

## CHILD AND VULNERABLE ADULT PROTECTION AND SAFEGUARDING POLICY

### KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer</b>	See Annex A – List of Local Authority Designated Officers
<b>Local Authority Children’s Social Services</b>	See Annex B – List of Local Authority Children’s Social Services
<b>Multi-Agency Safeguarding Hub</b>	See Annex C – List of Multi-Agency Safeguarding Hubs
<b>Support and Advice about Extremism</b>	<p><b>Police</b> EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 PREVENT ADVICE LINE 0800 011 3764 ANTI-TERROR HOTLINE 0800 789 321 ONLINE: <a href="http://met.police.uk">met.police.uk</a></p> <p><b>Local Authority</b> See Annex C – List of Multi-Agency Safeguarding Hubs</p> <p><b>Department for Education</b> Jennie Fisher (<i>She / Her pronouns</i>) FE/HE Regional Prevent Co-Ordinator for London MOBILE: 07880 469 588 EMAIL: <a href="mailto:Jennie.FISHER@education.gov.uk">Jennie.FISHER@education.gov.uk</a> NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></p>
<b>NSPCC Whistleblowing Advice Line</b>	<p>ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>NSPCC Report Abuse in Education Advice Line</b>	<p>TEL: 0800 136 663 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>Disclosure and Barring Service</b>	<p>ADDRESS: DBS customer services PO Box 3961</p>

	<p>Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk</p>
<b>Teaching Regulation Agency</b>	<p>ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<b>OFSTED Safeguarding Children</b>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a></p>

#### KEY INTERNAL CONTACT DETAILS

<p><b>Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Lead ("DDSL")</b></p>	<p><b>Main DSL for the Company</b> Steven Mitchell (Director of Improvement and Development) - M: 07860 695386</p> <p><b>Deputy DSLs</b> For learners on Study and Traineeship programmes, the appointed DDSL is <b>Joanne Heywood</b> - M: 07792 785531</p> <p>For learners on Adult Education programmes, the appointed DDSL is <b>Alison Wood-Still</b> - M: 07880 461049</p> <p>For learners on Apprenticeship programmes, the appointed DDSL is <b>Rob Bastow</b> - M: 07792764867</p> <p>In the event that none of the above are available or on leave, please contact DDSL, <b>Michelle Allen</b> – M: 07584 381199</p> <p><b><u>Notices of concern should be raised through the Solution 9 platform</u></b> which allows for tracking</p>
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	<p>of each case through our network of Safeguarding Leads.</p> <p>Where the request is external (for example a learner or employer raising a concern) emails should be sent to the <a href="mailto:safeguarding@skillstraininguk.com">safeguarding@skillstraininguk.com</a> email address providing a brief description of the concern. This will be followed up by the relevant Safeguarding Lead above with an expected initial response within 48 hours.</p>
<p><b>Designated Teacher for Looked After Children</b></p>	<p>Kuljit Guron Learning Support Specialist <a href="mailto:kuljitguron@skillstraininguk.com">kuljitguron@skillstraininguk.com</a></p>

## POLICY STATEMENT

This policy applies to Skills Training UK ("the Company"). This policy is reviewed and updated annually (as a minimum) and is available on the Company's website.

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2022) ("*KCSIE*")
  - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)*
  - *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (dated 2018 but updated 2020) ("*WT*")
  - *WT refers to the non-statutory advice: Information sharing (July 2018)*
- *Prevent Duty Guidance: for England and Wales* (April 2021) ("*Prevent*"). *Prevent* is supplemented by non-statutory advice and a briefing note:
  - *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
  - *The use of social media for on-line radicalisation* (July 2015)

This policy also considers the procedures and practice of London Borough of Brent (as our lead Local Authority from a contractual point) as part of the inter-agency safeguarding procedures set up by the London Borough of Brent Safeguarding Children Executive.

