

# WO007 Safeguarding and The Prevent Duty Policy and Procedures v21

## 1. **5 Steps to Safeguarding:** What to do if you have a welfare, Safeguarding or Prevent Duty Concern

### STEP 1: RECOGNISE

Someone has disclosed a concern, or you have observed possible signs of abuse or neglect

### STEP 2: RESPOND

Where needed, listen to the person and reassure them that their concerns will be taken seriously. Do let them know you will be referring it to the safeguarding team and reassure them.

### STEP 3: RECORD

Document the concern immediately using our system Tootoot.

### STEP 4: REPORT

Your concern, raised on Tootoot will go straight to the Safeguarding team. Or alternatively use the following key contacts:

**Telephone: 01753 291 999 or Email: [safeguarding@impactfutures.co.uk](mailto:safeguarding@impactfutures.co.uk) / [safeguarding@thechildcarecompany.co.uk](mailto:safeguarding@thechildcarecompany.co.uk)**

### STEP 5: REFER

The Safeguarding team will assess the concern and take the appropriate action.

## 2. The Detailed Policy and Procedure

### Introduction and Ethos

- 2.1 The Childcare Company and Impact Futures are committed to taking every reasonable step to ensure the safety and welfare of children, young people and adults within their remit. Our intent is to exceed our social and moral responsibilities to protect in accordance with the law and where appropriate, with the support of relevant external agencies.
- 2.2 All children, young people and adults, without exception, have the right to protection from abuse regardless of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender, sexual orientation or socio-economic background. We will uphold and teach others to uphold the **British Values** of **Democracy, Rule of Law, Individual Liberty** and **Respect** as well as promoting principles that support of **Equality of Opportunity** for all.
- 2.3 We instill a safer recruitment policy led by our Director of Finance and HR ensuring all employees are carefully selected, trained, supervised and have an appropriate level of DBS check in place where required. We will ensure that all employees adopt and abide by all Company policies and procedures at all times. Once they have a current DBS and the DBS is for the relevant sector they are working in, they can contact and meet learners, however we will still apply for a TCC/IF DBS. If someone joins the Organisation without a current DBS they must not, under any circumstances, have access to learner records or make lone visits to learners. Although they can accompany a member of staff who has a DBS, that member of staff must never leave the non-DBS member of staff alone with a learner(s).
- 2.4 We recognise that certain national and local incidents could have a temporary or long-term impact on learners and members of staff, and as such we ensure these are monitored and considered by all in relation to our safeguarding responsibilities. Notably in 2020 the entire country went into lockdown due to the COVID-19 Pandemic and this was followed by a range of local restrictions. Our policy takes these additional worries, concerns and risks into consideration.

### 3. Our Commitment

- 3.1 We promote the welfare of every learner and keep them safe.
- 3.2 We are committed to practice in a way that protects every learner.
- 3.3 We believe that learners should never experience any form of abuse, discrimination, harassment or victimisation.
- 3.4 We will protect learners from radicalisation and extremism by responding swiftly where learners are vulnerable to these issues.
- 3.5 We will provide staff and volunteers with regular updates and annual training on Safeguarding and Prevent.
- 3.6 We will record and check the details of all visitors to all our premises.
- 3.7 We recognise that ignoring abuse is not an option and all staff must report any concerns for the wellbeing of learners in accordance with this policy.
- 3.8 We also commit to keeping a Safeguarding and Prevent action plan/risk register.

### 4. Aims

- 4.1 Promote fundamentals British Values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourages every learner to raise any concerns.
- 4.2 Encourage learners to develop a sense of autonomy and independence in their learning and development.
- 4.3 Work with employers to build their understanding of a commitment to the principles of safeguarding and Prevent duty.
- 4.4 Liaise with other statutory agencies to ensure legislative procedures are current.
- 4.5 Liaise with external agencies to support staff and learners where required.

### 5. Scope and Purpose

#### 5.1 This policy applies to:

- (a) The Childcare Company, Impact Futures learners and customers.
- (b) All employees (on all basis).
- (c) Employers (organisations that work in partnership with us).
- (d) Suppliers (external partners who are in receipt of and/or provide TCC/IF training/delivery).
- (e) External stakeholders and visitors (please see visitor invitation form).

## 6. Context

- 6.1 This policy has been developed in accordance with the principles established by the Children Acts, other relevant Acts and related guidance. This includes:
- (a) Education and Training (Welfare of Children) Act 2021 - [Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](https://legislation.gov.uk)
  - (b) Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2024 - [Keeping children safe in education 2024 \(Statutory guidance for schools and colleges\)](#)
  - (c) Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2021 Part 1 Annex: Further Information - [Keeping children safe in education 2024 \(part one only\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
  - (d) Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (*HM Government*) July 2018 - [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
  - (e) What to do if you're worried about a child being abused (*HM Government*) March 2015 - [Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
  - (f) Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
  - (g) Prevent duty guidance: DfE for further education institutions in England and Wales April 2021 - [Prevent duty guidance: for further education institutions in England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
  - (h) Security Act 2015 section 29 [Counterterrorism and Security Act 2015](#)
  - (i) Ofsted – [Ofsted safeguarding policy](#)
  - (j) OFSTED – [Education Inspection Framework \(2013\)](#) and [Further Education and Skills Inspection Framework 2024](#)

## 7. Definition of Safeguarding and Prevent Duty

### 7.1 Safeguarding

(a) "Safeguarding is not just about protecting learners from deliberate harm. It includes a wide range of issues relating to learner's welfare, health and safety."

(b) **Safeguarding is defined as:**

- (i) Protecting children and vulnerable people from maltreatment.
- (ii) Preventing impairment of children's and vulnerable learner's health or development.
- (iii) Ensuring that children and vulnerable learners are growing up in circumstances consistent with the provision of safe and effective care.
- (iv) Acting to enable all children and vulnerable learners to have the best life-chances.

(c) **Significant Harm**

- (i) Harm means ill treatment or the impairment of health or development, including impairment suffered from seeing or hearing the ill treatment of others.
- (ii) Development means physical, intellectual, emotional, social or behavioral development.

(iii) Health means physical or mental health.

(iv) Ill treatment includes physical & Sexual abuse and forms of ill treatment which are not physical (s.31 (9) Children Act 1989 as amended by the Adoption and Children Act 2002).

(d) Welfare is defined as a child or vulnerable learner in need of universal help from those already involved or from a single or multiple agency response.

(e) All safeguarding policies will be reviewed on an annual basis by the Designated Safeguarding Lead and Senior Leadership Team which has responsibility for oversight of company safeguarding and child protection systems.

