferred to IAF in a timely manner after a young person enrols with us, IAF will have an information sharing protocol in place to enable this to happen securely.

# Raising concerns about members of staff

81. Any suspicion, allegation or actual abuse of a young person by a member of staff, including supply staff, volunteers and contractors, must be reported to the Senior DSL, Jaye Crew immediately.

82. In the event of a concern about the Senior DSL **IAF Director Pippa Carter must be informed**.

83. In the event of a complaint against a senior post holder, the Chair of Board should be informed. Senior post holder at IAF is the Director.

84. All staff should be aware of their professional boundaries and **must** not cross them, they also need to be aware that their relationships and associations (including online) may have a safeguarding implication.

85. Any allegations will be managed in line with Keeping Children Safe in Education statutory guidance. All such allegations against a member of staff which meet the harm threshold will be reported to the Local Authority designated officer in the first instance. Staff should be aware that such an allegation could result in a referral to the Disclosure and Barring Service (DBS) and the National Council for Teaching and Leadership. The Senior DSL will use NPCC guidance, *"When to Call the Police"* to determine whether the police need to be involved. However, not all concerns will meet the harm threshold. IAF encourages and promotes a culture whereby staff feel enabled to report concerns about a colleague's conduct and have confidence that those concerns will be taken seriously. **All** concerns whether or not they meet the harm threshold will therefore be recorded to enable IAF to build a picture of suitability over time.

86. Low level concerns are those that do not meet the harm threshold. It does not mean that these concerns are not significant, a low level concern is **any** concern, no matter how small, and even if no more than a 'nagging doubt', that an adult working on behalf of IAF may have acted in a way that is inconsistent with the staff code of conduct, examples can include but are not limited to:

- Being over friendly with young people;
- Having favourites;
- Taking photographs of young people on their personal mobile phones;
- Engaging with a young person on a 1:1 basis, behind closed doors or in a secluded area; and/or
- Using inappropriate, intimidating, offensive or overly sexualised language.

87. Such behaviour exists on a spectrum from inadvertent/thoughtless or behaviour that may look to be inappropriate but may not be in the specific circumstances through to what is ultimately intended to enable abuse. It is important therefore that concerns are shared with the Senior DSL (Jaye Crew) who will make a judgement about seriousness and where necessary seek advice from the LADO. Concerns raised about contractors and supply staff will be shared with the individual's employer and may be escalated to the LADO.

88. IAF has a duty to ensure that all staff and volunteers who work with children under the age of 18 are suitable to work with children. Staff may behave in a way that may call into question their suitability to work with children and these allegations or actions may take place outside of the IAF environment and may not directly involve children, for example a member of staff may be accused of a domestic violence incident where no children were involved. IAF will consider what triggered such action and the potential for such triggers to be present within IAF. This will be managed by the senior management team through a process of risk assessment. IAF reserves the right to attend any court proceedings related to incidents with staff members where there is some question, as a result of the incident, that the individual may no longer be suitable to work with children and young people. Staff should report where they may be involved with social care for their own children as this may need to be referred to the LADO for further investigation.

89. Staff may receive concerns or allegations related to the conduct of staff employed by a third party, for example, a partner, community group, employer or work placement provider. As with any concerns about staff members, these concerns should be reported to the senior DSL as soon as possible so that escalation to the LADO and the third party can be managed appropriately.

# Raising concerns about safeguarding practice.

90. All staff have the right to raise concerns about IAF's safeguarding practices. Whilst any member of staff can raise concerns with any of the senior management team, it can also be done using IAF's whistleblowing procedure.

91. Where a staff member feels unable to raise an issue with IAF through these procedures or feels that their genuine concerns are not being addressed, other channels may be available to them including via local safeguarding partners and/or through Ofsted processes. The NSPCC whistleblowing helpline is an alternative route for staff who do not feel able to raise concerns internally. They can be contacted on 0800 028 0285 or email help@nspcc.org.uk.

# Staff Training

92. All staff and volunteers must complete mandatory safeguarding training as part of their induction with IAF. As part of the induction process, all new staff are provided with:
    - An induction video outlining IAFs safeguarding procedures and expectations
    - Part One of Keeping Children Safe in Education (KCSIE)
    - The IAF Safeguarding Policy
    - Employee Handbook – Code of Conduct, Professional Boundaries and Online Safety Policy

Staff are expected to read and understand these documents as a condition of employment.

In addition to the induction training, all staff are required to:

- Attend an annual safeguarding and Prevent update
- Re-read and confirm their understanding of KCSIE Part One each academic year
- Review any **updated safeguarding and child protection procedures**

Training records will be maintained to ensure compliance and to support a culture of continuous safeguarding awareness across the organisation.

93. In addition, all staff should receive regular safeguarding and child protection updates, including online safety (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

94. All members of staff with formalised responsibilities for safeguarding (DSL and deputies) will undertake formalised training through the local authority every two years.

95. The Board will be provided with a safeguarding overview as part of their induction and are expected to attend the annual mandatory safeguarding updates.