## CONCERNS ABOUT A CHILD/VULNERABLE ADULT

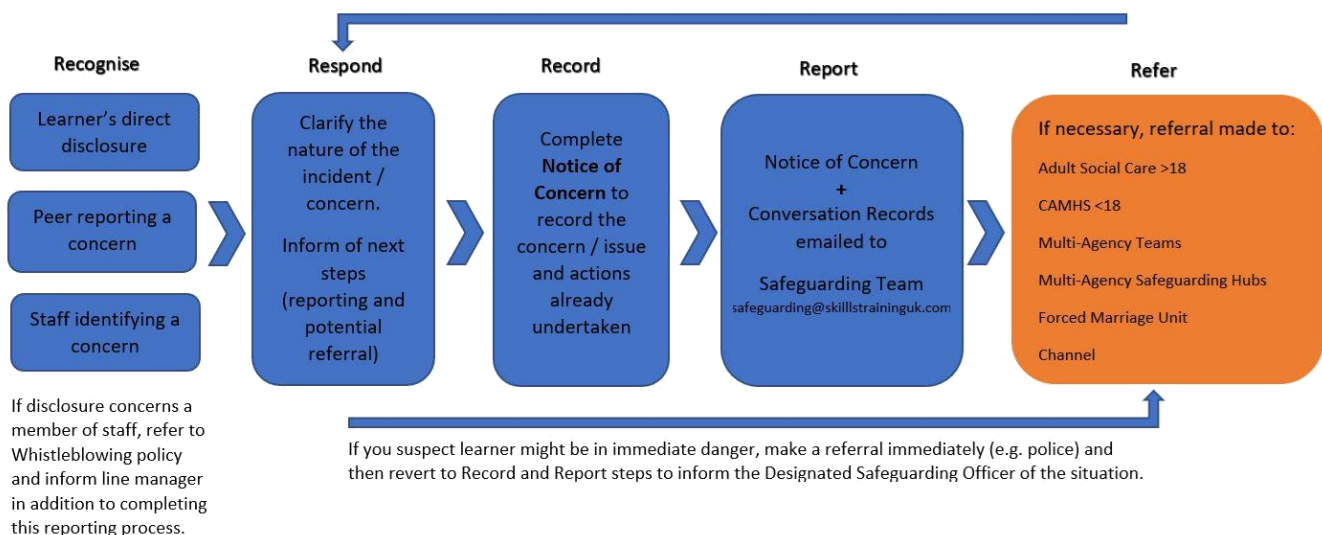
**A child is defined as anyone under the age of 18. A vulnerable adult is defined as any person over the age of 18 and:**

- **Is receiving any form of health care;**
- **Is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care; or**
- **Has age-related needs include needs associated with frailty, illness, disability, or mental capacity.**

The majority of learners that the Company comes into contact with through the Department for Education (DFE) and Mayoral Combined Authorities (MCA) contracts will either fit into these categories or be family members of individuals who also fit into these categories.

Skills Training UK has a duty to consider at all times the best interests of the learner and take action to enable all learners to achieve the best outcomes. Safeguarding and promoting the welfare of children/vulnerable adults is everyone's responsibility. Skills Training's whole

Feedback Loop. Additional information might be requested by an external organisation or by the Designated Safeguarding Officer to complete a referral.



company' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Skills Training UK has arrangements for listening to children/vulnerable adults and providing early help. Our Delivery Centres have a trained Safeguarding Lead at each centre who can provide specialist support.

### **What should you do if you identify suspected abuse?**

#### **Definitions of safeguarding and types and signs of abuse**

Safeguarding and promoting the welfare of children/vulnerable adults is defined as protecting children/vulnerable adults from maltreatment; preventing impairment of children/vulnerable

adults' 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/vulnerable adults to have the best outcomes.

Abuse is a form of maltreatment of a child/vulnerable adult. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm or by failing to act to prevent harm. Children/vulnerable adults may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- Physical abuse;
- Emotional abuse;
- Sexual abuse; and/or
- Neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

## **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD/VULNERABLE ADULT**

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child/vulnerable adult or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children/vulnerable adults safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The Executive Board, through Senior Leadership Team, recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the Company and with Local Authority children's/adult social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children/vulnerable adults, and neither the DPA 2018 nor the UK GDPR prevent the sharing of information for the purposes of keeping children/vulnerable adult safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

The Executive Board, through the Senior Leadership Team, will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as ‘special category personal data’
- Understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child/vulnerable adult at risk
- Not providing learners’ personal data where the serious harm test is met.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, the Company will ensure the learner’s wishes and feelings are considered when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. Skills Training UK manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for learners to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the Company and can occur between learners outside the classroom. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. Skills Training UK will as part of the wider assessment of children/vulnerable adults, consider whether environmental factors are present in a learner’s life that are a threat to their safety and/or welfare. Skills Training UK as much information with Children’s/Adult Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **Early Help**

Any child/vulnerable adult at risk may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child/vulnerable adult who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether they have a statutory Education, Health and Care Plan)
- Has a mental health need
- Is a young carer
- 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 care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child/vulnerable adult, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education

Early help means providing support as soon as a problem emerges at any point in a child/vulnerable adult's life.

In the first instance, staff who consider that a learner may benefit from early help should discuss this with the Company's DSL. The DSL will consider the appropriate action to take in accordance with the guidelines provided by the relevant Multi-Agency Safeguarding Hub in each Local Authority region which will include Safeguarding Children Executive, Local Authority, Clinical Commissioning Group, and Police representation. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's/adult social care if the learner's situation does not appear to be improving.

