November 2024



# Safeguarding Policy & Procedure

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The following policy has been approved by the Senior Leadership Team.

The policy will be reviewed on an annuals basis unless circumstances arise requiring the policy to be reviewed earlier.

#### Approved by Senior Leadership Team: November 2024

#### Planned review: November 2025

# 1. Policy Overview

**1.1** TSL is committed to the well-being and development of all its learners. TSL recognises its contribution and duties towards safeguarding all its learners, especially those who are vulnerable. At TSL we are committed to safeguarding our learners and we expect all our staff to share this commitment. Our staff take welfare concerns seriously and we encourage our learners to discuss concerns. We have developed an ethos of care and concern for our learners and staff.

**1.2** Safeguarding is a term used to describe the overall safety and well-being of an individual and for the purposes of this policy and set of procedures includes:

- Protecting children, young people and vulnerable adults from maltreatment and exploitation
- Preventing the impairment of children and young peoples' health and wellbeing
- Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care

1.3 TSL will strive to:

- Train, develop and support a trusting TSL ethos, so that learners communicate well with our staff and representatives
- Be proactive in ensuring the safety of young people and vulnerable adults
- Provide clear information, instruction, guidelines, and procedures for **all staff** so that they can respond appropriately to any safeguarding concerns
- Develop and deliver a staff training package which keeps **all staff** up-to-date with procedures and safeguarding issues and evaluate its effectiveness in meeting this objective
- Offer support to staff and learners who have any safeguarding concerns (including referral to external agencies where this is deemed appropriate)
- Act promptly and diligently on any safeguarding concerns
- Liaise with the appropriate key partners and develop collaborative working practices which facilitate and promote the safeguarding of children and vulnerable adults both within TSL and within the wider community.

**1.4** This policy will be revised, monitored, and implemented in following consultation with partners and will be reviewed annually. **If we are delivering training as part of a sub-contract, we will follow the Lead Contracts referral process for Safeguarding.** 

# 2. Purpose

**2.1** The purpose of this policy is to ensure total commitment from our staff, learners, stakeholders in respect of the safeguarding requirements and arrangements currently in place at TSL. This policy provides information relating to our organisational commitment and individual roles, responsibilities, and procedures with respect to the safeguarding of children and vulnerable adults including our learners and stakeholders at TSL.

**2.2** The Policy and Procedures outlined in this document have been produced in accordance with and are fully compliant with the following legislation and guidance:

- Keeping Children Safe in Education 2022
- The Children Act 1989 and 2004
- Education Act 2002
- The Education (Health Standards) (England) Regulations 2003
- The Further Education (Providers of Education) (England) (Regulations) 2006
- The School Staffing (England) Regulations 2009 as amended by SI 2012/1740 and SI 2013/1940
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- The Children and Families Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Serious Crime Act 2015
- UK Council for Child Internet Safety (UKCCIS) published in August 2016: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

# 3. Scope

**3.1** The following policy and reporting procedures apply to <u>all</u> personnel working in and on behalf of the TSL (including volunteers, contracted employees and subcontracted provision and off-site delivery partners). TSL acknowledges that promoting safeguarding is the responsibility of all the staff. It will specifically focus on:

- Child protection
- Protection of Vulnerable Adults (PoVA)
- Safer recruitment
- Dealing with allegations and suspicions
- Dealing with an abuse of trust
- Safeguarding

# 4. Linked Policies and/or Procedures

4.1 Staff should also be fully aware and compliant with the requirements of TSL's:

- Learner Anti-Bullying Policy
- Health and Safety Policy
- Acceptable Use Policy
- Staff Whistleblowing Procedure
- Data Protection Policy
- Equality and Diversity Policy
- Completing Guidance CF1 (Appendix 5)

# 5. Definitions

**5.1** Any reference to a **child** in this policy includes, in addition to a person under the age of 18, a person aged 18, 19 or 20 who (a) has been looked after by a local authority at any time after attaining the age of 16 or (b) has a learning disability. This complies with recommendations given in the DfES document **"Safeguarding Children in Education**" (2004) Paragraph 9 (2)

5.2 A Vulnerable Adult is someone who is aged 18 or over and:

- Is unable to protect him or herself against significant harm or exploitation
- Is or may be in need of community care services by reason of mental or other disability, increasing frailty or illness
- Is or may be unable to take care of him or herself

**5.3** TSL also acknowledges that specific social or cultural groups of people may also be at greater risk of harm and will therefore be more vulnerable, such as (but not exclusively):

- Those young people who are in or leaving public care
- Asylum seekers who are under 18 and/or who are independent from their parents
- Those who are under the supervision of the youth offending or probation service
- Individuals with protected characteristics under the Equality Act 2010 Age, Disability, Sex, Race, Religion, Sexual orientation, Gender reassignment, Marriage/civil partnership, Pregnancy/maternity

# **Categories of Abuse or Harm for children and vulnerable adults are listed in Appendix 6**

# 6. TSL Commitment

(As stated in **KCSIE** 2022, All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction).