(f) The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the Board of Directors. The Board of Directors will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

- (g) The Childcare Company and Impact Futures acknowledges that this policy will incorporate a range of safeguarding issues including:
- (i) Neglect.
  - (ii) Physical abuse.
  - (iii) Child Sexual Exploitation (CSE).
  - (iv) Sexual abuse, violence, and harassment.
  - (v) Emotional abuse.
  - (vi) Bullying, including online bullying and prejudice-based bullying.
  - (vii) Racist, disability and homophobic or transphobic abuse.
  - (viii) Gender-based violence/violence against women and girls.
  - (ix) Peer-on-peer abuse, such as sexual violence and harassment.
  - (x) Radicalisation and/or extremist behaviour.
  - (xi) Child Criminal Exploitation (CCE), including trafficking and county lines.
  - (xii) Serious violent crime.
  - (xiii) Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exportation or radicalisation; and risks of accessing and generating inappropriate content, for example 'sexting'.
  - (xiv) Teenage relationship abuse.
  - (xv) Upskirting.
  - (xvi) Substance misuse.
  - (xvii) Issues that may be specific to a local area or population, for example gang activity and youth violence.
  - (xviii) Domestic abuse.
  - (xix) Female genital mutilation.
  - (xx) Forced marriage.
  - (xxi) Fabricated or induced illness.
  - (xxii) Poor parenting.
  - (xxiii) Homelessness.
  - (xxiv) So-called honour-based violence.
  - (xxv) Other issues not listed here but pose a risk to learners and vulnerable young adults.
- (h) Every member of staff at The Childcare Company and Impact Futures recognises that learners experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting learners from any other risks.

## 7.2 The Statutory Framework

- (a) The Children Act 1989 placed a duty on local authorities to investigate situations where a child is at risk of significant harm. Schools, Colleges and Providers have a legal obligation to work with investigating agencies acting on behalf of children in need guidance was published in 'Safeguarding Children in Education (2004)'. It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children and underpinned our common law duty of care.
- (b) This was replaced and extended in January 2007 by 'Safeguarding Children and Safer recruitment in Education, which includes more specific guidance (including some statutory requirements) relating to the recruitment and vetting of staff. The responsibility for carrying out their duties in compliance with the arrangements set out by TCC/IF, we are not the investigating agency. This function is carried by local authority Children Services, or other agencies with statutory powers. The Children Act 1989, and subsequent legislation and guidance, and concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. However, is recognised that children acquire a degree of legal capacity and maturity prior to their 18<sup>th</sup> birthday, and that there are learners over 18 who continue to be vulnerable due to a learning difficulty and/ or disability.
- (c) Children are defined in the Children Act 1989 and 2004 as a person under the age of 18. The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable learner as a person aged 18 or over and:
- (i) Teenagers.
  - (ii) Children and young people missing from education.
  - (iii) Those at risk of FGM (Female Genital Mutilation).
  - (iv) Those at risk of Forced Marriages.
  - (v) Those at risk of Honor Based Violence.
  - (vi) Trafficked children and young people.
  - (vii) Those in the 'Looked After' system.
  - (viii) Children and young people living away from home.
  - (ix) Children from some minority ethnic groups.
  - (x) Those with abuse and trauma in their past.
  - (xi) Those living in sheltered accommodation, detained in custody or under a probation order.
  - (xii) Those living with domestic violence, parental substance misuse and/or parental mental health, receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or Mental Health conditions.

- (d) This policy and related procedures are driven by the following legislation and guidance:
- (i) The Children Act 1989.
  - (ii) The Children Act 2004.
  - (iii) Working Together to Safeguard Children 2018.
  - (iv) What to do if you are worried a child is being abused 2015.
  - (v) Keeping Children Safe in Education (KCSIE) 2018 & 2021, 2022, 2023, 2024.
  - (vi) Protection of Freedoms Act 2012.
  - (vii) Care Act 2014.
  - (viii) Keeping Learners Safe 2015.
  - (ix) Safeguarding Children: Working Together Under the Children Act 2004.
  - (x) Disqualification under the Children Act 2006 (2018).
  - (xi) Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)).

### 7.3 The Prevent Duty

- (a) Section 26(1) of the Counterterrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for independent training providers, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.
- (b) TCC/IF understand their duties and conditions of funding and comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners. Requirements include:
- (i) Policy and management of external speakers and events.
  - (ii) Partnership management, including employer partners and specialist trainers, covering DBS and other checks.
  - (iii) Risk assessment relating to the scope of our business and associated risk.
  - (iv) Action planning as a result of the risk assessment.
  - (v) Staff training is part of the new starter induction process and annual refresher training is planned as part of our CPD policy. We take the opportunity to use news items both nationally and locally to enhance the training of staff and support them to pass this knowledge to their learners and Apprentices.
  - (vi) Welfare and pastoral care for learners, additional support needs identified and implemented.
  - (vii) IT policies.
  - (viii) Monitoring and enforcement – the Designated Safeguarding Lead (DSL) leads in this area and report back to the Board quarterly.



- (c) In 2011, the Government published a Prevent Strategy which raised awareness of the specific need to safeguard children, young people and families from extremism and radicalisation.
- (d) Extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to deter them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- (e) Prevent is about safeguarding our learners to keep them both safe and within the law. The Prevent Duty is not about preventing learners from having political views and concerns but about supporting them to use those concerns or act on them in non-extreme ways.
- (f) **Radicalisation & Extremism**
- (i) The holding of extreme political or religious views e.g. animal welfare rights, environmentalists, EDL/ white supremacy groups, anti – gay groups, Islam/Christian ideology. The Counter Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children’s service providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. (“The Prevent duty”). The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The Childcare Company / Impact Futures in clear that this exploitation and radicalization should be viewed as a Safeguarding concern and that protecting children from the risk of radicalisation is part of the company’s’ safeguarding duty.
- (ii) Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- (iii) Extremism is defined by the Government in the Prevent Strategy as: 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 belief.