### **What staff should do if they have concerns about a child/vulnerable adult**

If staff (including supply staff, agency staff and volunteers) have any concerns about a child/vulnerable adult (as opposed to a child/vulnerable adult being in immediate danger), they should, where possible, speak with the Company's DSL to agree a course of action, although staff can make a direct referral to children's/adult social care. As set out above, staff should



not assume that somebody else will act and share information that might be critical in keeping children/vulnerable adults safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child/vulnerable adult's situation does not appear to be improving, the DSL should press children's/adult social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's/adult social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### **What staff should do if a child/ vulnerable adult is in danger or at risk of harm**

If staff (including supply staff, agency staff and volunteers) believe that a child/vulnerable adult is in immediate danger or at risk of harm, they should make an immediate referral to children's/adult social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's/adult social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The Local Authority social worker should acknowledge receipt to the referrer within 24 hours and determine the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's/adult social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Skills Training UK delivers education and skills services nationally in accordance with the guidelines provided by the relevant Multi-Agency Safeguarding Hub in each Local Authority region which will include Safeguarding Children Executive, Local Authority, Clinical Commissioning Group, and Police representation. . A full copy of processes and procedures can be found on the Skills Training UK intranet.

### **What staff should do if a child/vulnerable adult is seen as at risk of radicalisation**

Staff should follow the Company's normal referral processes when there are concerns about children/vulnerable adults who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's/adult social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child/vulnerable adult being drawn into terrorism they must call 999. Advice and support can also be sought from children's/adult social care.

Skills Training UK, in recognition that learners may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the relevant local area. Such risk assessments are discussed with the DSL and DDSLs to ensure the Company's safeguarding arrangements are sufficiently robust to help prevent and protect children/vulnerable adults from being drawn into terrorism and are regularly revised.



### **What staff should do if they discover an act of Female Genital Mutilation ("FGM")**

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's/adult social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a learner may be at risk of FGM.

### **What staff should do if they have concerns that children/vulnerable adults are at risk from or involved with serious violent crime**

All staff should be aware of indicators which may signal that children/vulnerable adults are at risk from or are involved with serious violent crime. These may include increased absence from classes, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child/vulnerable adult (as opposed to a child/vulnerable adult being in immediate danger), they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to children's/adult social care.

### **How should staff respond to an incident of nudes and semi-nudes being shared by learners**

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a learner or of a learner, they should refer the incident to the DSL as soon as possible.

The DSL will follow the UK Council for Internet Safety guidance "[Sharing nudes and semi-nudes: advice for education settings working with children and young people](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)"<sup>1</sup> (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the learner unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's/adult social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled internally in accordance with the "sharing nudes" guidance and the Company's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's/adult social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Skills Training UK will record the reason for not reporting incidents externally and ensure it is signed off by the DSL. Records will be kept in line with statutory requirements set out in *KCS/E* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

### **What staff should do if a child/vulnerable adult goes missing from education**

Children/vulnerable adults who go missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the Company's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. Skills Training UK's procedures for unauthorised absence and for dealing with learners who go missing from education are detailed in our Attendance Policy. For students aged 16-19 (or up to the age of 25 with an Education Health and Care Plan) we

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<sup>1</sup> <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

will inform the relevant Local Authority immediately of any absence from learning. [●Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the Company will hold more than one emergency contact number for each learner to provide the Company with additional options to make contact with a responsible adult particularly when a child/vulnerable adult missing from education is also identified as a welfare and/or safeguarding concern.

### **What staff should do if a child/vulnerable adult needs a social worker**

Children/vulnerable adults may need a social worker due to safeguarding or welfare needs. Children/vulnerable adults may need this help due to abuse, neglect and complex family circumstances. A child/vulnerable adult's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child/vulnerable adult has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child/vulnerable adult's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children/vulnerable adults need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **What staff should do if a child/vulnerable adult requires mental health support**

Skills Training UK has an important role to play in supporting the mental health and wellbeing of its learners. Mental health problems can, in some cases, be an indicator that a child/vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. Skills Training UK prevent health problems by promoting resilience as part of a whole company approach to social and emotional wellbeing of our learners. All Centres have a Mentor onsite who can provide support and coaching, as well as signposting to relevant agencies where appropriate.

Staff can access a range of advice to help them identify children/vulnerable adults in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support teachers to promote positive health, wellbeing, and resilience among young people.

### **What staff should do if they have safeguarding concerns about another staff member**

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers, and contractors), then this should be referred to the DSL. Where there are concerns about the DSL, this should be referred to the DDSLs. In the event of allegations of abuse being made against the DSL, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at the relevant Local Authority.

### **What staff should do if they have concerns about safeguarding practices at the Company**

Skills Training UK aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the Company's safeguarding systems, these should be raised in accordance with the Company's whistleblowing procedures which can be found in the Employee Handbook (on SharePoint). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the Company or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

### **ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)**

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of the classroom, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in the classroom or outside of it, and/or online. Abuse that occurs online or outside of the classroom should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Skills Training UK takes a

zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are 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.