# Female genital mutilation – mandatory reporting procedure

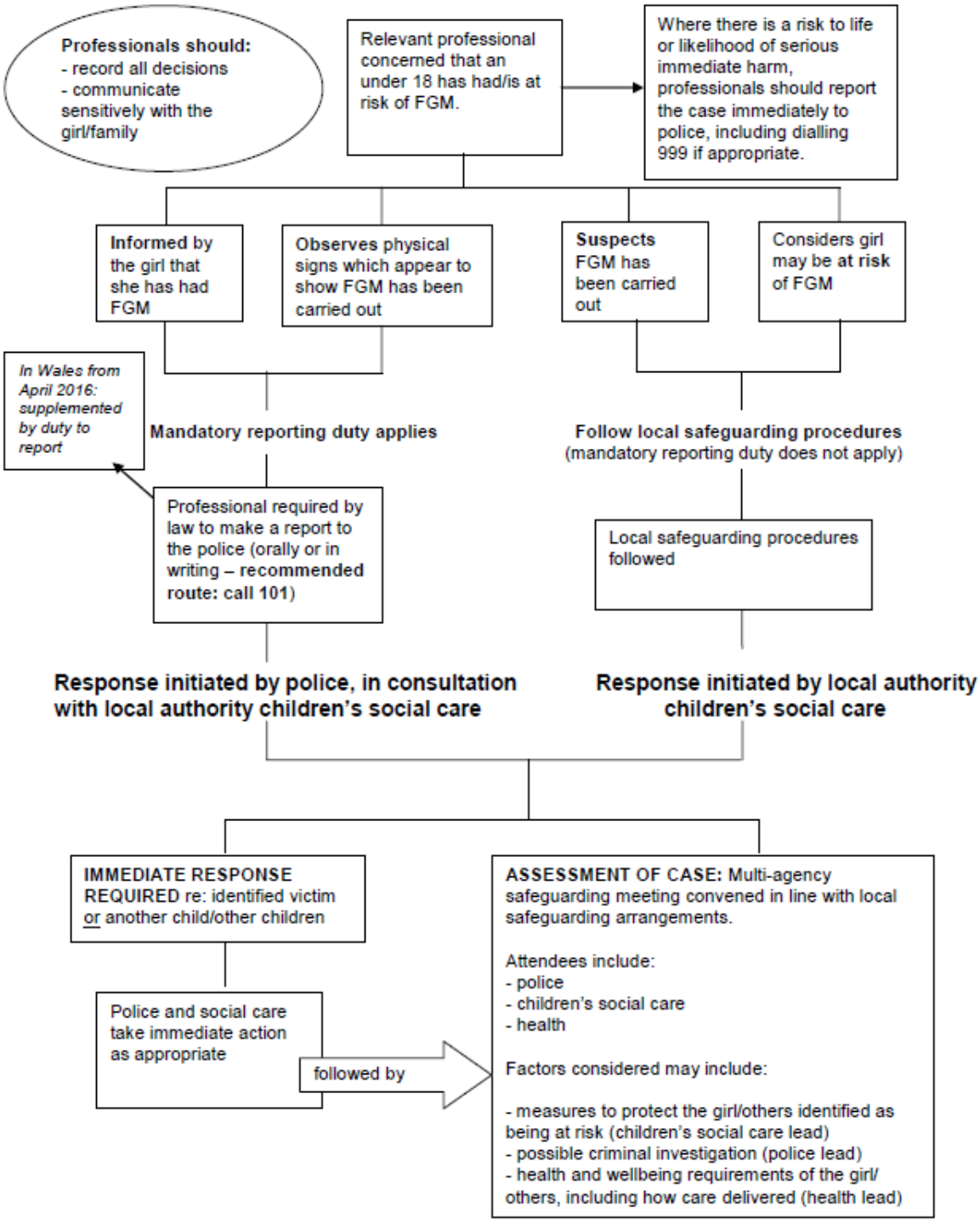
Where a member of staff is a teacher, or another professional to whom the statutory FGM mandatory reporting duty applies, they must comply with the personal duty to report to the police where they discover that FGM appears to have been carried out on a girl under 18, in accordance with current legislation and statutory guidance. The duty applies where the professional discovers the case through a direct disclosure by the victim or visual evidence and does not apply to suspected or at-risk cases alone. Staff must not examine a young person to establish whether FGM has occurred. Any member of IAF staff who has a concern about FGM or other honour-based abuse must report it to the safeguarding team immediately and should not investigate the concern. The DSL will support the member of staff and make any safeguarding referral required. Where the statutory personal reporting duty applies, the duty remains with the individual professional and cannot be transferred to the DSL.

The duty is a personal duty which requires the individual professional who becomes aware of the case to make the report; the responsibility cannot be transferred.

**All members of staff must contact the Safeguarding team within 2 hours of a disclosure following IAF's Safeguarding procedure. The team will then support any staff member that needs to report an informed case of Female Genital Mutilation to the police. The legislation does not prevent you from sharing information with the DSL and seeking further advice.**

The FGM process map is included overleaf:

*This process map is intended to demonstrate where the FGM mandatory reporting duty fits within existing processes. It is not intended to be an exhaustive guide, and should be considered in the context of wider safeguarding guidance and processes.*



# Appendix 1

# Procedure for dealing with allegations of child-on-child abuse (including harassment and violence) (including online)

## Introduction

1. Sexual violence and sexual harassment can occur between two young people of any age and sex. It can occur through a group of children sexually assaulting or harassing a single young person or a group of young people. Issues exist on a continuum and can occur face to face and online. IAF maintains an attitude of it can happen here.

2. Addressing inappropriate behaviour (even if it appears relatively low level) is important in developing a culture where harassment of any kind is not tolerated, where concerns are taken seriously and appropriate action taken to keep young people safe.

3. young people who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This may adversely affect their educational attainment and these factors are likely to be exacerbated if the alleged perpetrator also attends IAF.

4. Along with providing support to victims, IAF will weigh the need to provide the alleged perpetrator with an education, with welfare support and the need to implement any disciplinary sanctions.

5. IAF has a zero tolerance to any form of abuse or harassment and this extends to sexual violence and sexual harassment. IAF recognises that abuse is abuse and will never be tolerated or passed off as 'banter', 'having a laugh' or 'just part of growing up'. IAF recognises the gendered nature of child on child abuse but will take all forms of peer on peer abuse seriously.

6. Children with special educational needs and disabilities (SEND) are three times more likely to be abused by their peers. Additional barriers can exist to identifying abuse and this may include dismissing indicators of abuse as part of an individual's identified need. It is therefore essential that we never dismiss concerns raised by young people with SEND.

## Definitions

7. **Sexual violence**, these are largely offences under the Sexual Offences Act 2003 and include:

   - Rape – intentional sexual penetration of the vagina, anus or mouth of the victim with the perpetrator's penis without consent.
   - Assault by penetration – intentional sexual penetration of the vagina or anus with a part of his/her body or other object without consent.

- Sexual assault - intentionally touching another person in a sexual way without consent, this covers a wide range of behaviour in that a single act of kissing or touching of the bottom or breast without consent can still be considered sexual assault.
- Causing someone to engage in sexual activity without consent – this can include forcing someone to strip, to touch themselves sexually, or to engage in sexual activity with a third party.

8. **Sexual Harassment – this relates to unwanted conduct of a sexual nature that can occur online and both inside and outside of IAF. Sexual harassment is likely to violate a young person's dignity and/or make them feel intimidated, degraded and/or humiliated. Sexual harassment can include but is not limited to:**

    - Sexual comments – telling stories, making lewd comments, making sexual remarks about clothes or appearance and calling someone sexualised names;
    - Sexual jokes or taunting;
    - Physical behaviour such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos, or drawings of a sexual nature; and/or
    - Online sexual harassment, this may be standalone or part of a wider pattern and may include consensual or non-consensual sharing of nudes or semi-nudes, sharing explicit and unwanted content, upskirting, sexualised online bullying, unwanted sexual comments and messages and sexual coercion or threats.