## 8. Key Responsibilities

- 8.1 Everyone who comes into contact with learners and their families has a role to play in safeguarding.
- 8.2 The Childcare Company and Impact Futures have a Designated Safeguarding Lead (DSL), Deputy DSL's and team of Designated Safeguarding Officers (named below). The DSL will take the lead role in ensuring that The Childcare Company and Impact Futures have an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policy and structures supporting safeguarding are reviewed at least annually. Contact details of all safeguarding personnel are available through the contact information on SharePoint. The Board Director – Safeguarding represents the Board and has responsibility for ensuring the Board are furnished with relevant and timely information.
- 8.3 **Board Director – Designated Safeguarding Lead (DSL)**  
 (a) Becki Lee, Director of Quality
- 8.4 **Deputy Designated Safeguarding Leads (DSL)**  
 (a) Lorna Bramley, Head of EPA and Outcomes  
 (b) Fiona Millen, Inclusion Resourcing Specialist  
 (c) Mia Kendrew, Inclusion and ALS Lead
- 8.5 **Designated Safeguarding Officers (DSO)**  
 (a) Emma Kerin, Inclusion Resourcing Specialist/ALS Coach  
 (b) Ashleigh Braithwaite, Learner Engagement Lead  
 (c) Leanne Gartland, Training Manager – Clinical  
 (d) Vicky Parr, Development Coach  
 (e) Sarah Leferve, Client Partnership Manager  
 (f) Lucy Wright, Client Relationship Manager  
 (g) Kerry Argent, Development Coach  
 (h) Julian Surtrees, Development Coach  
 (i) Mark Darbey, Internal Quality Assurer
- 8.6 The DSO list and contact details can be found on the poster in our two main centre bases, head office – Slough and Birmingham and on our HR system Breathe and SharePoint Safeguarding page for staff and for Apprentices and learners on Aptem. Additionally, we have an emergency safeguarding phone for Apprentices that learners can use in the event of a safeguarding emergency. We also have an online reporting system called Tootoot where learners and employees can use to report any safeguarding and Prevent concern. This can be accessed at any time of the day, every day. The number is displayed on our e-portfolio system home page and is easily accessible.

8.7 The Board is accountable for ensuring that the Designated Safeguarding Lead has ongoing training and support to develop resources. The DSL is responsible for the training and updates for the Deputy Designated Safeguarding Lead and Designated Safeguarding Officers.

## 8.8 Designated Safeguarding Lead (DSL)

(a) The Childcare Company and Impact Futures have appointed (**Becki Lee**), as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems across our organisation and its related activities. The DSL is supported by three Deputy Designated Leads to ensure full coverage each day.

(b) The Designated Lead is responsible for ensuring that:

(i) There are a sufficient number of trained and competent colleagues with designated responsibility for safeguarding.

(ii) All colleagues receive adequate training in order to identify potential safeguarding issues and to respond appropriately to disclosures.

(iii) Robust policies are maintained, and all other relevant information and material is effectively communicated across the organisation.

(iv) Record keeping is accurate and secure.

(v) Providing the Board with a quarterly written report and attend Board meetings by invitation.

(c) The organisation has appointed Designated Safeguarding Officers to support the DSL (see list at 8.5). The Designated Safeguarding Officers will undertake appropriate training to enable them to fulfil this role effectively.

(d) It is the role of the DSL to:

(i) Act as the central contact point for all staff to discuss any safeguarding concerns.

(ii) Maintain a confidential recording system for safeguarding and learner protection concerns.

(iii) Liaise with other agencies and professionals in line with Working Together to Safeguard learners.

(iv) Represent, or ensure the organisation is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences).

(v) Be available to discuss any safeguarding concerns.

- (vi) Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2023).
- (vii) Ensure that locally established procedures are followed and making referrals to other agencies as necessary.
- (viii) Liaise with other agencies and professionals in line with Working Together to Safeguard learners.
- (ix) Represent, or ensure the organisation is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences).
- (x) Be available to discuss any safeguarding concerns.
- (xi) Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2023).
- (xii) Ensure that locally established procedures are followed and making referrals to other agencies as necessary.

### 8.9 **Chief People Officer and The HR Team.**

- (a) The Childcare Company and Impact Futures operate using a safer recruitment process and the appropriate checks are carried out on all new staff joining the organisation.
- (b) As part of our approach to Safer Recruitment the HR and Recruitment Assistant (HRRRA) is responsible for ensuring all new employees have a current DBS check at the level appropriate for their role. This includes working with the individual to submit a check or checking on the Update Service. We expect all employees to enrol for the Update Service. The HRRRA will pass any disclosures onto the Finance and HR Director and / or the Operations Director in order that a decision can be taken about the continuation of a job offer or employment.
- (c) The HRRRA carries out checks to confirm that they are eligible to work in the UK and they carryout identity checks using documents such as birth certificates, marriage/divorce certificate, passports, bank statement and utility bills.
- (d) The HRRRA also take up references for all new starters, this is important because there might be something of relevance to safeguarding or the Prevent Duty that needs to be considered in relation to confirming employment with TCC/IF.
- (e) As part of the recruitment process shortlisted candidates are informed that online searches may be done as part of pre-recruitment checks.
- (a) The HRRRA ensures that we adhere to our safer recruitment process which includes guidelines for advertising roles, clearly stating our commitment to safeguarding and identifying the DBS requirement, CV check and checking gaps in employment history, a completed application form (we will only progress applicants that complete our application form) and qualification checks. When shortlisting candidates, the HR Administrator ask the candidate to declare in writing, if they have a criminal record or if they are on the barred list.

## 8.10 All Staff

- (a) The welfare and safety of learners is the responsibility of all staff across The Childcare Company and Impact Futures.
- (b) **All members of staff have a responsibility to:**
- (i) Provide a safe environment in which learners can learn.
  - (ii) Ensure all learners are able to develop appropriate strategies to recognise and respond to risk and build resilience.
  - (iii) Identify and recognise learners who may be in need of additional support, who are suffering, or are likely to suffer significant harm.
  - (iv) Provide support and assistance for learners, where appropriate and reasonable.
  - (v) Take appropriate action to prevent safeguarding concerns escalating and work with other services as needed.
  - (vi) Safeguard learner's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
  - (vii) Safeguard learner's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
  - (viii) Maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the learner.
  - (ix) Respond to and refer any concerns about learners or other members of the community in accordance with this policy.
  - (x) Contribute towards, read and adhering to the organisation policies.
  - (xi) Any concern for a learner's welfare MUST always be reported to the Designated Safeguarding Lead.
- 8.11 Employers and where relevant parents can obtain a copy of The Childcare Company and Impact Futures Safeguarding Policy and other related policies on request.

## 9. Staff Induction Awareness and Training

9.1 All members of staff have been provided with a copy of part one of the “**Keeping Children Safe in Education**” ([Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91222/Keeping_Children_Safe_in_Education_2024.pdf) 2024 which covers Safeguarding information and have received the appropriate training relevant to their role within the organisation as part of their induction training.

### 9.2 **Definition of Channel General Awareness Prevent Training:**

- (a) Channel training supports identification of who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist activity.
- (b) All staff members will receive regular safeguarding, channel, prevent and learner protection updates, as required, but at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively.
- (c) The Senior Leadership Team identify in their monthly meeting any Prevent, safeguarding issues, developments or training requirements, the DSL provides advice and guidance on Prevent and Safeguarding monthly staff CPD sessions.