**6.1** TSL will ensure the following commitments are made on behalf of our learners and staff:

- Staff will be trained and informed of the relevant procedures which are in place and how these must be followed if they become aware of a safeguarding issue.
- Our Safeguarding Policy and related Procedures will be made easily accessible and will be available both electronically and in paper format.
- Appropriate reporting processes and supporting documentation will be easily accessible in both electronic and in paper format.
- A member of staff will be nominated to act as a link person for co-ordinating and liaising with other agencies (DSL). Other staff will be named as key contacts with regard to safeguarding issues and these names will be circulated to all staff and will be easily accessible (DSO). These staff will receive specific training and guidance in this area.
- Appropriate training will be delivered to all staff to ensure they are aware of the procedures to be followed, as well as the importance of the TSL's Confidentiality and Disclosure Policy and other related policies named on page 2 of this document.
- Training will also ensure that all staff are aware of a range of safeguarding issues, including health-related risky behaviours and will seek to develop the skills of staff in identifying and supporting learners with these issues.
- Thorough risk assessments will take place which cover the range of TSL activities
- Resources will be allocated to improve the personal safety of learners and to improve their awareness of these issues through curriculum and enrichment activities

# 7. Information Sharing

**7.1** TSL Data Protection Policy will provide full guidance. However, the following act as general principles.

#### TSL staff cannot offer absolute confidentiality to learners.

- Information may need to be shared only with nominated members of staff, if:
- i. a young person or vulnerable adult is at risk of harm or of harming others
- ii. a young person or vulnerable adult has made a clear serious breach of TSL Acceptable Behaviour Procedure
- iii. there is information that a learner under the age of 18 is being abused

- iv. there is information that a learner with a learning difficulty or disability of any age is being abused
- v. an individual may present a risk to children, young people, or a vulnerable adult
  - If a member of staff finds themselves in a "disclosure" situation with a learner, they should inform the learner as soon as possible that they have a duty to follow TSL procedures and inform an appropriate person.
  - Staff should not discuss safeguarding concerns with other colleagues, friends, or family. This information is strictly confidential and should only be discussed with nominated members of the team as stated above on a need-to-know basis.
  - If at any time a member of staff is unsure of who they can share confidential information with, they should discuss this with one of Safeguarding Team:

DSL – David MasonDSO - Tracy Ambrose -Designated Safeguarding LeadDesignated Safeguarding Officer

**7.2** TSL keeps information about staff, learners, and other parties to allow it to operate as a successful organisation and meet its legal obligations. To comply with the Data Protection Act 1998 ("the Act), information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, TSL must comply with the Data Protection Principles in the Act.

**7.3** Where there are concerns that a child, young person or vulnerable adult is, or may be, at risk of significant harm, their needs must always come first. The priority must always be to safeguard the child, young person, or vulnerable adult.

### 8. Safer Recruitment of Staff

TSL is committed to safeguarding and promoting the welfare of children and young people and expects all staff, sub-contractors and volunteers to share this commitment. Our HR, Safeguarding & Management team have been trained in Safer Recruitment Procedures.

**8.1** The Recruitment Procedure is designed to assist managers to recruit and select the best candidates for a vacancy and takes account of all relevant legislation including the Safeguarding Children and Safer Recruitment in Education Guidance. These Policy and Procedures will be regularly updated as vetting and barring arrangements develop in order to ensure we not only meet our legal duties but go beyond compliance whenever possible to further reduce the risk of harm.

#### **Prior to interview**

All candidates are required to complete the TSL Application Form, including reasons for any gaps in employment.

#### **Interview Stage**

All candidates are required to complete and hand in a Disclosure and Barring Service (DBS) form prior to interview. Identity is checked at this stage and Right to Work in the UK documentation.

In addition to assessing the applicant's suitability for the particular post, the interview panel will also ensure that the candidate understands the requirement for a DBS check and will explore:

- The candidate's attitude towards children and young people
- Gaps in employment history

#### Confirmation of offer

Verbal confirmation regarding the outcome of the interview will be communicated within 48 hours of interview and should the interview fall on a Friday, notification will be within 72 hours.