9. **Harmful sexual behaviour** – sexual behaviour exists on a wide continuum from normal and developmentally appropriate to problematic abusive or violent. Figure 1 below provides more detail. Harmful sexual behaviour is an umbrella term widely used in child protection that deals with behaviour that is developmentally inappropriate and may cause developmental damage.

**Figure 1**

| Normal | Inappropriate | Problematic | Abusive | Violent |
|---|---|---|---|---|
| - Developmentally expected<br>- Socially acceptable<br>- Consensual, mutual, reciprocal<br>- Shared decision-making | - Single instances of inappropriate sexual behaviour<br>- Socially acceptable behaviour within peer group<br>- Context for behaviour may be inappropriate<br>- Generally consensual and reciprocal | - Problematic and concerning behaviour<br>- Developmentally unusual and socially unexpected<br>- No overt elements of victimisation<br>- Consent issues may be unclear<br>- May lack reciprocity or equal power<br>- May include levels of compulsivity | - Victimising intent or outcome<br>- Includes misuse of power<br>- Coercion and force to ensure victim compliance<br>- Intrusive<br>- Informed consent lacking or not able to be freely given by victim<br>- May include elements of expressive violence | - Physically violent sexual abuse<br>- Highly intrusive<br>- Instrumental violence that is psychologically and/or sexually arousing to the perpetrator<br>- Sadism |

Source: Hackett, S, 'Children, young people and sexual violence' in 'Children behaving badly? Exploring peer violence between children and young people', 2010.

10. **Consent -** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.
    - A child under the age of 13 can never consent to any sexual activity
    - The age of consent is 16
    - Sexual intercourse without consent is rape.

# Creating a culture of zero tolerance

11. **All staff have a responsibility to challenge inappropriate sexual comments and actions whenever they observe them. This enables IAF to foster a culture where young people feel confident that whilst this behaviour may happen, swift action is taken to address it.**

12. At induction all young people will be made aware of our expectations, where firm ground rules are set and young people understand what constitutes abuse and harassment and the actions that will be taken to address issues.

13. Visual displays in classrooms will highlight our zero tolerance approach and signpost young people to where they can go to report a concern.

14. A young person is likely to disclose abuse to an adult that they trust and it is therefore important that all staff are aware that they may receive a disclosure from a young person. All staff have a responsibility to report concerns to the safeguarding team, using our safeguarding procedures where they feel those concerns or issues are putting a young person at risk of harm, if in doubt staff should seek advice from the safeguarding team. It is important that the staff member receiving the initial disclosure reassures the young person they have done the right thing in coming forward but should never promise confidentiality as it may well be in the best interests of the victim to share information with parents and report concerns to external agencies.

# Responding to an allegation of sexual violence or harassment

15. The Senior DSL will take the lead in response to allegations of sexual violence or harassment.

16. It is important that victims are assured that they are being taken seriously and they will be supported and kept safe. Abuse that occurs outside of IAF should not be downplayed and be treated equally as seriously.

17. The safeguarding team will consider the wishes of the victim in terms of how they want to proceed. Victims will be given as much control as reasonably possible but this will be balanced against IAF's legal duty to act to protect children and vulnerable adults.

18. The safeguarding team will be responsible for putting in place a risk assessment that considers the proximity of victim and alleged perpetrator and steps and safeguards that need to be taken to keep both parties separate from each other. Where there is an allegation of sexual violence (especially rape or assault by penetration) and both young people share the same classes, immediate steps will be taken to remove the alleged perpetrator from the class and alternative arrangements made for them to continue with their studies. Risk assessments will be done using the template attached to this procedure and will be shared with the Senior DSL.

19. The Senior DSL, will make an assessment, in consultation with the victim, about whether a crime has been committed and therefore the allegation needs reporting to the police. If this is the case the victim will be supported to do so. If it is not clear whether a crime has been committed but allegations meet thresholds for social care intervention then a referral will be made to the relevant social care team for the young person.

20. Consent would be sought prior to making the referral, however, for young people aged between 16-18 referrals can be made without consent, parents would usually be informed of allegations for young people aged 16-18. For allegations made for young people over the age of 18 IAF would not make referral or reports to external agencies without the consent of the individual.

21. The safeguarding team will make an assessment of when to inform the alleged perpetrator of the allegations. Where a report is going to be made to either the police or social care advice would be sought from the relevant agency and next steps considered and led by that agency. This does not stop IAF taking steps to safeguard young people (e.g. separating the victim from alleged perpetrator).

22. There are largely four routes through which IAF may choose to manage allegations:

- Internal investigation – where incidents are one-off, are relatively low-level and where no crime has been committed. young people are not in need of early help and no referral is necessary to external agencies. Outcomes of the investigation will be recorded and investigations conducted in line with a zero tolerance approach. Disciplinary sanction where necessary will be used.
- Early help – this can link to the internal investigation and may include early help from within IAF or more formally through an early help referral to social care. Decisions, discussions and reasons for decisions should be recorded.
- Referral to children's social care – where a child has been harmed, is at risk of harm or is in immediate danger a referral should be made to children's social care. At the point of referral IAF will work alongside the statutory agencies. Steps to minimise risk to young person in IAF will still be taken by IAF in liaison with social care with care taken that any measures put in place by IAF do not jeopardise the investigation. The investigation will be led by social care with the support of IAF. Details of reports, concerns will be logged by the Senior DSL.
- Reporting to the police – Any report to the police is likely to be in parallel to a report to social care and will be made when a crime has been committed. The team will consult with police and what information can be shared with staff and others. They will also discuss the best ways to protect the victim and their anonymity. The police will consider what action to take and this may be the imposition of bail conditions that limits the alleged perpetrator's access to IAF. Consideration will need to be given as to how to enable the alleged perpetrator to continue with their studies.

23. When concerns are referred to external agencies IAF will be led by them in terms of the information the alleged perpetrator is given of concerns raised. It is often the case that the police or social care want to take the lead in communicating with the perpetrator. In this case agencies will keep IAF informed and advise on any additional measures that need to be put in place to protect the victim.

24. On conclusion of the investigation, even where statutory agencies report no further action, IAF will consider what steps it needs to take to continue to support and protect the victim. Considerations will include what ongoing support they need to come to terms with what is likely to be a traumatic incident. Consideration should be given to the victim's wishes and a desire wherever possible to keep them in IAF and learning.

25. IAF will also consider what action needs to be taken to support the alleged perpetrator. Consideration should be given as to whether the perpetrator themselves could be a victim of abuse and what can and should be done to stop reoffending behaviour. It is likely that a risk assessment will remain in place, the safeguarding team will meet with the parents of the alleged perpetrator (for young people under the age of 18) to explain the risk assessment and any measures that have been put in place.