### 9.3 **Staff training is designed to ensure that all staff can:**

- (a) **Recognise** potential safeguarding and learner protection concerns involving students and adults (colleagues, other professionals, and parents/carers).
- (b) **Respond** appropriately to safeguarding issues and take action in line with this policy.
- (c) **Record** concerns in line with The Childcare Company and Impact Future policy.
- (d) **Report** submit a concern using the referral form or speak to a member of the Safeguarding team.
- (e) **Refer** concerns to the Safeguarding team and be able to seek support external to The Childcare Company and Impact Futures if required.

## 10. Safe Working Practices

- 10.1 All members of staff are required to work within clear guidelines on Safe Working Practice.
- 10.2 Learners may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff should take care not to place themselves in a vulnerable position regarding learner protection or potential allegations and work within professional boundaries. All staff having direct contact with learners must ensure there is an appropriate environment with learners e.g. in their workplace in view of other people. Please refer to section 13 for more detail.
- 10.3 Physical intervention should only be used when the learner is endangering themselves or others and such events should be recorded and signed by a witness.
- 10.4 Full advice and guidance can be found in the guidance document listed in point 4.1, which includes the online links.
- 10.5 Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in the guidance document listed in point 4.1, specifically “**Keeping Children Safe in Education**” ([Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education-2022) 2022, 2023, 2024).
- 10.6 **Record Keeping**
- (a) Staff will record any welfare concerns that they have about a learner on The Childcare Company and Impact Futures **Tootoot online platform**. ([Tootoot](#)).
- (b) All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to a member of the Safeguarding team if they have concerns about a child.
- 10.7 A learner’s appearance, behaviour or symptom can include the following:
- (a) Sudden mood swings e.g. withdrawal, rage, fear.
- (b) Seems distracted or distant at odd times.
- (c) Depression, anxiety.
- (d) Drug and alcohol abuse.
- (e) Self-injury.
- (f) Suicide attempts.

- (g) Sudden change in eating habits.
- (h) Goes missing from work and home and cannot be contacted.
- (i) Thinks of self or body as repulsive.
- (j) Lack of money to buy basic items.
- (k) Malnutrition.
- (l) Inadequate personal hygiene.
- (m) Running away from home.
- (n) Fear of intimacy or closeness.
- (o) Other issues not listed here but pose a risk to learners and vulnerable young adults.

- 10.8 All staff should make notes on the **online Tootoot portal** as soon as possible, use the learner's own words and submit to the **Safeguarding team** immediately once complete.

During periods of lockdown, extended working from home, furlough and similar approach that keeps people isolated, staff should use their skills of observation and listening to identify any potential safeguarding issues that are as a result of the restrictive conditions and take action in line with this policy.

- 10.9 The following areas should be considered:
- (a) Date, time, place.
  - (b) Accept what you are being told.
  - (c) Listen without displaying shock or disbelief.
  - (d) Reassure the learner.
  - (e) Acknowledge their courage talking to you.
  - (f) Do not promise confidentiality.
  - (g) Do not promise that everything will be alright.
  - (h) Avoid leading questions but ask open ended ones.
  - (i) Clarify anything that is not clear, or you do not understand.
  - (j) Check to see if any others may be at risk.
  - (k) Explain what you will do next, i.e. inform DSL.
  - (l) In all incidences the DSL will make a decision as to if the concern requires referral to an outside agency.
- 10.10 If, at any point, there is a risk of immediate serious harm to a learner, a referral should be made to the police or to social services immediately and can be made by any member of staff.
- 10.11 Once reported the DSL will agree a designated safeguarding officer to take responsibility of the matter and will take all the necessary actions in a timely manner.
- 10.12 All safeguarding concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing.
- 10.13 A log of all Safeguarding concerns raised is kept electronically and accessible only to the DSL and deputy DSL.



- 10.14 Safeguarding records are kept for individual learners and separate from all other records relating to the learner. They are retained centrally and securely by the DSL and are shared with staff on a 'need to know' basis only. The CEO will be kept informed of all issues by the DSL, however learners names won't be disclosed to maintain confidentiality.
- 10.15 Staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary in accordance with the policy. Staff must never promise confidentiality and learners should understand when we need to share information to protect them or access support.
- 10.16 Guidance can be found at 4.1.b "**Keeping Children Safe in Education**" ([Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#) 2022,2023, 2024.

## 11. Working with Agencies

- 11.1 The Childcare Company and Impact Futures recognise and are committed to its responsibility to work with other professionals and agencies both to ensure learners' needs are met and to protect them from harm. We will endeavor to identify those learners and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, as appropriate.
- 11.2 Training Providers are not the investigating agency when there are learner protection concerns, and The Childcare Company and Impact Futures will therefore pass all relevant cases to the statutory agencies. We will, however, contribute to the investigation and assessment processes as required and recognise that a crucial part of this may be in supporting the learner while these take place.
- 11.3 The Childcare Company and Impact Futures recognise the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child /Family.
- 11.4 The Childcare Company and Impact Futures Senior Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.
- 11.5 Guidance can be found at 4.1.c "**Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children**" (*HM Government*) July 2018.

## 12. Confidentiality and Information Sharing

- 12.1 The Childcare Company and Impact Futures recognise that all matters relating to learner protection are confidential. The DSL/DDSL's will only disclose information about a learner to other members of staff on a need-to-know basis.
- 12.2 All members of staff must be aware that whilst they have a duty to keep any information about learners, families and colleagues (which they have access to as a result of their role) confidential, they also have a professional responsibility to share information with other agencies in order to safeguard learners. All staff must be aware that they cannot promise a learner to keep secrets which might compromise the learners' safety or wellbeing.
- 12.3 The General Data Protection Regulation (GDPR) and Data Protection Act provides further detail.

## 13. Complaints

- 13.1 The Childcare Company and Impact Futures has a **Complaints Procedure** available to learners, employers and members of staff as an additional method by which to report concerns.
- 13.2 All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff will be dealt with by the Director of Finance and HR and line manager directly.

## 14. Allegations Against Members of Staff

- 14.1 We recognise that it is possible for staff to behave in a way that might cause harm to learners and takes seriously any allegation received. Such allegations should be referred immediately to the DSL who will contact the appropriate line manager and Director of People and HR to agree further action to be taken in respect of the learner and staff member. In the event of allegations of abuse being made against the DSL then staff are advised that allegations should be reported directly to the CEO.
- 14.2 Once the initial investigation has been completed, should it be evident that the allegation against a member of staff is credible, as well as following the company disciplinary policy the company has a duty to report the incident to the relevant external authority and the ESFA using the Contact Form: [Education and Skills Funding Agency \(ESFA\) enquiry form - Customer type - DFE Online Forms](#) using UKPRN 1002278 for learners on the TCC contract and UKPRN 10018916 for learners on the Impact Futures contract, about incidents and referrals.