Confirmation will be made in writing to the successful candidate within three working days. The following will take place:

- DBS Barred List checks (subject to role) (formerly known as CRB and List 99 checks)
- DBS application form sent to DBS
- References requested from the successful candidate's referees

All job offers will be conditional subject to obtaining two satisfactory references, a satisfactory DBS clearance, medical clearance, qualifications check, right to work check and a three, six, nine or twelve month probationary period depending upon whether it is a business support or lecturing position.

8.2 Where the candidate is found to:

- be barred from working with children or adults
- have provided false information, on or in support of, his or her application or
- there are serious concerns about an applicant's suitability to work with children, young people or vulnerable adults,
- the facts will be reported to the Disclosure and Barring Service.

#### 8.3 Record Keeping

TSL will keep all safeguarding records, including those for vulnerable adults as stated in appendix 5. We will:

- Keep clear, detailed, written records of concerns about children, young people or vulnerable adults (noting the date, event and action taken) even where there is no need to refer the matter to Children's or Adult's Social Care (where applicable)
- Ensure all records clearly indicate statements of fact, opinion and second or third hand information
- Ensure all records are kept secure and in protected locations with access/ permissions set appropriately.

# 9. Levels of Need Framework and Liaison with other Agencies

**9.1** In order to effectively contribute to the Levels of Need Framework, TSL will actively participate in and contribute to the development of a common assessment of the needs of a child/young person/family.

**9.2** TSL will work to develop effective links with other services and agencies and co-operate as required with their enquiries regarding child and vulnerable adult protection matters. This includes attendance at case conferences, core groups, strategy meetings, review conferences and the submission of written reports where required.

# 10. Monitoring

**10.1** A formal report will be submitted to the Board of Directors on a quarterly basis detailing the number of interventions and, if appropriate, outcomes of interventions. The report will be limited in its content to ensure the protection of those involved.

**10.2** As a minimum, a summary report will be submitted to Board of Directors on an annual basis and will provide:

- an overview of the interventions for the previous year
- a summary of staff development activities and attendance at events
- a summary of activities which promote safeguarding themes to learners and raise their awareness
- key safeguarding-related developments for the previous year

# **11. Procedures**

#### 11.1 Dealing with a Child or Vulnerable Adult Protection Issue

All staff must be vigilant in matters relating to safeguarding learners. Staff may find themselves having a suspicion about a learner's safety or may have to deal with an actual disclosure.

For the purposes of these procedures, a **suspicion** is considered to be based on serious concerns about an individual's well-being. This might include changes in an individual's behaviour (including becoming withdrawn, displaying extremes of emotion, inappropriate behaviour and language) and appearance (including bruising, marks, weight loss, generally looking unkempt). A **disclosure** would be a situation where you are presented with an **allegation** or information which gives you reason to believe that an individual is or is likely to be at risk of significant harm.

TSL has identified key personnel who will provide guidance.

#### 11.2 Designated Safeguarding Team

**David Mason** as Lead Safeguarding Officer (DSL) **Tracy Ambrose** as Safeguarding Officer (DSO)

Role requirements:

- To provide clear, concise and accurate advice to staff & learners with safeguarding concerns.
- To deal with safeguarding issues and concerns in line with procedures.
- To involve external agencies where required/appropriate.
- Maintain accurate records of all reported safeguarding concerns.

The Designated Safeguarding Lead is responsible for safeguarding and child protection at Training Strategies Ltd. The key role of the Designated Safeguarding Lead is to:

- Manage referrals from school staff or any others from outside the school; work with external agencies and professionals on matter of safety and safeguarding.
- Undertake training; raise awareness of safeguarding and child protection amongst the staff and parents.

Staff who have a safeguarding concern should contact the Safeguarding Team. The staff member will be given advice about safeguarding relating to the case and guidance on how to accurately and factually record the allegation or suspicion.

#### Training (responsibility of DSL)

The key training elements are:

- Induction Training Mandatory
- DSLs attend training every two years; and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.
- All other staff will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Safer Recruitment training is available to all relevant staff and senior managers who are involved in the recruitment process.

### Please see Appendix 1 for guidelines for dealing with a suspicion and Appendix 2 for guidelines for dealing with an allegation.

The Executive Team Chair will be informed of all serious Safeguarding matters

#### by the Lead Safeguarding Officer within a working day.

#### **11.3** Dealing with Allegations made about a Member of Staff

Allegations against a member of staff must be taken seriously.