26. If allegations are found to be malicious, unfounded or false the safeguarding team will consider whether the victim may need support, whether the allegation was a cry for help or where clear evidence exits that allegations were deliberately invented or malicious whether any disciplinary action needs to be taken.

27. Finally, IAF will consider what support and action needs to be taken to protect and safeguard other young people who may have witnessed incidents or may have been supporting either the victim or alleged perpetrator.

**Serious Sexual Violence and Sexual Harassment – Assessment of risk**

| **Date risk assessment completed:**<br>**Name of young person (victim):**<br>**Age:**<br>**Other young person involved:**<br>**Age:** | |
|---|---|
| **Considerations** | **Summary of considerations, risks and mitigations.** |
| The wishes of the victim. How do they want to proceed? | |
| What is the nature of the alleged incident – has a crime been committed and does it involve harmful sexual behaviour? | |
| Developmental stages of the young people involved – are there any signs of developmental delay? | |
| Any power imbalances? | |
| Does either young person have a disability or learning difficulty? | |
| Are victim or alleged perpetrator known to social care or have any other vulnerabilities? | |
| Is the incident one off or sustained abuse? | |
| Are the young people in a relationship? | |
| Do the young people study within the same area or classroom – how easy is it to keep young people separate? | |
| Are external agencies or the police involved? | |
| Are there any bail conditions that impact on the IAF's decision making? | |

| | |
|---|---|
| Are there ongoing risks to the victim and potentially other IAF young people? | |
| Links to CCE or CSE? | |
| Links to intra-familial harm – any support needed for siblings at the IAF as a result of the incident? | |
| Other considerations | |

| |
|---|
| **Summary of key risks and any mitigating factors:** |

| |
|---|
| **IAF actions – to be reviewed on:** |

Appendix 2

## BULLYING AND HARASSMENT STATEMENT OF INTENT

### INTRODUCTION

1. IAF does not accept any form of bullying or harassment. young people, staff members and visitors have a right to be treated with dignity and respect.

2. Bullying and harassment includes but is not limited to: the use of abusive or derogatory language, physical violence, verbal threats; and taking and circulating unwanted images or videos.

3. Bullying and harassment can be child on child, staff on young people or young person on staff members. All incidences will be taken seriously.

4. Bullying and harassment, especially if left unaddressed, can have a devastating effect on individuals. It can be a barrier to their learning and have serious consequences for their mental health. Bullying and harassment does not only affect an individual during adolescence but can have a lasting effect on their lives well into adulthood.

5. By effectively preventing and tackling bullying and harassment, IAF can help to create a safe, disciplined and inclusive culture where young people develop the skills and knowledge to prepare well for life in modern Britain.

6. In all cases the principles of 'natural justice' are applied when a complaint is investigated, namely:
    - the complaint shall be dealt with in good faith, and in an impartial and fair manner
    - that all concerned - complainant and the person or persons to whom the claim is addressed - shall have the right to a fair hearing, and to know the reasons for any decision made.
    - that the complainant and the person or persons to whom the complaint is addressed shall be aware of statements and arguments brought by the other in relation to the complaint.

### PURPOSE

7. IAF aims to ensure that we operate in an inclusive environment where effective learning can take place. This statement of intent promotes and encourages all young people to achieve and maintain acceptable standards of conduct for academic performance; it will also strengthen the message that there are clear consequences for inappropriate behaviour conducted for any young person using IAF services.

8. IAF is committed to ensuring that all young people who may be subject to disciplinary processes are dealt with in a fair and equitable manner, whilst taking into account the individual circumstances of each young person involved.

9. The young person Code of Conduct will be used to support the Bullying and Harassment Statement of Intent where needed.

**SCOPE OF STATEMENT OF INTENT**

10. Applies to all staff who have an active role to play to promote an inclusive culture, can identify the signs of bullying and harassment and follow the actions that need to be undertaken if bullying and harassment is suspected.

**DEFINITIONS**

11. The below are the definitions of bullying and harassment.

**BULLYING**

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between people, or perceived differences.

**CYBERBULLING**

Cyberbullying is bullying that takes place over digital devices or platforms. With the rapid development and widespread access to technology, technology has provided a new medium for 'virtual' bullying. Cyber-bullying is a different form of bullying and can happen at any time of the day and can be potentially shared with a bigger audience.

**HARASSMENT**

Harassment may be directed at an individual or a group. Under The Equality Act 2010, harassment is defined as "Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual."

**SEXUAL HARASSMENT**

Sexual harassment is unwelcome conduct of a sexual nature towards another person which could reasonably be expected to make that other person feel offended, humiliated or intimidated. A single incident is enough to be considered sexual harassment - it does not have to be repeated behaviour.

The person engaging in unwelcome behaviour does not have to intend to be sexually harassing the other person for the behaviour to be considered sexual harassment. Regardless of what was intended, sexual harassment is defined by the nature and the impact of the behaviour, not the intention behind it.

**PROCEUDRES FOR DEALING WITH ALLEGATIONS**

- Reassure the young person that they have done the right thing in reporting the incident of bullying or harassment and it is important to portray a calm, non-judgmental and positive response to the young person.
- If you feel you are the victim of bullying or harassment - act promptly and tell any member of IAF staff.
- All disclosures about bullying and harassment will be taken seriously and treated sensitively. It is important to discuss all possible and desirable strategies with the victim in the first instance and proceed as appropriate.
- Restorative questions will be used by staff when speaking to alleged victims to ensure a fair process and that individuals have had the opportunity to have their say.
- Notes will be taken regarding the discussion and the staff member will ask the young person to complete a statement, which must be signed to declare a true reflection of events. It should be made clear that statement may be shared with the person who the complaint is about.
- An investigation will be undertaken and the young person or Staff Disciplinary Procedure may be followed against the alleged bully.
- Bullying and harassment that takes place outside IAF, but involves an IAF young person or staff member will be investigated and acted upon by IAF staff.
- If the bullying and harassment could be deemed as criminal or poses a serious threat to the lives of young people or the public, the Police will be informed immediately.
- Confidentiality will be maintained, but it cannot be guaranteed. If a young person decides not to take any further action after reporting the incident, IAF reserves the right to investigate the incident and apply disciplinary sanctions where appropriate. IAF will not investigate anonymous complaints.
- In some circumstances, if the young person is under the age of 18, IAF may make an informed decision whether to involve the young people' parents or guardian.
- Restorative meetings will be held on some occurrences to explore a resolution where appropriate; on other occasions, a Behaviour Contract may be introduced as the best course of action.
- If the young person or staff member decides the matter is best resolved informally, an accurate record should be kept. In some cases, speaking directly with the person concerned can be enough to end the situation. For example, sometimes young people do not realise that their conduct is causing offence and explaining this to them is enough to make them rethink their behaviour.
- If the matter needs to be addressed through a more formal process or there is a serious safeguarding concern this needs to be reported to IAF's Safeguarding Team.
- If there are allegations of staff bullying or harassment this needs to be forwarded to the Senior DSL for appropriate action in line with IAF's safeguarding procedures.