- 14.3 All staff should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Senior Leadership Team.
- 14.4 All members of staff are made aware of The Childcare Company and Impact Futures whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a learner at risk.
- 14.5 Members of staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding learner protection failures internally. Staff can call: 0808 800 5000.
- 14.6 Guidance can be found at 4.1.b "**Keeping Children Safe in Education**" (*DfE statutory guidance for schools and colleges*) 2023, 2024.

## 15. Allegations Against Learners

- 15.1 The Childcare Company and Impact Futures recognise that young people are capable of abusing their peers. Peer on peer abuse can take many forms, including (but not limited to) bullying, cyberbullying, hazing (initiation type violence), sexualised bullying and violence and sexting. The Childcare Company and Impact Futures is mindful that some potential issues may be affected by the gender, age, ability and culture of those involved. We believe that abuse is abuse and it will never be tolerated, dismissed or minimised.
- 15.2 We will ensure that appropriate curriculum time is dedicated to enable learners to develop an awareness and understanding of abusive behaviour and to ensure that young people recognise warning signs and sources of support both within company and externally.
- 15.3 Learners who have experienced peer on peer abuse will be supported by:
- Offering them an immediate opportunity to discuss the experience with a member of staff of their choice.
  - Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
  - Providing reassurance and continuous support.
  - Working with the wider community and local/national organisations to provide further or specialist advice and guidance.
- 15.4 Learners who are alleged to have abused other learners will be helped by:
- Discussing what happened, establishing the specific concern and the need for behaviour to change.

- (b) Informing employers to help change the attitude and behaviour of the individual.
  - (c) Providing appropriate education and support.
  - (d) Speaking with police or other local services (such as early help or children's specialist services) as appropriate.
- 15.5 The Childcare Company and Impact Futures are aware of and will follow the LSCB procedures ([www.lscb.co.uk](http://www.lscb.co.uk)) for supporting learners who are at risk of harm as a result of their own behaviour.
- 15.6 Guidance can be found at 4.1.b "**Keeping Children Safe in Education**" (*DfE statutory guidance for schools and colleges*) 2023, 2024.
- 15.7 We will ensure that appropriate curriculum time is dedicated to enable learners to develop an awareness and understanding of abusive behaviour and to ensure that young people recognise warning signs and sources of support both within company and externally.
- 15.8 Learners who have experienced peer on peer abuse will be supported by:
- (a) Offering them an immediate opportunity to discuss the experience with a member of staff of their choice.
  - (b) Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
  - (c) Providing reassurance and continuous support.
  - (d) Working with the wider community and local/national organisations to provide further or specialist advice and guidance.
- 15.9 Learners who are alleged to have abused other learners will be helped by:
- (a) Discussing what happened, establishing the specific concern and the need for behaviour to change.
  - (b) Informing employers to help change the attitude and behaviour of the individual.
  - (c) Providing appropriate education and support.
  - (d) Speaking with police or other local services (such as early help or children's specialist services) as appropriate.
- 15.10 The Childcare Company and Impact Futures are aware of and will follow the LSCB procedures ([www.lscb.co.uk](http://www.lscb.co.uk)) for supporting learners who are at risk of harm as a result of their own behaviour.
- 15.11 Guidance can be found at 4.1.b "**Keeping Children Safe in Education**" (*DfE statutory guidance for schools and colleges*) 2024.

## 16. Safeguarding Learners with Special Educational Needs and Disability

- 16.1 The Childcare Company and Impact Futures acknowledge that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.
- 16.2 We will ensure that learners with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- 16.3 Members of staff are encouraged to be aware that learners with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the learner's disability and be aware that learners with SEN and disabilities may not always outwardly display indicators of abuse.

## 17. Online Safety

- 17.1 It is recognised by The Childcare Company and Impact Futures that the use of technology presents particular challenges and risks to learners both inside and outside of the training provision.
- 17.2 The Childcare Company and Impact Futures identifies that the issues classified within online safety are considerable, but can be broadly categorised into three areas of risk.
- (a) **Content:** being exposed to illegal, inappropriate or harmful material.
  - (b) **Contact:** being subjected to harmful online interaction with other users.
  - (c) **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- 17.3 We have identified that during any period of lockdown, extended working from home, furlough and other similar situations which keep people away from others present a greater risk of online abuse and we are vigilant to this end.

- 17.4 The Childcare Company and Impact Futures will ensure that appropriate filtering and monitoring systems are in place when learners and staff access organisational systems and internet provision. We will be careful to ensure that these systems do not place unreasonable restrictions on internet access or limit what learners can be taught with regards to online teaching and safeguarding. We acknowledge that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our role. Learners and staff may have access to systems external to our control such as mobile phones and other internet-enabled devices and technology. By upholding this policy and providing training about these risks associated with being online, including accessing and downloading inappropriate material and images, keeping personal and financial information safe, having secure and different passwords, as well as the risks associated with grooming, we will meet our commitment to take every reasonable step to ensure the safety and welfare of children, young people and adults within their remit.
- 17.5 Guidance can be found at 4.1.b “**Keeping Children Safe in Education**” ([Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100271/Keeping-children-safe-in-education-2022.pdf) 2024.

## 18. Appendices

- 18.1 Appendix 1: Categories of Abuse
- 18.2 Appendix 2: Specific safeguarding Issues
- 18.3 Appendix 3: Additional Advice and Support

## 19. Appendix 1: Categories of Abuse

- 19.1 Abuse is a behaviour towards a person that either deliberately or unknowingly causes a person harm, endangers their life, human or civil rights. It can be passive, e.g. failing to take action or to care for someone, failing to raise the alarm about or abuse; or active e.g. hitting, stealing or doing something that causes harm.
- 19.2 Abuse can be a one-off or something that is repeated. Abuse can be triggered or made worse by an incident or event such as the COVID-19 pandemic in 2020.
- 19.3 **Abuse can be:**
- (a) Physical.
  - (b) Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition.
  - (c) Sexual (including peer on peer abuse involving sexual violence or sexual harassment).
  - (d) Psychological/emotional (including the use of text, social networks and email).
  - (e) Violation of rights e.g. preventing an individual speaking his/her thoughts and opinions.
  - (f) Institutional e.g. failure to provide a choice of meals or failure to ensure privacy or dignity; or
  - (g) Discriminatory in nature e.g. racial, sexual or religious harassment.
  - (h) On-line abuse: cyberbullying, intimidation, exploitation, grooming, radicalisation.
  - (i) Child criminal exploitation including children being used to carry drugs or money from urban to rural areas. In the case of at-risk adults, it may also include physical abuse such as inappropriate restraint, forcing, forcible administration of medication, neglect or abandonment.
  - (j) Financial abuse such as exerting improper pressure to sign over money from pensions or savings, etc.
  - (k) Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## 19.4 Sexual Abuse & Consent:

- (a) Sexual abuse includes sexual violence, sexual harassment and Criminal Sexual Exploitation (CSE).
- (b) Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the learner 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 learners in looking at, or in the production of, sexual images, watching sexual activities, encouraging learners to behave in sexually inappropriate ways, or grooming a learner 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 learners.
- (c) Harassment and bullying are abusive ways of treating others. People who harass or bully use cruel comments, gestures, threats, or actions. They try to insult, demean, exclude, shame, or hurt others. Sometimes, people who harass and bully do it with sexual comments or actions. This is called sexual harassment or sexual bullying. This can be towards all genders by all genders.