Any allegation against a member of staff must be reported **directly to the Managing Director immediately** and must not be discussed with any other member of staff or person outside TSL. In the **Managing Director's** absence, contact can be made with any other member of the SLT. **Please see Appendix 4 which provides full guidance on the procedures to follow.** 

Where an allegation is unfounded or is a matter for disciplinary action, then TSL's own procedures will be followed.

#### 11.4 Dealing with other Safeguarding Issues

In the first instance, any other safeguarding concerns should be discussed with your line manager.

### **APPENDICES**

- **Appendix 1** Procedures for Dealing with a Suspicion (Children, Young People and Vulnerable Adults)
- **Appendix 2** Procedures for Dealing with an Allegation (Children, Young People and Adults)
- **Appendix 3** Procedure for Designated Safeguarding Lead when dealing with a Suspicion or Allegation

**Appendix 4** - Procedure for Dealing with an Allegation Relating to Abuse of Trust by a Member of Staff

- **Appendix 5** CF1 Form and Safeguarding Tracker
- Appendix 6 Categories of Abuse or Harm
  - (i) Children
  - (ii) Vulnerable adults

Appendix 7 - Other Areas of Safeguarding Concern

- (i) Further Information on Child Sexual Exploitation and Female Genital Mutilation
- (ii) Honour Based Violence
- (iii) Sexual violence and sexual harassment between children in schools and colleges

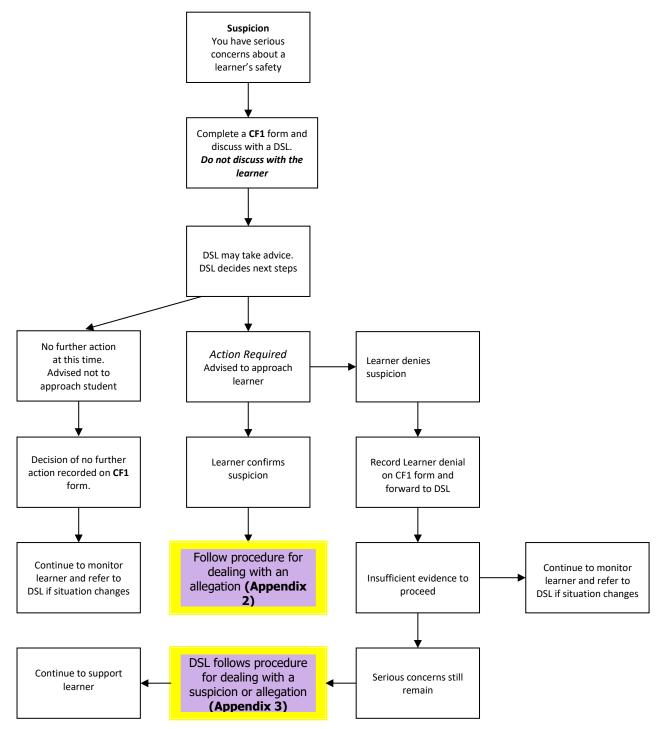
**Appendix 8** - Prevent and Channel Programme

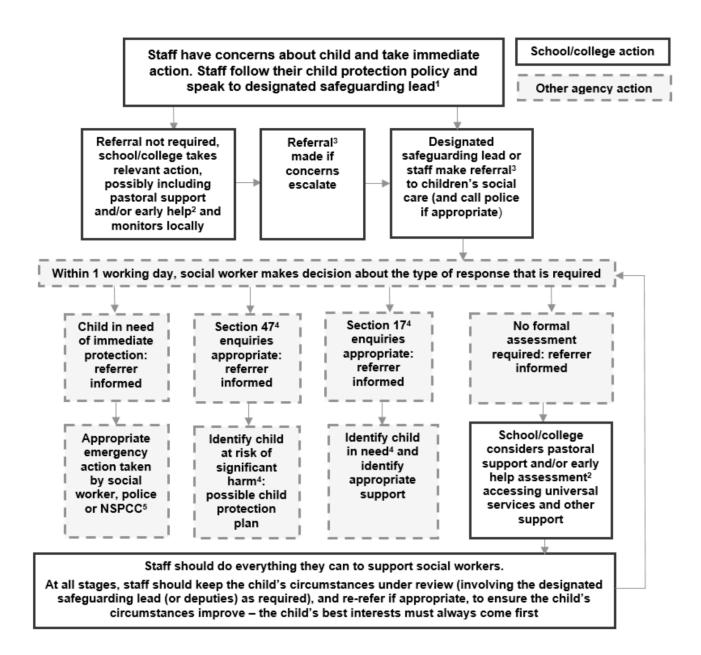
**Appendix 9** - Procedure for Dealing with an Online Safety Concern