## Introduction

1. IAF recognises the opportunities that technology offers to teaching, learning, engagement and communication.

2. However, the accessible and global nature of the internet and the variety of technologies available mean that we are also aware of potential risks and challenges associated with such use. Our approach is to implement safeguards within IAF and to support staff and young people to identify and manage risks independently. We believe this can be achieved through a combination of security measures, training and guidance and the implementation of our associated policies. Our online safety policy extends to the use of generative AI and other emerging technologies.

3. Our duties enshrined within keeping children safe in education require us to do all we can to ensure that our young people stay safe online and further, ensure they are equipped with an understanding of risk, resilience and personal strategies to keep themselves safe online.

4. Our online safety policy should be read in conjunction with the following policies, procedures and guidance notes: safeguarding policy and procedure; bullying and harassment policy (young people); IT acceptable use policy; behaviour management and young person code of conduct ;); staff code of conduct; and staff social media policy.

## Scope

5. This policy covers:

    - Anyone logging into any network, service, website or portal associated with The Inspire and Achieve Foundation.
    - Connecting a device via The Inspire and Achieve network.
    - Any electronic communication with an IAF young person, member of Staff or contractor.
    - From any geographic location both on site and off site

## Definitions

6. In setting out the definitions related to online safety the IAF uses the 4 Cs outlines within keeping children safe in education which have been incorporated into IAF's safeguarding processes and procedures:

    - **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,

- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, young people or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

## Responsibilities

7. **All staff are responsible for ensuring the safety of young people online and for ensuring their own conduct is appropriate and does not put young people at risk of harm.**

8. **All staff are responsible for reporting any concerns about young people to the safeguarding team in line with the IAF's procedures;**

9. **The designated safeguarding lead is responsible for ensuring that appropriate training is provided to all staff in relation to online safety and that appropriate action is taken to safeguard young people when concerns arise;**

10. **The QTLP and Teaching Delivery Manager is responsible for ensuring young people have appropriate and meaningful training/information around online safety;**

11. **Quality and Compliance Manager & Chair of Board** are responsible for ensuring appropriate and effective filtering and monitoring systems are in place;

12. **All young people are responsible for ensuring their own conduct does not put others at risk or harm and for reporting any concerns they may have about online safety.**

## Monitoring

13. IAF actively monitor, log and report on young people and staff use of IT systems and IT network usage as part of our safeguarding and prevent duties. This includes the use of filtering systems.

14. An attempt to interfere or avoid the monitoring or logging of any IT systems will be referred to the IAF's disciplinary process. Where requested this information will be securely shared with appropriate local authorities and external support agencies.

## Training

15. young people will be provided with online safety guidance at induction, this includes the proper use of IAF systems. Delivery programmes such as King's Trust and Alternative Provision will include appropriate and relevant online guidance for young people. IAF will also ensure young people consider their digital footprint in both a personal and professional context.

16. Issues associated with online safety apply across IAF and young people should receive guidance on what precautions and safeguards are appropriate when making use of the internet and mobile technologies. Young people should also know what to do and who to talk to where they have concerns about inappropriate content, either where that material is directed to them, or where it is discovered as part of a random search. Within classes, young people will be encouraged to question the validity and reliability of materials researched, viewed or downloaded. They will also be encouraged to respect the copyright of other parties and to cite references properly.

17. Staff will receive an introductory session for digital learning/working systems and environments within the induction period. This introductory session will signpost appropriate policies and procedures. Any new or temporary users will also be asked to sign IAF's IT acceptable use policy.

## Behaviour

18. Communications by staff and young people should be courteous and respectful at all times whether offline or online. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with the Anti-Bullying and Harassment processes (staff and students).

19. Cyber bullying is a form of bullying. As it takes place online, it is not confined to IAF venues or working hours. Cyber bullies can communicate their messages to a wide audience with speed and often remain anonymous or unidentifiable.

20. Cyber bullying includes bullying via:

    - Text message and messaging apps e.g. sending unwelcome texts or messages that are threatening or cause distress.
    - Picture/video-clips e.g. using mobile device cameras to bully someone, with images usually sent to other people, social media sites/apps or websites.
    - Phone call e.g. silent calls or abusive messages. The bully often disguises their number.
    - Email e.g. emailing upsetting messages, often using a different name for anonymity or using someone else's name to deflect the blame on them.
    - Chat room e.g. sending upsetting responses to people when they are in a web-based chat room.
    - Instant Messaging (IM) e.g. sending unpleasant messages in real-time conversations online.
    - Websites e.g. insulting blogs, personal websites, social networking sites and online personal polling sites.

21. Where conduct is found to be unacceptable, IAF will deal with the matter internally and refer to relevant policies such as the staff and young person code of conduct and disciplinary procedures. Where conduct is considered illegal, IAF will report the matter to the police.

## Online Communication

22. The bullet points below offer some guidance for both young people and staff in their online communications:

- Do not create, store, exchange, display, print or circulate any message or media which may cause offense to others.
- Do not post or circulate any message which may be considered harassment
- Do not send messages at random or excessively, also referred to as "spamming", consider carefully the reply all function in email.
- Staff should not use personal social media accounts as a method of communicating with young people.
- Staff should not give personal contact details to young people.
- Young person contact details must never be stored on a staff members' personal device(s), including computers, laptops, mobile phones, tablets, personal cloud or personal storage devices.
- IAF devices may, on occasion, be used to gather either video or photographic evidence in order to support young people' course requirements provided that the IAF hold a signed authorisation form for the young person in question.
- Do not give out log on details and passwords to anyone, IAF will never ask you to disclose your password.
- Do not open files or emails from people you do not know. They may contain viruses or offensive material.
- If you see something abusive or upsetting online, you report it to a member of staff and/or the safeguarding team.
- Do not save your log-on details on shared computers as some people may use your name to cause harm to others.
- Make sure that your computer is locked when not in use so that others cannot act inappropriately using your profile.
- Do not post any confidential information to any online platform.
- Young people should not send friend requests to members of staff, they are unable to accept them. Similarly staff should not seek to add young people as friends on their personal social media accounts. Social media presences established in the interests of teaching and learning must be established in line with the IAF's social media policy.