### **Sexual harassment and bullying include things like these:**

- (d) Making sexual jokes, comments, or gestures.
- (e) Spreading sexual rumours (in person, by text, or social media).
- (f) Posting sexual comments, pictures, or videos.
- (g) Taking or sending sexual pictures or videos.
- (h) Asking someone for naked pictures of themselves ("nudes").
- (i) Asking for sex or offering to have sex.
- (j) Touching or grabbing someone in a sexual way.



- (k) **What should you do if you're being sexually harassed?**
- (l) **If you can, tell the person to stop.** When it happens the first time, let them know the behaviour is not OK with you. Be calm, and clear. Then walk away. In some cases, that will be enough, but not always. They may not stop. They might even laugh off your request, tease you, or bother you even more.
- (m) **Tell someone.** This is not something you should try to handle on your own. Talk to a parent, relative, your Development Coach or report it through to the Safeguarding Team via Tootoot. It might feel awkward at first to bring it up. But don't let that stop you. If the person you talk to doesn't listen and help, find someone else who will. **We will always listen.**
- (n) **Report it.** If this happens during your learning sessions or at your job, report it to someone in charge. Most workplaces have a sexual harassment policy or a bullying policy to protect you. They need to know in order to help you. And to stop it from happening to others too.
- (o) **Get support.** Your Development Coach or Safeguarding team can support you to find someone to talk to.
- (p) Bystanders can play a big role in stopping harassment and bullying. When people do nothing, shrug it off, or look the other way, it sends a message that it's no big deal to harass. If people say something, it sends a social message that it's not OK. All safeguarding referrals and investigations relating to sexual abuse must be report the ESFA using the Contact Form:  
<https://www.gov.uk/government/organisations/education-and- skillsfunding-agency>

## 19.5 Signs can be:

- (a) Sudden changes in behaviour and educational performance.
- (b) Displays of affection which are sexual and age inappropriate.
- (c) Self-harm, self-mutilation or attempts at suicide.
- (d) Alluding to secrets which they cannot reveal.
- (e) Tendency to cling or need constant reassurance.
- (f) Regression to younger behaviour, for example thumb sucking, playing with discarded toys, acting like a baby.
- (g) Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger.
- (h) Unexplained gifts or money.
- (i) Depression and withdrawal.
- (j) Fear of undressing for PE.
- (k) Sexually transmitted disease.
- (l) Fire setting.

## 19.6 **Physical Abuse:**

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

## 19.7 **Signs can be:**

- (a) Bruises and abrasions around the face.
- (b) Damage or injury around the mouth.
- (c) Bi-lateral injuries such as two bruised eyes.
- (d) Bruising to soft area of the face such as the cheeks.
- (e) Fingertip bruising to the front or back of torso.
- (f) Bite marks.
- (g) Burns or scalds (unusual patterns and spread of injuries).
- (h) Deep contact burns such as cigarette burns.
- (i) Injuries suggesting beatings (strap marks, welts).
- (j) Covering arms and legs even when hot.
- (k) Aggressive behaviour or severe temper outbursts.
- (l) Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

## 19.8 **Emotional Abuse:**

- (a) The persistent emotional maltreatment of a learner such as to cause severe and adverse effects on the learner's emotional development. It may involve conveying to a learner that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the learner 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 learners. These may include interactions that are beyond a learner's developmental capability as well as overprotection and limitation of exploration and learning or preventing the learner participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing learners frequently to feel frightened or in danger, or the exploitation or corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a learner, although it may occur alone.

19.9 **Signs can be:**

- (a) Over reaction to mistakes.
- (b) Lack of self-confidence/esteem.
- (c) Sudden speech disorders.
- (d) Self-harming.
- (e) Eating disorders.
- (f) Extremes of passivity and/or aggression.
- (g) Compulsive stealing.
- (h) Drug, alcohol, solvent abuse.
- (i) Unwillingness or inability to interact with others.
- (j) Excessive need for approval, attention and affection.

19.10 **Neglect:**

- (a) The persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a learner 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 learner's basic emotional needs.

19.11 **Signs can be:**

- (a) Constant hunger.
- (b) Poor personal hygiene.
- (c) Constant tiredness.
- (d) Inadequate clothing.
- (e) Frequent lateness or non-attendance at the training centre.
- (f) Untreated medical problems.
- (g) Poor relationship with peers.
- (h) Compulsive stealing and scavenging.
- (i) Rocking, hair twisting and thumb sucking.
- (j) Running away.
- (k) Loss of weight or being constantly underweight.
- (l) Low self-esteem.

### 19.12 **Peer on peer abuse:**

- (a) Peer on peer abuse is behavior by an individuals or group of individuals which can be a one-off incident or repeated over time. Peer-on-peer abuse is behaviour that intentionally hurts another individual or group wither physically or emotionally. All peer-on-peer abuse is unacceptable and will be taken seriously. Peer on peer abuse can take on many forms including serious bullying (including cyberbullying), relationship abuse, domestic abuse, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and /or gender-based violence and is often motivated by prejudice against particular groups steered by a dislike for a person.

### 19.13 **Sign can be:**

- (a) Race
- (b) Religion
- (c) Gender
- (d) Sexual orientation
- (e) Special educational needs or disabilities
- (f) Where a child is adopted, in care or has care responsibilities
- (g) Is suffering from health problems
- (h) Has an actual or perceived difference (e.g. physical or cultural difference)

### 19.14 **Bullying and Harassment**

Bullying can include a variety of behaviors from one individual/group to another individual/group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way.