Skills Training UK acknowledges that even if there have been no reported cases of child-on-child abuse in relation to learners within the classroom or online, such abuse may still be taking place and is simply not being reported. Skills Training UK e that children are aware of how they can report abuse, and that they are aware of the procedures that the Company will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

Skills Training UK recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the learner is likely to feel that the member of staff is in a position of trust. Skills Training UK nises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the Company's policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

Skills Training UK recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

Skills Training UK recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. Skills Training UK der extra pastoral support for those children through our network of on-site mentors and Learning Support Specialist/SEN support. The Company also recognises certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

It is important to recognise that abuse is not always perpetrated by adults; children can abuse other children and it can happen both inside and outside of educational settings and online. This is referred to as 'child-on-child abuse' (formally known as peer-on-peer abuse). Skills Training UK takes the following steps to minimise the risk of child-on-child abuse.

- All staff are appropriately trained to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports in line with this policy.
- All staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “banter” or “part of growing up” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- Where an issue of learner behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, harm,’ staff should follow the procedures below.

A learner against whom an allegation of abuse has been made may be suspended from the classroom during the investigation. Skills Training UK will take advice from the DSL/DDSL who may also refer back to the relevant Local Authority, Clinical Commissioning Group, and Police force on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all learners involved including the alleged victim and perpetrator(s). If it is necessary for a learner to be interviewed by the police in relation to allegations of abuse, the Company will ensure that, subject to the advice of the relevant Local Authority, Clinical Commissioning Group, and Police force, parents are informed as soon as possible and that the learners involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the Company and advice will be sought as necessary from the relevant Local Authority, Clinical Commissioning Group, and/ or the police as appropriate. Skills Training UK regard to the procedures set out in *KCSIE* at all times.

The victim may ask the Company not to tell anyone about sexual violence or sexual harassment. Advice should be sought from the DSL or DDSLs who should consider parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Local Authority children’s social care; and whether a crime has been committed. Ultimately the DSL or DDSLs will balance the victim’s wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts, and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the Company will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children’s social care and/or a report to the police against a victim’s wishes, the reasons should be explained to the learner and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and



may make the necessary referral to the Multi Agency Safeguarding Hub and/or external bodies as required.

Skills Training UK's approach to sexting is as follows: The use or distribution of images, text/information, or videos will be carefully scrutinised and monitored by Tutors, Trainer Assessors, and all education providers for the Company. Learners are made aware of their responsibilities during induction and an IT (Information Technology) Acceptable Use poster is available in all classrooms where IT facilities are available which outlines clearly what is deemed acceptable and unacceptable practice. The Acceptable Use of IT agreement is automatically displayed on logging into all Company machines. Learners are required to agree and adhere to this policy in order to be able to use the computer facilities. Learners are provided with access to the IT Usage Policy via the Learner Portal.

Skills Training UK will follow the UK Council for Internet Safety guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that intimate photos have been shared.

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported, which includes referral to and support from external agencies as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- The victim;
- Whether there may have been other victims;
- The alleged perpetrator(s); and
- All the other children (and, if appropriate, staff) at the Company especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. Skills Training UK will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. Skills Training UK will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The Company acknowledges by the very nature of sexual violence and sexual harassment, a power imbalance is likely to



have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to learners and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes and communal space (for example kitchens and breakout rooms at each of our centres). The Company will also consider to the impact to the victim from other health needs, including physical, mental, and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

Skills Training UK will consider intra familial harms and whether any support for siblings is necessary following an incident.

Skills Training UK will keep a written record of all concerns, discussions and decisions made.

Skills Training UK will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the Company's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the Company will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded, or malicious, the DSL will consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Company will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the Company's Behaviour Policy.

## DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRATORS

Skills Training UK's procedures for managing concerns or allegations against staff (including supply staff, volunteers, and contractors) who are currently working in the Company whether in a paid or unpaid capacity follows DfE statutory guidance and relevant Local Authority, Clinical Commissioning Group, and Police force] arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child/vulnerable adult, or may have harmed a child/vulnerable adult; and/or
- Possibly committed a criminal offence against or related to a child/vulnerable adult; and/or
- Behaved towards a child/children/vulnerable adult(s) in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children/vulnerable adults; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/vulnerable adults, including behaviour that may have happened outside of classroom.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the Company's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO (Local Authority Designated Officer). Non-recent allegations made by a child/vulnerable adult will be reported to the LADO in line with the Local Authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children/adult social care and the police.

If an allegation is made against anyone working with children/vulnerable adults in the Company, before contacting the LADO, the Company will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. Skills Training UK should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the Company may discuss informally with the LADO on a no-names basis.