## Feedback and review

23. Staff and young people are actively encouraged to review and feedback on this policy document. This is a working document and as such changes can be made throughout the year, the policy will be next formally reviewed and re-approved in 2027.

Appendix 4

# Responding to concerns about staff

# Guidance and procedures

**Introduction**

IAF sets out it expectations related to staff behaviour within its code of conduct. This includes all colleagues' responsibility for creating a safe, secure and trusting environment for our young people where safeguarding is an integral part of our culture. This culture takes account of our responsibilities under Keeping Children Safe in Education (KCSiE). Our safeguarding procedures and employee code of conduct ensure that colleagues behave in a way that maintains public confidence in their ability to safeguard the welfare and best interests of our young people.

**Our role as a member of staff**

As a charity with young people under the age of 18, all staff at IAF are deemed to be in a 'position of trust'. It is a criminal offence for anyone in a position of trust to engage in a sexual relationship or grooming for such a relationship with a child under the age of 18. Concerns about the abuse of a position of trust should be reported immediately to the senior designated safeguarding lead (DSL), Jaye Crew, who will seek advice from the Local Authority Designated Officer (LADO). Such instances are likely to be managed through local authority managing allegations processes and reported to the police.

Whilst concerns about inappropriate relationships with young people over the age of 18 may not trigger a referral to the LADO or police, they will still be fully investigated by IAF and may result in disciplinary proceedings. If founded, IAF would deem such relationships to be gross misconduct.

**Concerns that meet the harm threshold**

Keeping children safe in education outlines instances where concerns about colleagues would meet the harm threshold, these concerns are where colleagues have:

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

For the avoidance of doubt a child is defined as anyone under the age of 18.

The last bullet point includes behaviour that may have happened outside of IAF that might make an individual unsuitable to work with children, this is known as transferable risk.

In all cases where the DSL judges that a concern about a staff member meets the harm threshold, issues will be escalated to the LADO. Next steps both in terms of escalation to the managing allegations process or any investigation by the IAF will be guided by the LADO and may result in IAF invoking its disciplinary processes. Where allegations are substantiated this may result in dismissal and referral to the DBS service. It is worth noting that a substantiated allegation through

the managing allegations process does not automatically result in dismissal, IAF through its own investigation, would consider risk and how such risk can be mitigated to enable it to discharge its duty to keep children safe. In all cases where concerns have been substantiated through the managing allegations process, the DSL will act as investigating manager within IAF's disciplinary processes.

Concerns related to the DSL should be escalated to IAF Director Pippa Carter who will refer to the LADO, however, colleagues can make contact with the LADO directly.

**Low level concerns**

IAF encourages and promotes a culture whereby staff feel enabled to report concerns about a colleague's conduct and have confidence that those concerns will be taken seriously. **All** concerns whether or not they meet the harm threshold will therefore be recorded to enable IAF to build a picture of suitability over time.

Low level concerns are those that do not meet the harm threshold. It does not mean that these concerns are not significant, a low level concern is **any** concern, no matter how small, and even if no more than a 'nagging doubt', that an adult working on behalf of IAF may have acted in a way that is inconsistent with the staff code of conduct, examples can include but are not limited to:

- Being over friendly with young people;
- Having favourites;
- Taking photographs of young people on their personal mobile phones;
- Engaging with a young person on a 1:1 basis, behind closed doors or in a secluded area; and/or
- Using inappropriate, intimidating, offensive or overly sexualised language.

Such behaviour exists on a spectrum from inadvertent/thoughtless or behaviour that may look to be inappropriate but may not be in the specific circumstances through to what is ultimately intended to enable abuse. It is important therefore that concerns are shared with the DSL who will make a judgement about seriousness and where necessary seek advice from the LADO. Concerns raised about contractors and supply staff will be shared with the individual's employer and may be escalated to the LADO.

Low level concerns will be recorded in a confidential spreadsheet by the Senior Leadership Team. Where necessary appropriate advice and guidance will be given to staff members in respect of how they behaviour may be interpreted by others and support offered to enable colleagues to perform their duties in line with IAF's code of conduct. The advice given and by whom will be recorded confidentially.

Low level concerns will be reviewed on a quarterly basis by the DSL and deputy DSL and reported to the Director. This enables the DSL and Director to identify concerning patterns of behaviour which may need to be escalated through IAF disciplinary processes or escalated to the LADO. This action will be recorded.

Low level concerns will **not** be referred to in references unless they have been escalated through formal disciplinary procedures or escalated to the LADO.

Whenever staff leave IAF, consideration will be given as to whether or not that information needs to be kept. In making this consideration IAF will make a judgement about whether any or all of the

information contained may have any reasonable value in terms of historic employment or abuse claims. Where this is not the case records will be destroyed/deleted.

**Legitimate relationships with young people**

IAF recognises that due to the age group of young people colleagues may have legitimate relationships with young people (e.g. parent, friend, partner, and spouse). Such relationships should be logged with senior management team in the interests of protecting the individual from unfounded allegations.

**Further information and guidance**

Can be sought from the senior DSL. Staff should refer to the employee code of conduct, safeguarding procedures and Keeping Children Safe in Education for further information.

**Flowchart for managing concerns about staff.**

Concerns related to the conduct of staff should be reported to the Senior DSL (Jaye Crew)

Concerns related to the conduct of the Senior Leadership Team should be reported to the IAF Director Pippa Carter. Concerns related to the conduct of the Director should be reported to the Chair of the Board of Trustees Alex Peace-Gadsby

The DSL will consider - Does the concern indicate that the individual has acted in such a way as to cause harm to a child, to have committed a criminal offence that indicates they pose a risk of harm to a child or may be unsuitable to work with children? **The concern meets the harm threshold**

**Yes**

**No**

DSL to make contact with the LADO immediately and seek advice as to next steps. Where LADO refer to the managing allegations process, IAF will consider the need for suspension but will not instigate its own disciplinary processes until the managing allegations process has concluded.

**No**

No further action will be taken

The DSL will consider - does the concern indicate that conduct is inconsistent with the staff code of conduct – the concern is considered to be a **low level concern**

**Yes**

**Yes**

Low level concerns reviewed quarterly by DSL and Director, where concerning patterns of behaviour emerge consideration be given as to whether these meet the harm threshold

Concerns will be logged on a confidential system with the following information:

- Name of the individual
- Person raising the concern
- Details of the concern
- Context in which the concern arose
- Action taken to address the concern

Advice and guidance along with support will be provided to the individual to enable them to correct their conduct.