## 20. **Appendix 2: Specific Safeguarding Information for Staff (See Annex A of Keeping Children Safe in Education, 2023, 2024)**

### 20.1 **Children Missing Education**

- (a) The Childcare Company and Impact Futures recognise that all learners, regardless of their circumstances, are entitled to education which is suitable to their age, ability, aptitude, and any special educational needs they may have. The Childcare Company and Impact Futures is aware that a learner going missing from education is a potential indicator of abuse or neglect.
- (b) The Childcare Company and Impact Futures has a procedure in place for responding to unauthorised absence and for dealing with learners that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

### 20.2 **Child Sexual Exploitation (CSE)**

- (a) The Childcare Company and Impact Futures identifies that CSE involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.
- (b) The Childcare Company and Impact Futures are aware that sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation may involve varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexting, sexual bullying including cyberbullying and grooming. However, it is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abusive.
- (c) Every member of staff at The Childcare Company and Impact Futures recognises that learners at risk of CSE need to be identified and issues relating to CSE should be approached in the same way as protecting learners from other risks.

### 20.3 'Honour Based' Violence (HBV)

- (a) Members of staff at The Childcare Company and Impact Futures are aware that 'Honour-based' violence (HBV) encompasses a range of 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.
- (b) The indicators of HBV and associated factors will be covered with staff within the safeguarding training. All members of staff are alert to the possibility of a learner being at risk of HBV or already having suffered HBV. All members of staff are aware that all forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will speak with the DSL if they are concerned about HBV.
- (c) All members of staff will follow the business and LSCB procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### 20.4 Forced Marriage

- (a) The Forced Marriage Unit has published [Multi-agency guidelines](#), focusing on the role of schools, colleges and training providers. Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151.

### 20.5 Radicalisation

- (a) The Childcare Company and Impact Futures recognise that exposure of learners to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence.
- (b) Radicalisation of young people can be compared to grooming for sexual exploitation.
- (c) The Childcare Company and Impact Futures will ensure all staff complete an e-learning training package in conjunction with the College of Policing which includes guidance on how to identify people who may be vulnerable to being drawn into extremist ideology, and how to refer them into the Channel process.
- (d) Every member of staff at The Childcare Company and Impact Futures recognise that learners exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting learners from other risks.
- (e) All members of Staff should report concerns regarding radicalisation and extremism to the DSL who will follow local and national guidance.

## 20.6 County Lines

- (a) County Lines is the exploitation of young and vulnerable people through:
- (i) **Grooming & recruitment** – vulnerable children are targeted, befriended, given money, made to feel like a family and they belong, they have the things they've always wanted and then they are exploited.
  - (ii) **Property – Cuckooing** is when a vulnerable person has their property taken over by drug dealers and mules from outside of the county.
  - (iii) **Drugs** – the primary target is buying cheap drugs in major cities such as London, using vulnerable children and young people to cross several county lines to deal.
  - (iv) **Weapons** – more recently the movement of weapons has become another commodity.
  - (v) **Violence** – the children and young adults can't escape it, they are threatened, they experience violence, and they often go on to be perpetrators of violence.
  - (vi) **Sex** – whilst sexual exploitation is a risk, authorities hat those involved in County Lines are at no greater risk than other vulnerable children and young adults.
  - (vii) **Gangs** – once recruited these vulnerable children are gang members, it's highly likely they will remain in the gang, move up the ranks and become institutionalised gang members and possibly gang leaders of the future.
  - (viii) **Crime** – most fall into a life of crime, starting with small convictions and sentences, progressing to serious crime and serving time in jail – it's almost impossible for them to break the cycle.

20.7 When a young learner goes missing, and we don't know why and after all usual attempts to contact them, including through their parents and/or guardian, we need to consider the risk that they may have got caught up in County Lines and actually living outside of the area and in need of help. Not all people that go missing are involved in County Lines, but it is an ever-increasing problem across the UK.

## 20.8 Cyber bullying and e-safety

- (a) The safe and responsible use of technology is sometimes presented as primarily a child or vulnerable learner protection issue. Whilst children, young people and vulnerable learners do need support to keep themselves safe online because of the risks associated with the use of technology (e.g. internet, text, or video messaging, email, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them, there is also the mismanagement of personal data, risks of financial scams, identity theft, grooming and radicalisation.

## 20.9 Domestic Violence

- (a) Can be physical, emotional, sexual neglect. This category also covers forced marriages and honour-based violence. Some learners may experience issues with drugs or alcohol to self-medicate or via dependence.

## 20.10 Female Genital Mutilation (FGM)

- (a) Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted to them, so sensitivity should always be shown when approaching the subject. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the serious crime act 2015). The legislation requires staff to report where, during their professional duties, they either are informed by a girl under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girls physical or mental health or for purposes of labour or birth. For the purposes of the duty, the relevant age is the girl's age at the time of disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she has FGM when she was under 18).

## 20.11 Modern Slavery

- (a) Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

## 20.12 Sexting

- (a) This is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics' or 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in a relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image, and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many young people are not aware that they could be committing a crime offence under the sexual offence act 2003. Any direct disclosure by a learner (anyone that identifies themselves as Male, Female, non-binary) will be taken very seriously.



## 20.13 **Initiation/Hazing**

- (a) Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a school or sports team etc. Hazing can also be used as initiation into a street or other 'gang'. There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trial which promote a bond between them. After the hazing is over, the newcomers also have something common with older established members of the organisation or 'gang', because they have all experienced this as part of a 'rite of passage'. Many rituals involve humiliations, embarrassment, abuse and harassment.

## 20.a.2 **INCEL**

- a) Involuntary celibates (incels) are men who define themselves by their inability to form or access sexual relationships with women. They believe this is the combined result of genetic factors, evolutionarily determined traits in women, and inequitable social structures.
- b) Incels believe genetic factors influence their physical appearance and/or cognitive and social abilities to the extent that they are unattractive to women.
- c) Incels believe that women are evolutionarily predetermined to seek out mates through a process called hypergamy. Hypergamy is premised on the belief that women are more sexually selective, have a narrow view of attractiveness, and lower levels of promiscuity than men. This means women deliberately seek out the most conventionally 'attractive' mate, reject less attractive men, and remain single when an ideal mate is unavailable. Incels believe that prior to women gaining sexual and financial autonomy, hypergamy was restricted because of their reliance on a husband for physical and material security.
- d) Incels engage with violence at three basic tiers personal, interpersonal and societal.
- e) Personal violence is self-directed by incels through acts of self-harm, suicidal ideation or suicide.
- f) Interpersonal violence is violence between an incel and another individual, including physical assaults or murders targeting women, violence towards sex workers, and aggressive behaviour towards women in public.
- g) Societal violence is directed towards society as a whole this includes terror attacks or murders perpetrated by incels, as well as by individuals who do not identify as incels, but are celebrated by the incel community for their actions.