When dealing with an allegation about a staff member the Company will apply common sense and judgment, deal with allegations quickly, fairly, and consistently and will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the DSL. Where the DSL is absent or is the

subject of the allegation, reports should be made to the Chief Executive Officer. Where the DSL is the subject of the allegation, the DSL must not be informed of the allegation prior to contact with the Chief Executive Officer and LADO.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children/vulnerable adults or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's/adult social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren)/vulnerable adult(s) agreed. The DSL is responsible for ensuring the child/vulnerable adult is not at risk.
3. Where the case manager is concerned about the welfare of other children/vulnerable adults in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's/adult social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's/adult social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children/vulnerable adults in the classroom or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
  - Redeployment within the Company so that the individual does not have direct contact with the child/children/vulnerable adult(s) concerned;
  - Providing an assistant to be present when the individual has contact with children/vulnerable adults;
  - Redeploying to alternative work in the Company so the individual does not have unsupervised access to children/vulnerable adults;
  - Moving the child/children/vulnerable adult(s) to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child/children/vulnerable adult(s) concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,

- Temporarily redeploying the member of staff to another role in a different location.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child/children/vulnerable adult(s) enrolled with the Company is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the Company and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the Company to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the Company. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
7. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's/adult social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
9. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

10. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the Company ceases to use their services, or the person resigns or otherwise ceases to provide their services. Skills Training UK has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a learner) who has harmed, or poses a risk of harm, to a child/children/vulnerable adult(s), or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the Company must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
11. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the Company's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious, or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the Company will make a referral to the DBS (Disclosure and Barring Service).

Skills Training UK has a duty of care to its staff, and whilst the welfare of a child/vulnerable adult is paramount, the Company must offer appropriate welfare support to the adult subject to the investigation and potentially their family. Skills Training UK make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with learners or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Skills Training UK has an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded, or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL will consider whether the child/vulnerable adult and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's/adult social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Company will consider whether any disciplinary action is appropriate against a learner who made it in accordance with the Company's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a learner.

## **DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS**

Skills Training UK's procedures for managing allegations against staff above also apply to staff not directly employed by the Company, for example, supply teachers provided by an employment agency or business ('the agency'). Skills Training UK People Team will take the lead on investigation of any allegation related to staff, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's/adult social care.

In no circumstances will the Company decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Skills Training UK will discuss with the agency (or agencies where the supply teacher is working across a number of education settings) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the Company, whilst they carry out their investigation.

Skills Training UK will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information



sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the Company during the investigation.

When using an agency, the Company should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left the Company first, the Company must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)**

A low-level concern is any concern that an adult working in or on behalf of the Company may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

Skills Training UK takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the Company's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

If a staff member has concerns about their own or another member of staff's behaviour, they should speak to their line manager informally in the first instance in line with the Grievance Policy. The DSL is the ultimate decision-maker in respect of all low-level concerns.

Skills Training UK's code of conduct can be found in the Employee Handbook. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place learners or staff at risk of harm or of allegation of harm to a learner. All staff are expected to comply with the standards contained within this code of conduct at all times.



Staff must share all concerns with the DSL without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the DSL, it should be referred to the Chief Executive Officer.

Staff are also encouraged to self-refer if they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the DSL will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

Skills Training UK will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be always held securely and in compliance with the Data Protection Act 2018 and the UK GDPR. Low-level concerns will be retained securely by the Company for as long as deemed relevant and necessary for a safeguarding purpose unless the Company is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves the Company, any low-level concerns which are held relating to them will be retained for the same duration as that individual's personnel file.

Low-level concerns will be retained on the Company's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

Skills Training UK will also reflect on reported concerns to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the Company's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the Company will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the Company is in any doubt as to whether a low-level concern in fact meets the harm threshold, the DSL will consult with the LADO and take a more collaborative decision-making approach.

## **SAFER RECRUITMENT**

Skills Training UK is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children/vulnerable adults enrolled with the Company whilst deterring and preventing people who are unsuitable to work with children/vulnerable adults from applying or securing employment, or volunteering opportunities, within the Company.

Members of the teaching and non-teaching staff at the Company including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches] are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For individuals engaging in regulated activity, an enhanced DBS check with 'barred list' information will be appropriate. For appointments that will not be engaging in regulated activity, the Company will determine which DBS check is most appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the Company may undertake an online update check through the DBS Update Service.

Full details of the Company's safer recruitment procedures for checking the suitability of staff, and volunteers to work with children and young people is set out in the Company's Recruitment and Selection Policy.

Skills Training UK's protocols for ensuring that any visiting speakers, whether invited by staff or learners themselves, are suitable and appropriately supervised is set out in the Company's Prevent Policy.

## **MANAGEMENT OF SAFEGUARDING**

Skills Training UK's DSL is Steven Mitchell, Improvement and Development Director.