# Appendix 1 - Procedures for Dealing with a Suspicion (Children, Young People and Vulnerable Adults)

### It is of paramount importance to preserve the privacy of the learner whilst still taking protective action.

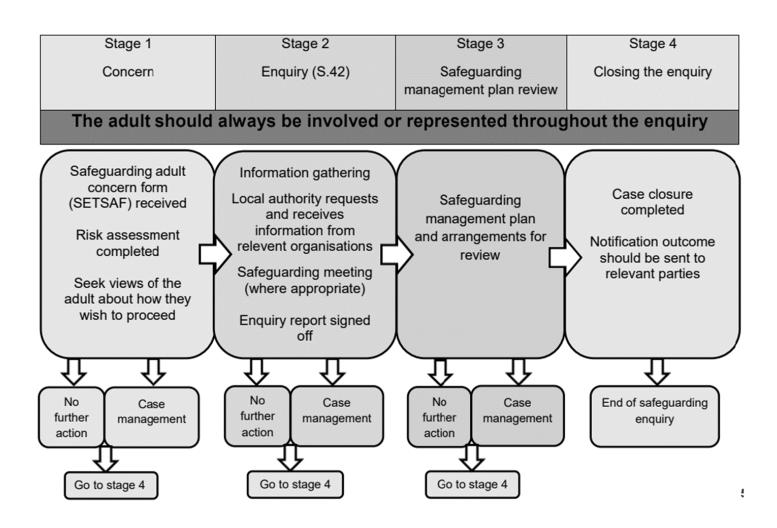
In an emergency (e.g. Where there is the risk or evidence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted. If a crime has been committed or is suspected, the police must be contacted immediately. TSL staff to follow the below:





Keeping Children Safe in Education 2022

Actions where there are concerns about Vulnerable Adults

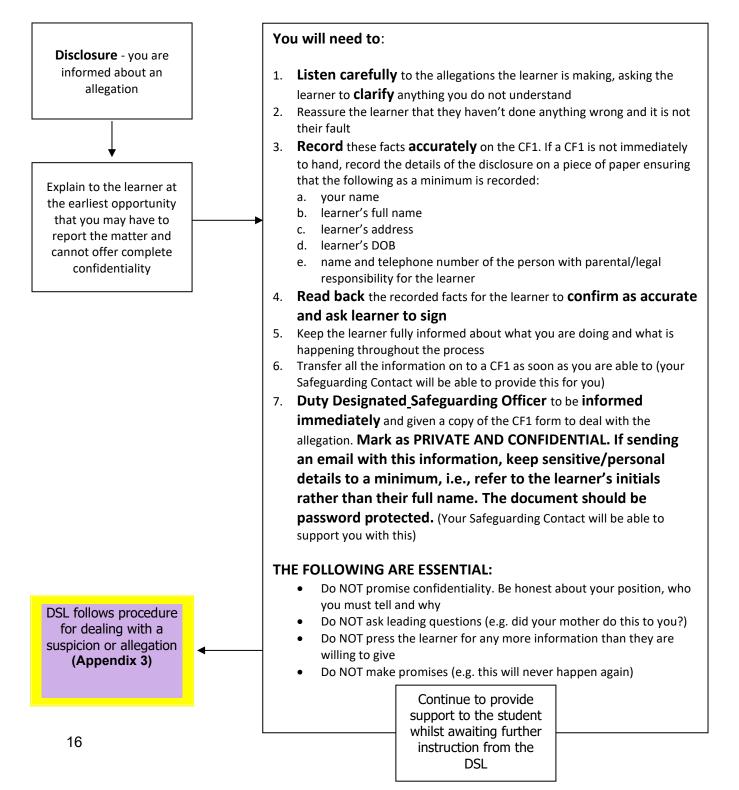


Care Act 2014

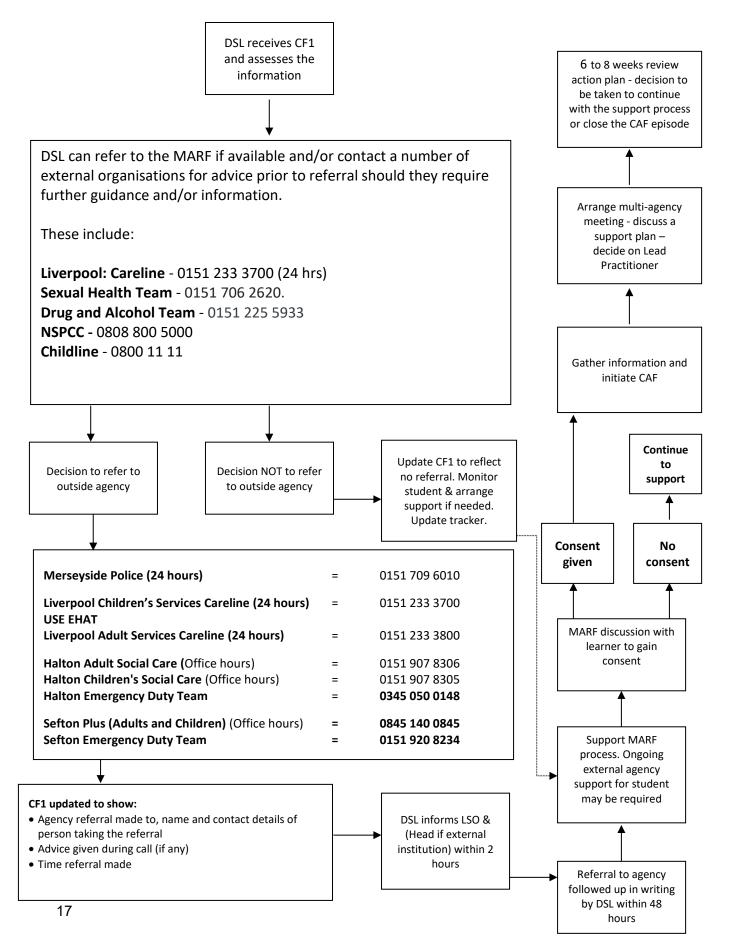
# Appendix 2 - Procedures for Dealing with an Allegation (Children, Young People and Adults)

## It is of paramount importance to preserve the privacy of the learner whilst still taking protective action.

In an emergency (e.g. where there is the risk or evidence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted. If a crime has been committed or is suspected, the police must be contacted immediately.



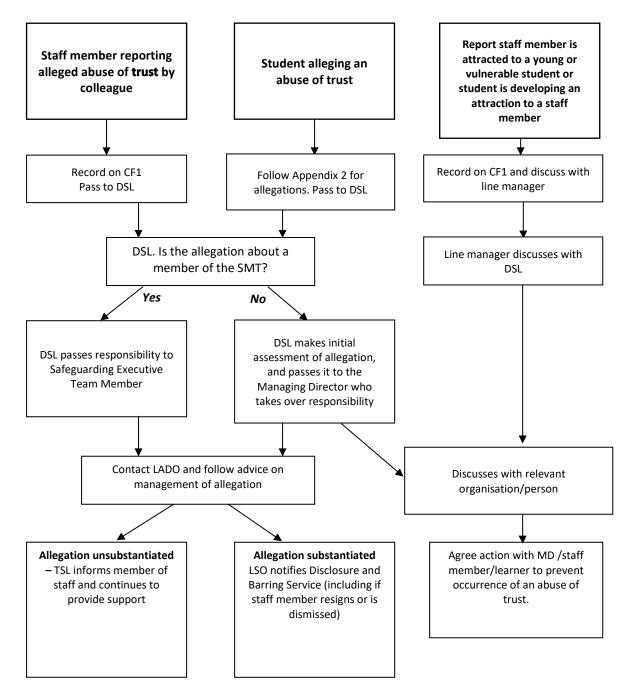
# Appendix 3 - Procedure for Designated Safeguarding Lead when dealing with a Suspicion or Allegation



# Appendix 4 - Procedure for Dealing with an Allegation Relating to Abuse of Trust by a Member of Staff

Abuse of a position of trust is defined as sexual activity with a child under 18 years or other vulnerable adult.

Staff members are deemed to include volunteers, contractors, etc.



Throughout the procedure, staff who is alleged to have abused their trust should be supported. This may involve a referral to internal or external counselling services, occupational health, other relevant professional support services or support from Human Resources.