## 21. Appendix 3: Additional Advice and Support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
<b>Abuse</b>	What to do if you're worried a child is being abused <a href="https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2">https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2</a>	<b>DfE Advice</b>
<b>Abuse</b>	Domestic abuse: Various Information/Guidance <a href="https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2">https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2</a>	<b>Home Office</b>
<b>Abuse</b>	Faith based abuse: National Action Plan <a href="https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief">https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief</a>	<b>DfE Advice</b>
<b>Abuse</b>	Relationship abuse: Disrespect nobody <a href="https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/">https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/</a>	<b>Home Office</b>
<b>Bullying</b>	Preventing bullying including cyberbullying <a href="https://www.gov.uk/government/publications/preventing-and-tackling-bullying">https://www.gov.uk/government/publications/preventing-and-tackling-bullying</a>	<b>DfE Advice</b>
<b>Children in the courts</b>	Advice for 12-17 year old witnesses in criminal courts <a href="https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds">https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds</a>	<b>MoJ Advice</b>
<b>Children missing from education, home or care</b>	Children missing education <a href="https://www.gov.uk/government/publications/children-missing-education">https://www.gov.uk/government/publications/children-missing-education</a>	<b>DfE Statutory Guidance</b>
<b>Children missing from education, home or care</b>	Children missing from home or care <a href="https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care">https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care</a>	<b>DfE Statutory Guidance</b>
<b>Children missing from education, home or care</b>	Children and adults missing strategy <a href="https://www.gov.uk/government/publications/missing-children-and-adults-strategy">https://www.gov.uk/government/publications/missing-children-and-adults-strategy</a>	<b>Home Office Strategy</b>
<b>Children with family members in prison</b>	National Information Centre on Children of Offenders <a href="https://www.nicco.org.uk/">https://www.nicco.org.uk/</a>	<b>Barnardo's in partnership with HMP and HMPPS</b>
<b>Child Exploitation</b>	County Lines: criminal exploitation of children and vulnerable adults <a href="https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines">https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines</a>	<b>Home Office Guidance</b>
<b>Child Exploitation</b>	Child sexual exploitation: guide for practitioners <a href="https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners">https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners</a>	<b>DfE Advice</b>

<b>Child Exploitation</b>	Trafficking: safeguarding children <a href="https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance">https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance</a>	<b>DfE and HO Guidance</b>
<b>Drugs</b>	Drugs: advice for schools <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_schools.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_schools.pdf</a>	<b>DfE and ACPO Advice</b>
<b>Drugs</b>	Drugs strategy 2017 <a href="https://www.gov.uk/government/publications/drug-strategy-2017">https://www.gov.uk/government/publications/drug-strategy-2017</a>	<b>Home Office Strategy</b>
<b>Drugs</b>	Information and advice on drugs <a href="https://www.talktofrank.com/">https://www.talktofrank.com/</a>	<b>Talk to Frank Website</b>
<b>Drugs</b>	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention <a href="http://mentor-adepis.org/">http://mentor-adepis.org/</a>	<b>Website developed by Mentor UK</b>
<b>Harmful online challenges and online hoaxes</b>	This includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. <a href="https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes">https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes</a>	<b>DFE</b>
<b>“Honour Based Violence”</b>	Female genital mutilation: information and resources <a href="https://www.gov.uk/government/collections/female-genital-mutilation">https://www.gov.uk/government/collections/female-genital-mutilation</a>	<b>Home office</b>
<b>“Honour Based Violence”</b>	Female genital mutilation: multi agency statutory guidance <a href="https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation">https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation</a>	<b>DfE, DH and HO Statutory guidance</b>
<b>“Honour Based Violence”</b>	Forced marriage: statutory guidance and government advice <a href="https://www.gov.uk/guidance/forced-marriage">https://www.gov.uk/guidance/forced-marriage</a>	<b>Foreign Commonwealth Office and Home Office</b>
<b>Health and Well-being</b>	Fabricated or induced illness: safeguarding children <a href="https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced">https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced</a>	<b>DfE, Department for Health and Home Office</b>
<b>Health and Well-being</b>	Rise Above: Free PSHE resources on health, wellbeing and resilience <a href="https://www.pshe-association.org.uk/curriculum-and-resources/resources/rise-above-schools-teaching-resources">https://www.pshe-association.org.uk/curriculum-and-resources/resources/rise-above-schools-teaching-resources</a>	<b>Public Health England Resources</b>
<b>Health and Well-being</b>	Medical-conditions: supporting pupils at school <a href="https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3">https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3</a>	<b>DfE Statutory Guidance</b>
<b>Health and Well-being</b>	Mental health and behaviour <a href="https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2">https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2</a>	<b>DfE Advice</b>

<b>Homelessness</b>	Homelessness: How local authorities should exercise their functions <a href="https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities">https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities</a>	<b>MHCLG</b>
<b>Online</b>	Sexting: responding to incidents and safeguarding children <a href="https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis">https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis</a>	<b>UK Council for Child Internet Safety</b>
<b>Radicalisation / Terrorism</b>	Prevent duty guidance for Further Education (FE) <a href="https://www.gov.uk/government/publications/prevent-dutyguidance/prevent-duty-guidance-for-further-education-institutions-inengland-and-wales">https://www.gov.uk/government/publications/prevent-dutyguidance/prevent-duty-guidance-for-further-education-institutions-inengland-and-wales</a>	<b>DfE Guidance</b>
<b>Radicalisation / Terrorism</b>	Prevent duty guidance <a href="https://www.gov.uk/government/publications/prevent-duty-guidance">https://www.gov.uk/government/publications/prevent-duty-guidance</a>	<b>Home Office Guidance</b>
<b>Radicalisation / Terrorism</b>	Prevent duty advice for schools <a href="https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty">https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty</a>	<b>DfE Advice</b>
<b>Radicalisation / Terrorism</b>	Educate Against Hate Website <a href="https://educateagainsthate.com/">https://educateagainsthate.com/</a>	<b>DfE and Home Office</b>
<b>Violence</b>	Gangs and youth violence: for schools and colleges <a href="https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence">https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence</a>	<b>Home Office Advice</b>
<b>Violence</b>	Ending violence against women and girls 2016-2020 strategy <a href="https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020">https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020</a>	<b>Home Office Strategy</b>
<b>Violence</b>	Sexual violence and sexual harassment between children in schools and colleges <a href="https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges">https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges</a>	<b>DfE Advice</b>
<b>Violence</b>	Serious violence strategy <a href="https://www.gov.uk/government/publications/serious-violence-strategy">https://www.gov.uk/government/publications/serious-violence-strategy</a>	<b>Home Office Strategy</b>

## 22. Document control

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Signed 

Printed Name Becki Lee

Job Title Director of Quality – Safeguarding Lead

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