The DDSLs are the person to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSLs' contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the Company. The DSL's responsibility is to maintain an overview of safeguarding within the Company, to open channels of communication with local statutory agencies, refer incidents to third parties (including the Local Authority children's services, the DBS, Channel, and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the Company's policies and procedures in practice. The DSL works with the Senior Leadership Team and Chief Executive Officer to review and update the Company's safeguarding policy.

Where a learner leaves the Company, including for in-year transfers, the DSL will also ensure their child/vulnerable adult protection file is transferred to the new organisation (separately from the main learner file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child/vulnerable adult protection file, the DSL should also consider if it would be appropriate to share any additional information with the new organisation in advance of a child/vulnerable adult leaving to help them put in place the right support to safeguard this child/vulnerable adult and to help the child/vulnerable adult thrive in the organisation.

During teaching hours, the DSL and/or a DDSL will always be available in person for staff to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted via the details provided in the Key Contacts section. For out of hours activities, the DSL is available to be contacted on the mobile number supplied in the Key Contacts section and via the [safeguarding@skillstraininguk.com](mailto:safeguarding@skillstraininguk.com) email address which is monitored by both DSL/DDSL.

The DSL or DDSL should liaise with the relevant Local Authority, Clinical Commissioning Group, and Police force and work with other agencies in line with *WT*. "*NSPCC - When to call the police*" can assist the DSL or DDSL understand when they should consider calling the police and what to expect when they do. If the Company has questions about any police investigation, it will ask the police. The DSL or DDSL will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DSL and DDSLs should be confident as to what local specialist support is available to support all children/vulnerable adults involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Senior Leadership Team and Executive Board should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Senior Leadership Team is ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to

safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

## **TRAINING**

Induction and training are in line with advice from Multi-Agency Safeguarding Hubs, Education and Training Foundation, DFE guidelines for Further Education, and Local Authority Safeguarding Teams.

### **All Staff**

All new staff, including temporary and contracted staff, will be provided with induction training that includes:

- the child protection safeguarding policy (including the policy and procedures to deal with child-on-child abuse);
- the role and identity of the DSL(s) and any DDSLs
- the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct including the Company's whistleblowing procedure and the acceptable use of technologies policy, staff/learner relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE* at least (or, for staff that do not work directly with children, Annex A)
- Senior management and staff who work directly with children will also be required to read Annex B of *KCSIE* (and *Part five of KCSIE*).

Copies of the above documents are provided to all staff during induction.

All staff are also required to:

- Read at least Part one of *KCSIE* (or, for staff that do not work directly with children, Annex A) and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via the People Team who will request confirmation that the document has been read via an automatic push notification on BreatheHR.
- Understand key information contained in Part one (or, for staff that do not work directly with children, Annex A) of *KCSIE*.
- Receive training in safeguarding and child protection regularly, in line with advice from the DFE Further Education Commissioner, [relevant Local Authority, Clinical Commissioning Group, and Police force]. Training will include online safety and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children/vulnerable adults effectively, including online. Skills Training UK provides these via, for example, regular staff training and updates, circulation of DFE updates, staff meetings, and through observations and learning walks undertaken by the Business Improvement Team.

The Chief Executive Officer will ensure that all Board and Senior Leadership Team members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at the Company are effective and support the delivery of a robust whole company approach to safeguarding. Their training should be regularly updated.

Members of the Board and Senior Leadership Team are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the Company to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

### **DSL(s)**

The DSL receives updated child and vulnerable adult protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences,

supporting children/vulnerable adults in need, identifying children/vulnerable adults at risk of radicalisation, record keeping and promoting a culture of listening to children/vulnerable adults, training in the relevant Local Authority, Clinical Commissioning Group, and Police force approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*. Regardless of their learner mix, the DSL undertakes training on the responsibilities for both child safeguarding and adult safeguarding and as such is the nominated lead for both safeguarding adults and for safeguarding children.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the Company will support the DSL in developing their knowledge and skills to understand the views of children/vulnerable adults including to encourage a culture of listening to children/vulnerable adults and taking account of their wishes, as well as having an awareness of the difficulties children/vulnerable adults may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSL.

## **OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Steven Mitchell is the Senior Leadership Team and Board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the Company.

Skills Training UK considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the Company's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. Policies are updated by Skills Training UK drawing on the expertise of staff, including the DSL(s), in shaping the Company's safeguarding arrangements and policies.

Skills Training UK's safeguarding policies and procedures will be transparent, clear, and easy to understand for staff, learners, parents, and carers.

If there has been a substantiated allegation against a member of staff, the Company will work with the LADO to determine whether there are any improvements to be made to the Company's procedures or practice to help prevent similar events in the future.