#### Appendix 5 - CF1 Form and Safeguarding Tracker

TSL staff cannot offer	<b>Concern For</b> absolute confidentiality to le nominated staff in line with	<u>m</u> carners as information may	y need to be	ate Give		ut this concern?	Yes No
Please complete this	form if you have any conce	rns about a learner or mer	mber of			Actions Taken	
your team.	ionin in you have any concer	about a redifier of file	Da	ate	Staff	Action	DSL signature to clos
Learner Name:							
Date:	Date	of birth:					
Time:	Date	Closed:					
Staff Name(s):							
Please provide as mu	ih detail as possible:						
		Date:					

The **CF1** document is password protected with a basic code and staff will be directed by **DSL** – David Mason or **DSO** – Tracy Ambrose of the password when required to send it via email using the safeguarding email - <u>safeguarding@trainingstrategies.co.uk</u>

When DSL or DSO receive a CF1 form and assesses the information. Ongoing monitoring will be updated on the CF1 form. A summary is monitored through individual trackers for each area of the organisation. Any safeguarding concern can only be signed closed by the DSL.

#### Apprenticeship Tracker – DSL/DSO to update

	d <sup>D</sup> Training Strategies Apprenticeship Safeguarding Tracker												
Ref No		Learner Name		Address (Including postcode)		Does the learner have any protected characteristics (Consider Impact)			Details of any agencies supporting the learner (eg Social Worker, LAC Officer, etc)	Additional Support Required	Action		

#### Traineeship Tracker - DSL/DSO to update

	D <sup>C</sup> Training Strategies Traineeship Safeguarding Tracker												
Ref No	Password	Learner Name		Address (including postcode)		Does the learner have any protected characteristics (Consider Impact)	Staff Name		Details of any agencies supporting the learner (eg Social Worker, LAC Officer, etc)		Action		
											<u> </u>		

#### Classroom Tracker - DSL/DSO to update

	D <sup>D</sup> Training Strategies Classroom Safeguarding Tracker										
Ref No	Password	Learner Name		Address (Including postcode)		Does the learner have any protected characteristics (Consider Impact)	Staff Name		Details of any agencies supporting the learner (eg Social Worker, LAC Officer, etc)	Additional Support Required	Action

#### Staff Tracker - DSL/DSO to update

	6 <sup>10</sup> Training Strategies Staff Safeguarding Tracker													
Ref No	Password	Learner Name	DOB		Information	Does the learner have any protected characteristics (Consider Impact)	Staff Name		Details of any agencies supporting the learner (eg Social Worker, LAC Officer, etc)	Additional Support Required	Action			

#### Appendix 6 - Categories of Abuse or Harm

Abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act or neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can happen in any relationship and result in significant harm to, or exploitation of, the person subjected to it. *(DoH, 2000)* 

As well as the definitions outlined below a learner may be deemed to be neglected or abused if someone fails to act in order to prevent harm. These categories apply to both children and vulnerable adults and are as follows:

#### (i) Children

#### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a young or

vulnerable person. "Munchausen Syndrome by Proxy" may also constitute physical abuse, whereby a parent or carer feigns the symptoms of, or deliberately causes ill health in a child.

#### **Psychological or Emotional Abuse**

This is the persistent psychological or emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's psychological development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of psychological or emotional abuse is involved in all types of ill treatment of a child, although this abuse can occur in isolation.

#### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

#### Neglect

Neglect is the persistent failure to meet a child's basic physical and psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

#### (ii) Vulnerable Adults

#### **Physical Abuse**

Physical abuse may involve hitting, slapping, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint, or inappropriate sanctions.

#### **Sexual Abuse**

This includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting. Sexual abuse can occur between people of the same sex, and it can also occur within a marriage or any long-term relationship. A relationship of trust should exist between a member of staff or a volunteer and the person for whom they are caring. It would be seen as a betrayal of that trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person they are caring for.

#### **Psychological Abuse**

This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

#### **Financial or Material Abuse**

This may include theft, fraud, exploitation, or pressure in connection with wills, property, enduring power of attorney, inheritance, or financial transactions. This also includes the inappropriate use, misuse or misappropriation of property, possessions, or benefits. Typical signs may be loss of jewelry or personal property; lack of money to purchase basic items; inadequate clothing; loss of money from wallet or purse, etc.

#### Neglect and Acts of Omission

This may include the deliberate withholding of or failure to provide the help or support a person needs to carry out activities of daily living. It includes the failure to provide appropriate intervention or support to help a person, who does not have the capacity to assess risk or to deal with situations which are dangerous for them or others.

#### **Discriminatory Abuse**

This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation (DoH, 2000). Recognised signs may be very similar to psychological and emotional abuse.