**Record review may indicate that there are systemic issues within IAF that enabled certain types of behaviour, policies, processes and guidance will be reviewed alongside the need for CPD to address issues**

Appendix 5:

Helpful information:

**Helplines and reporting**

- Children can talk to a ChildLine counsellor 24 hours a day about anything that is worrying them by calling 0800 11 11 or in an online chat at http://www.childline.org.uk/Talk/Chat/Pages/OnlineChat.aspx.
- If parents or carers are concerned that their child is being contacted by adults as a result of sharing sexual imagery they should report to NCA-CEOP at www.ceop.police.uk/safety-centre
- ChildLine and the Internet Watch Foundation have partnered to help children get sexual or naked images removed from the internet. Young person can get their photo removed by talking to a ChildLine counsellor. More information is available at http://www.childline.org.uk/explore/onlinesafety/pages/sexting.aspx
- If parents and carers are concerned about their child, they can contact the NSPCC Helpline by ringing 0808 800 5000, by emailing help@nspcc.org.uk, or by texting 88858. They can also ring the Online Safety Helpline by calling 0808 800 5002.

**Advice and information for parents**

- The NSPCC has information and advice about sexting available on its website: NSPCC advice on sharing nudes and semi-nudesNSPCC Sexting
- The National Crime Agency/CEOP has produced a film resource for parents and carers to help them prevent their children coming to harm through sharing sexual imagery: THINKUKNOW Nude-selfies-a-parents-guide
- Childnet have information and advice about sexting available on its website: http://www.childnet.com/young-people/secondary/hot-topics/sexting

**Resources parents could highlight to their children**

- ChildLine have created Zip-It, an app that provides witty comebacks in order to help young person say no to requests for naked images Childline Zipit Ap
- There is information for young people about making or sharing nudes and semi-nudes. Childline information for young people
- The Safer Internet Centre has produced resources called 'Childnet So you got naked online which help young people to handle incidents of sexting

**The NSPCC adults helpline: 0800 028 0285 The** NSPCC has partnered with O2 to offer direct support to parents and other adults on issues relating to online safety.

**ChildLine**: www.childline.org.uk ChildLine offers direct support to children and young people including issues relating to the sharing of sexual imagery.

**The Professionals Online Safety Helpline (POSH):** http://www.saferinternet.org.uk/about/helpline Tel: 0844 381 4772. This helpline supports professionals with an online safety concern or an online safety concern for children in their care. Professionals are able to contact the helpline to resolve issues.

**Appendix 6 – definitions**

**Neglect, physical abuse, sexual abuse and emotional abuse.**

**Physical Abuse**

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

*May be recognised by: Children with frequent injuries, injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury.*

**Emotional Abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, for example, domestic abuse. 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.

*This may be recognised by: aggressive behaviour, appeasing behaviour, watchfulness or stillness, low self-esteem, withdrawn or a loner, or having difficulty in forming relationships. Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.*

**Sexual Abuse**

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

*This may be recognised by: Inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports / PE etc., pain or itching in genital area, blood on underclothes, bruising in genital region and / or inner thighs etc.*

**Neglect**

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 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.

*This may be recognised by: Being constantly hungry; constantly tired; have a poor state of clothing; be emaciated; have untreated medical problems; be frequently late or have poor or non-attendance at IAF; have low self-esteem; display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive, or be left with or in the care of adults under the influence of alcohol or drug misuse*

**Children with Special Educational Needs**

Children with special educational needs (SEN) and or disabilities can face additional safeguarding challenges. Children with SEN and or disabilities are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. They may also sometimes not be believed because of their special educational needs or disabilities. We can never allow this to happen.

Additional barriers can therefore exist when recognising abuse and neglect in this group of children which include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

**Racist, disability, homophobic, biphobic or transphobic abuse**

Abuse of any form on the basis of any of these will not be tolerated; staff and volunteers need to be alert to link between differing types of abuse and behaviours, for example racism and extremist behaviour, particular in our region.

Staff need to be aware of what they need to do if they are concerned this is happening (i.e. complete a part one form) and what support will need to be put in place.

**Appendix 7: Further information (taken directly from Keeping Children Safe in Education)**

**Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

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

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

**Children and the court system**

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

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online https://helpwithchildarrangements.service.justice.gov.uk/ with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

**Children who are absent from education, including repeated or prolonged absence, should be considered as potentially vulnerable. IAF will maintain appropriate contact, record safeguarding actions and share relevant information with commissioning and statutory services where concerns arise.**

All staff must be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff must be aware of their school's or IAF's unauthorised absence and children missing from education procedures.

**Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to

support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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

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

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

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

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

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

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners and Preventing Child Sexual Exploitation

**County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen

locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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

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

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf .

**Modern Slavery and the National Referral Mechanism**

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

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

**Cybercrime**

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

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

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

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

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

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices https://www.ncsc.gov.uk/ or https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf

**Domestic abuse**

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

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

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

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of

'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

**Operation Encompass**

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

**National Domestic Abuse Helpline**

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

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

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

**Homelessness**

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

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and

work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

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

**Honour, faith or belief-based abuse (including female genital mutilation and forced marriage)**

**Actions**

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

**FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

It will be rare for teachers to see visual evidence, they should not be examining pupils or young people, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or IAF's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or

over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

**Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at  School and IAF staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email .The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk).fmu@fcdo.gov.uk

**Preventing radicalisation**

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

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

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

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

**The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard133 to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

**Channel**

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

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

Additional support

The Department has published further advice for schools on the Prevent duty.

The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their young people from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation. For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the

Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

**Child-on-child abuse (including harassment and violence)**

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It can happen both inside and outside of school/IAF and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

**Sexual violence and sexual harassment between children in schools and colleges**

**Context**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or IAF. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

Dismissing or tolerating such behaviours risks normalising them and may contribute to a culture in which misogyny, sexual harassment or other harmful behaviour escalates.

**What is sexual violence and sexual harassment?**

**Sexual violence**

It is important that school and IAF staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/IAF. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

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

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**What is consent**?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.137

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

**Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/IAF. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
- sharing of unwanted explicit content;
- upskirting (is a criminal offence141);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

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

**The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is incredibly important. How the school or IAF responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Appendix 8

# Safeguarding Policy Statement

## Introduction, Scope and Purpose

1. Safeguarding is an all-encompassing term used to describe many aspects of keeping our young people safe, which includes:

    - young person health, safety and wellbeing
    - Child protection
    - Protection of adults at risk
    - Bullying, harassment and discrimination including racial abuse
    - Self-harm
    - Child-on-child abuse (including harassment and violence)
    - Abuse and neglect
    - Domestic violence
    - Safety from sexual exploitation, criminal exploitation, female genital mutilation and forced marriage
    - Criminal exploitation and county lines
    - Alcohol, drug and substance misuse
    - E-safety including all aspects of electronic communication
    - Financial exploitation
    - Protecting people from radicalisation and extremism
    - The security and safety of IAF venues

2. The policy covers all IAF young people whether they are based at an IAF venue, on a visit, at a work placement or in workplace learning; it covers all aspects of a young person's programme regardless of where it takes place. It is the responsibility of all staff to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document.