## **THE COMPANY'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **Teaching children/vulnerable adults how to keep safe**

The Executive Board and Chief Executive Officer ensures that all learners are taught about safeguarding, including online safety to help children/vulnerable adults to adjust their

behaviours, both inside and outside of the classroom, in order to reduce risks and build resilience, including to radicalisation. This includes teaching learners about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people, and vulnerable adults. Skills Training UK recognises that a "one size fits all" approach may not be appropriate for all children/vulnerable adults, and a more personalised or contextualised approach for more vulnerable children/adults, victims of abuse and some SEND children/adults might be needed.

Skills Training UK has appropriate filters and monitoring systems in place to safeguard children/vulnerable adults from potentially harmful and inappropriate material online when using the Company's IT system. Such systems aim to reduce the risk of children/vulnerable adults being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children/vulnerable adults being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child/vulnerable adult's likelihood of, or causes, harm for example making, sending and receiving explicit images. The Company recognises that children/vulnerable adults have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G) which means that children/vulnerable adults may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst in the classroom undetected. Further detail of the policy and procedures in relation to online safety can be found in Skills Training UK's IT User Policy which also includes detail on the use of mobile and smart technology in the classroom, including the Company's management of the associated risks, and the Company's IT arrangements to ensure that children/vulnerable adults are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the Company's systems. These systems will be reviewed periodically.

Skills Training UK will liaise with parents to reinforce the importance of children/vulnerable adults being safe online and the systems the Company uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will ask to access and who from the Company their child is going to be interacting with online.

### **Looked after children**

The Board/Chief Executive Officer ensures that staff have the skills, knowledge and understanding necessary to keep safe any children/vulnerable adults on roll who are looked after by a Local Authority.

The People Director is the designated member of staff who has responsibility for their welfare and progress. Skills Training UK ensures that the designated member of staff receives



appropriate training to carry out their role. Training will be sourced and coordinated with the DSL to ensure the efficacy and availability of training meets business requirements.

### **Arrangements for visiting speakers**

Skills Training UK has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. Skills Training UK's responsibility to learners is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the Company and British values.

Skills Training UK is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend Company premises. This will consider any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. Skills Training UK may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on Company premises, will be supervised by a Company employee. On attending the Company premises, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. Skills Training UK shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy and Risk Assessment/PREVENT Policy which is provided on the Skills Training UK intranet.

## APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or DDSLs).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the classroom and/or can occur between children/vulnerable adults outside of these environments. All staff, but especially the DSL and DDSLs, should consider whether children/vulnerable adults are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children/vulnerable adults 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), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children/vulnerable adults are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children/vulnerable adults can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

**In all cases, if staff are unsure, they should always speak to the DSL (or DDSLs).**

**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/vulnerable adult (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child/vulnerable adult such as to cause severe and adverse effects on the child/vulnerable adult's emotional development. It may involve conveying to a child/vulnerable adult that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child/vulnerable adult 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/vulnerable adults. These may include interactions that are beyond a child/vulnerable adult's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child/vulnerable adult participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children/vulnerable adults frequently to feel frightened or in danger, or the exploitation or

corruption of children/vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a child/vulnerable adult, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child/vulnerable adult or young person to take part in sexual activities, not necessarily involving violence, whether or not the child/vulnerable adult 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/vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children/vulnerable adults to behave in sexually inappropriate ways, or grooming a child/vulnerable adult 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/vulnerable adults. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children/vulnerable adults of any sex (also known as child-on-child abuse). This can also occur through a group of children/vulnerable adults sexually assaulting or sexually harassing a single child/vulnerable adult or group of children/vulnerable adults. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Education providers 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.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the classroom. Sexual harassment is likely to violate a child/vulnerable adult's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. 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; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will 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 education setting.

**Harmful sexual behaviour:** problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour.” Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children/vulnerable adults can be considered harmful if one of the children/vulnerable adults is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child/vulnerable adult can abuse an older child/vulnerable adult, particularly if they have power over them, for example, if the older child/vulnerable adults is disabled or smaller in stature.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include ‘dick pics or ‘pics’ or may be referred to by adults or professionals as ‘youth produced/involved sexual imagery’, ‘indecent imagery’, ‘image based sexual abuse’ or ‘sexting’.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online

- images created or shared are used to abuse peers e.g., by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UK Council for Internet Safety guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

**Upskirting:** is a criminal offence and typically involves taking 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. Anyone of any sex can be a victim.

**Neglect:** the persistent failure to meet a child/vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child/vulnerable adult's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Self-neglect:** this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

**Psychological abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

**Financial or material abuse:** including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

**Discriminatory abuse:** including forms of harassment, slurs, or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, or religion.

**Organisational abuse:** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice because of the structure, policies, processes, and practices within an organisation.

**Serious violence:** indicators which may signal that children/vulnerable adults are at risk from, or are involved with, serious violent crime includes increased absence from the classroom, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a meaningful change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children/vulnerable adults have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from the classroom or permanently excluded from a course, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse and sexting put children/vulnerable adults in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child sexual exploitation (CSE):** CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE (Child Sexual Exploitation) does not always involve physical contact; it can also occur using technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16- and 17-year-olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g.; they believe they are in a genuine romantic relationship.