#### Self-Neglect

This is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who place him/herself at risk in this way

#### **Appendix 7 - Other Areas of Safeguarding Concern**

- Risky/unusual behaviours
- Drug or alcohol misuse
- Unsafe sexual activity
- Involvement in relationships which may cause concern
- Use of manipulation or coercion into unsafe practices or risky situations
- Potentially dangerous environments, e.g., workshop
- Forced marriages and honour-based violence.
- Radicalisation where vulnerable individuals being targeted for recruitment into extremism
- FGM
- E-Safety Cyber-bullying

# Further Information on Child Sexual Exploitation and Female Genital Mutilation (KCSIE 2022)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual

images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

# Staff should be aware of the key indicators of children being sexually exploited which can include:

- going missing for periods of time or regularly coming home late.
- regularly missing school or education or not taking part in education.
- appearing with unexplained gifts or new possessions.
- associating with other young people involved in exploitation.
- having older boyfriends or girlfriends.
- suffering from sexually transmitted infections.
- mood swings or changes in emotional wellbeing.
- drug and alcohol misuse; and displaying inappropriate sexualised behaviour.

### Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

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 the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication as stated in (*KCSIE 2022*).

#### There are three main types of Child Sexual Exploitation CSE:

**Inappropriate relationships:** Usually involves just one abuser who has inappropriate power – physical, emotional, or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

**Partnerships:** Abuser groom's victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centers. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

**Organised exploitation and trafficking:** Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship. (**KCSIE 2022**)

**Female Genital Mutilation (FGM):** professionals in all agencies and individuals in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM and if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. The HM Government Multi-Agency Practice Guidelines are to be followed and local safeguarding procedures activated where suspicions may be confirmed.

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. **(KCSIE 2022)** 

#### **Honour Based Violence**

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

#### Staff should be aware of the importance of:

• Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

• All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. (KCSIE 2022)

#### **Appendix 8 - Prevent and Channel Programme**



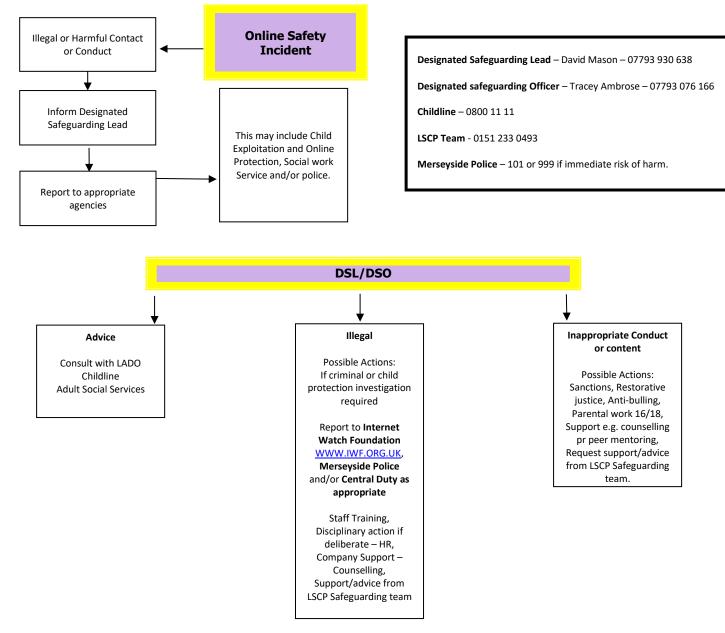
**Prevent and Channel Programme - Guidance** 

Prevent is the Government's strategy to stop individuals of any age who are at risk of being exploited becoming involved in violent extremism or supporting terrorism, in all its forms. We have a duty to 'prevent people being drawn into terrorism' known as the '**Prevent Duty'** using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

If you believe that someone is vulnerable to being exploited or radicalised, please contact **TSL'S Designated Safeguarding Lead** – David Mason who will contact the local authority Prevent Coordinator. **Channel** Tel: 0151-777-8383 Email: Channel@merseyside.police.uk **Merseyside Police Prevent Team** Tel: 0151 777 8506 **Liverpool Local Authority Prevent Coordinator** Tel: 0151-233-4187 <u>Prevent Safeguarding Team - Liverpool City Council</u> **National Police Prevent advice line** 0800 011 3764

#### Appendix 9 - Procedure for Dealing with an Online Safety Concern



# UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people

In the latest advice for schools and colleges (UKCCIS), sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18-year-olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

We recognise that some learners will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt accordingly.

# At TSL we believe that all learners have a right to attend and learn in a safe environment. Learners should be free from harm by adults and other learners.