## Key Principles

3. IAF will operate within the following key principles when it relates to safeguarding:

    - All people will be treated with respect and with courtesy by staff and young people in an environment that is free from harassment or discrimination.
    - All training rooms, communal areas, facilities and equipment will comply with legislative health and safety standards.
    - IAF will work with young people and other agencies to promote a safe and healthy culture.
    - IAF will develop partnerships to proactively protect young people at risk of abuse, neglect or at risk of radicalisation.
    - IAF will have procedures in place to identify and respond to those young people who might benefit from early help, recognising that the earlier help is in place the more effective it is for the individual.

- Staff will be trained and will have a clear understanding of personal safety and good safeguarding practices as well as what factors may make young people vulnerable to a range of safeguarding concerns.
- IAF will work with young people to promote their own personal health, well-being and safety including their safety online.
- IAF will work proactively to raise awareness of radicalisation and extremism in order to prevent people from being drawn into terrorism.
- young people will receive confidential advice, guidance and support for a range of issues that they may face. They will be signposted to external agencies where specialist support is required.

IAF will support young people to have personal resilience and be able to make informed and sensible decisions about their safety and wellbeing in an attempt to prevent them from being exploited and or abused.

## Young people' Entitlement

4. In order to promote a healthy and a safe environment, our young people will be entitled to the following:

    - The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly, sensitively and appropriately.
    - To learn in an environment free from bullying or harassment.
    - To be made aware of strategies and actions that to keep themselves safe whether in IAF, outside IAF or online.
    - To be made aware of the basic principles of safe learning and safeguarding relevant to the programme that the young person is completing.
    - To be made aware of how to access support on personal health and safety issues either within IAF or from outside agencies.
    - To be provided with up to date information around personal safety issues.
    - The opportunity to comment and feedback on the extent to which IAF and courses promote and maintain well-being and personal safety.
    - Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment.

## Strands of Activity

5. The safeguarding efforts of IAF are supported by the following core strands of activity, where relevant, working procedures and other policy documents have been signposted within this section.

    **Safe learning**

6. The principles of the 'Keeping children safe in education' and safeguarding agendas will be embedded within IAF's teaching and learning practices and within the IAF's quality assurance and quality improvement frameworks. Safe recruitment practices will be implemented as outlined in the relevant section of this policy.

7. IAF is committed to engaging young people on issues related to financial health, mental health and physical health – in order to improve their quality of life. The aim is to provide young people with the tools to make healthy and safe decisions.

**Safe environment**

8. IAF will provide an environment that is safe and secure for all users, whilst at the same time is friendly and welcoming. Robust systems and processes will be in place for staff and young person identification and for visitor registration. A culture of respect that is free from bullying and harassment will be engendered. Health and safety is of paramount importance and must never be compromised or short cut; as such all facilities and resources will comply with legislative requirements for health and safety.

9. IAF's commitment to the safe environment is enshrined within the following policy and procedure documents: the health and safety policy and manual; the IT acceptable use policy for young people and the incident reporting procedures.

**Safe recruitment**

10. IAF will comply with best practice in the recruitment and training of its staff, in line with legislative requirements. Staff will undergo the appropriate pre-employment checks including DBS checks for their role where applicable, and undertake mandatory safeguarding training appropriate to their role. Staff will understand the Code of Conduct, and how not to put themselves in situations that compromise themselves or young people. All new starters will receive an appropriate induction, including safeguarding training.

**Safeguarding young people**

11. IAF has a legal obligation to protect young people and vulnerable adults from abuse. IAF has an appropriately trained DSL and other staff that form a 'safeguarding team' who will ensure that disclosures made by young people are dealt with quickly, sensitively and appropriately. All staff will be trained in the appropriate response to a young person disclosure and the correct procedure for dealing with concerns about a young person. Teams will work with young people to proactively protect them from abuse and neglect and prevent young people being placed in an abusive situation.

12. IAF's commitment to the protection of young people and vulnerable adults is enshrined within the Safeguarding Procedure.

**Preventing people from being drawn into terrorism**

14. IAF has certain duties enshrined within the Counter Terrorism and Security Act 2015. All staff are aware of their Prevent duties and IAF has robust processes in place to respond to concerns about young people and staff members. The Prince's Trust Team programme enables young people to explore and discuss issues in a safe and open environment.

15. IAF's commitment to *Prevent* is encapsulated within the *Prevent* policy, risk assessment and action plan and has been incorporated into the IT acceptable use policy and safeguarding procedures.

**Links with external agencies**

18. IAF works with Local Safeguarding Children Partnership, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub and other professionals to ensure a comprehensive safeguarding network is in place. Advice will be taken from professionals within these organisations as appropriate.

19. IAF will work proactively with the regional Prevent coordinators and where appropriate the local steering group and Channel panel.

## Key Responsibilities

**The Board of Trustees** – will have overall responsibility for ensuring that IAF meets its obligations within this area. They will be responsible for the approval of relevant safeguarding policy.

**The DSL** – will be the QTLP and Teaching Delivery Manager. They will be responsible for ensuring that the safeguarding processes and procedures are robust and consistently applied and that IAF fulfils its legal duties as enshrined within legislation. They will be the first point of contact for complaints made against staff and will liaise with the Local Area Designated Officer on all such matters.

**The Director**– is responsible for ensuring that safe recruitment practice is embedded and implemented across IAF, that the single central record is accurately maintained and that all staff have received appropriate training and development.

**The IAF Senior Management Team** – will be responsible for ensuring that all staff have an understanding of safeguarding and have received appropriate training and development and that the staff recruitment and selection procedure is followed at all times. They will ensure that safeguarding is given high priority within their teams.

**All employees - will have a responsibility for completing their training, familiarising themselves with Keeping children safe in education: safeguarding information for all staff the Safeguarding Procedure, the Prevent Policy and any other related safeguarding policies and procedures. They are also responsible for ensuring they understand their own role in the promotion of safeguarding and the appropriate action to be taken should they receive a disclosure or have concerns about a young person.**