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.



The below CCE (Child Criminal Exploitation) indicators can also be indicators of CSE, as can:

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

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. 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, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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



The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

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

**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 exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children/vulnerable adults can be targeted and recruited into county lines in several locations including schools (mainstream and special), further and higher educational institutions, children’s homes, and care homes. Children are increasingly being targeted and recruited online using social media. Children/vulnerable adults 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 ways of identifying 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/vulnerable adult is criminally exploited through involvement in county lines are children/vulnerable adults who:

- go missing and are subsequently found in areas away from their home;
- that 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/vulnerable adult’s involvement in county lines is available in guidance published by the Home Office.

**Modern Slavery:** 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 National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

**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 an education provider'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/vulnerable adults 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/vulnerable adult in this area, the DSL (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. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - [NCSC.gov.uk](https://www.ncsc.gov.uk).

**Mental health:** all staff should be aware that mental health problems can, in some cases, be an indicator that a child/vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children/vulnerable adults day-to-day and

identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children/vulnerable adults have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children/vulnerable adult's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child/vulnerable adult that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSLs.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

**So called 'honour based' abuse** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A learner may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A learner may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from the classroom and/or noticeable behaviour changes (e.g., withdrawal or depression) on the learner's return.
- A learner is reluctant to undergo medical examination.

**If staff have a concern that a learner may be at risk of FGM, they should speak to the DSL or DDSLs who will (where appropriate) activate local safeguarding procedures,**

## using existing national and local protocols for multi-agency liaison with police and Children's/Adult Social Care.

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a learner is at risk (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 it involves a learner over 18, teachers should follow the Company's local safeguarding procedures.

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 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 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 communities use religion and culture to coerce a person into marriage. Education providers can play a key role in safeguarding children/vulnerable adults from forced marriage. There are a range of potential indicators that a child/vulnerable adult may be at risk of forced marriage, details of which can be found on pages 13-14 of the *multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. Staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

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

in children/vulnerable adult's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children/vulnerable adults who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in education settings should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL or the DDSLs, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child/vulnerable adult leaving, the DSL should consider if it would be appropriate to share any information with the new organisation. For example, information that would allow the organisation 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/vulnerable adult arrives at the new organisation.

**Special educational needs and/or disabilities (SEND), or learners with certain health conditions:** Learners with SEND or certain health conditions can face additional safeguarding challenges. These children/vulnerable adults may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect or bullying.

These can include:

- assumptions that indicators of abuse such as behaviour, mood and injury relate to the child/vulnerable adult's condition without further exploration;
- these children/vulnerable adults being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children/vulnerable adults;
- the potential for children/vulnerable adults with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in the classroom or the consequences of doing so.

Staff will support such learners in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

**Lesbian, gay, bisexual, or trans ("LGBT"):** The fact that a child/vulnerable adult may be LGBT is not in itself an inherent risk factor for harm. However, children/vulnerable adults who are LGBT can be targeted by their peers. In some cases, a learner who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children/vulnerable adults who identify as LGBT. Risks can be compounded where children/vulnerable adults who are LGBT lack a trusted adult with whom they can be open. Skills Training UK endeavours to provide a safe space for LGBT children/vulnerable adults to speak out or share their concerns with trusted members of staff.

**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 but not limited to, psychological, sexual, 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, socio-economic 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 child-on-child abuse is sometimes referred to as ‘teenage relationship abuse.’ Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.<sup>242</sup>

Staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child/vulnerable adult’s welfare. Skills Training UK should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social



behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a learner may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child/vulnerable adult has been harmed or is at risk of harm, in accordance with this policy.

**Children who go missing from education:** A child going missing from education is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It 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 FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the Company's procedures for dealing with children who go missing, particularly persistently. Skills Training UK's procedure for dealing with children who go missing can be found in our Attendance Policy. All unexplained absences will be followed up in accordance with this Skills Training UK's Attendance Policy.

Skills Training UK shall inform the Local Authority of any learner who is going to be added to or deleted from the Company's [admission register] at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the Local Authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

Attendance registers are carefully monitored to identify any trends. Skills Training UK will inform the Local Authority of any learner who fails to attend regularly or has been absent without the Company's permission for a continuous period of 3 learning days or more, at such intervals as are agreed between the Company and the Local Authority. .

Action should be taken in accordance with this policy if any absence of a learner from the classroom gives rise to a concern about their welfare. Skills Training UK's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the Local Authority children's social care and need a social worker.

**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 an education setting can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

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](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).<sup>250</sup>

**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 available on the gov.uk website.

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. Skills Training UK may refer some parents and carers to this service where appropriate.

**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.