

Activate Management Ltd – Child Safeguarding Policy

Policy Introduced:

January 2006

Policy reviewed annually, most recent review:

Feb 2020 – Adopted & endorsed by senior management team 24/02/2020

Policy Reviewed by:

Dom Taylor (Operations Director / DSL)

For the purpose of this document and for Activates safeguarding policies and procedures, children are defined as: “Any person under the age of 18 years”

Key contact details:

Our Designated Safeguarding Lead (National) whose role is defined as:

- Responsible for the overall safeguarding policy and procedures including ensuring that all staff receive effective training.
- Responsible for overseeing the reporting of safeguarding incidents across programmes and liaising with external bodies as required.

This is:

Dom Taylor – dom@we-activate.co.uk 0121 227 4385

Our Trained Designated Safeguarding Officers (National & Regional as identified) roles are:

- Responsible for regional delivery of safeguarding policies & procedures, staff training & supervision, & implementation of the required policies & procedures.
- Regional support mechanism for the reporting and management of safeguarding issues raised, including liaison with LSCB as required.

These are:

Oliver Uffindall (NCS Director – National)

oliver@we-activate.co.uk 0121 227 4385

Laura Turner (Customer Services Manager - National)

laura@we-activate.co.uk 0121 227 4385

Sarah Bell – (Regional Manager – South West / South East

sarah@we-activate.co.uk 0121 227 4385

Sammi Woodward – (Regional Manager – East Midlands / East / West Midlands)

sammi@we-activate.co.uk 0121 227 4385

External Contacts

In the event of none of the above being available an appendix of suitable and related external contacts can be found as an appendix at the end of this policy.

Legislation and relevant guidance:

Activate is committed to ensuring that policies and procedures remain up to date and are reflective of current legislation and guidance, currently including:

The Children Act 1989 & 2004 (as amended)

Children and Social Work Act 2017

Safeguarding Vulnerable Groups Act 2006

Protection of Freedoms Act 2012

Working together to safeguard children 2018

Keeping children safe in education 2018

Childcare act 2006 (as amended in 2018)

Prevent Duty

Female Genital Mutilation Act 2013

Sexual Offences Act 2003

Modern Slavery Act 2015

Policy Statement

Activate Management Ltd provides sport and activity to children aged between 4.5 – 17 years old in a variety of settings and venues across the UK. This is delivered primarily in day camps or residential activities but also extends to delivery of the NCS programme.

Under UK guidance a child is anybody under the age of 18.

Activate acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and Ofsted and any other regulatory body requirements. Activate is committed to working with all relevant partners and statutory bodies to ensure that safeguarding policies and procedures are met and legislation complied with.

This document can be viewed alongside other Activate policies and procedures which contribute to the overall strategy to ensure the safeguarding of children and adults remains paramount.

The additional documents include:

- Safeguarding Policy – Adults
- Safeguarding Methods
- NCS Duty of Care
- Equality & Diversity
- Anti-Bullying Procedure
- Whistle Blowing Policy
- Safer Recruitment Policy
- Anti-trafficking and slavery policy
- Working with children and young people code
- Prevent Policy
- Mobile & Social Media Guidance/E-Safety Policy
- Staff Code of Conduct – Appendix
- Complaints Policy

This policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio economic background, all children.

- Have a positive and enjoyable experience at all Activate activities in a safe and child centered environment.
- Are protected from abuse whilst participating in programmed sessions or outside of the activity whilst the child is in our care. There are four primary categories of abuse (Physical, sexual, emotional, and neglect); in addition to these we also take account of “Bullying” as a form of abuse. Definitions of these can be found within the “Safeguarding Procedures” section of the Parents information at <https://www.activatecamps.co.uk/parents-information>.

Activate acknowledges that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy Activate will:

- Promote and prioritise the safety and wellbeing of children and young people.
- Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people.

- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern.
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.
- Prevent the employment/deployment of unsuitable individuals
- Ensure robust safeguarding arrangements and procedures are in operation.

The policy and procedures will be widely promoted and are mandatory for **everyone** involved in Activate. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

This policy forms part of Activates' safeguarding procedures, there are additional specific procedures in place for use in instances of bullying and for 'Peer on Peer' abuse as referenced in the Governments Safeguarding Children in Education document.

Activate Staff and their role in reducing incidents

Activate recognises the need to ensure that staff are provided with the necessary skills to deliver high quality programmes. Activate is also committed to ensuring that they can embed the following principles into their work.

- A culture of listening to vulnerable groups to be embedded.
- Safe working practice for working with vulnerable groups which help to protect children and staff and volunteers and reduce the risk of allegations being made.

Scope

The following types of abuse are covered within this policy and within training provided to staff:

- Domestic Abuse
- Sexual Abuse
- Neglect
- Online Abuse
- Physical Abuse
- Emotional Abuse
- Child Sexual Exploitation
- Female Genital Mutilation (FGM)
- Bullying and Cyber Bullying
- Child Trafficking
- Grooming

- Harmful Sexual Behaviour
- Financial or Material Abuse
- Modern Slavery
- Discriminatory Abuse
- Radicalisation / Extremism ('Prevent')
- Peer on Peer (Contextualised Safeguarding)

Training

- All staff will be trained on safeguarding, including responsibilities surrounding 'Prevent', 'Cyber Safety', and 'Modern Slavery' • Staff will be trained on how to monitor and how to report safeguarding issues including a clear chain of command and reporting process (Contained in "Safeguarding Methods")
- Training will be reviewed regularly (at least annually and/or when legislation or guidance changes)
- Staff training is recorded on the Activate Staff training portal as well as within individuals training records.
- Staff training will reflect the requirements of our various partner organisations – these include but are not limited to, Ofsted, The NCS Trust, Pharos, The NSPCC, Government bodies.

Monitoring

The policy will be reviewed annually, or in the following circumstances:

- Changes in legislation and/or government guidance
- As required by the Local Safeguarding Children Board, UK Sport and/or Home Country Sports Councils and Ofsted
- As a result of any other significant change or event.

This policy is our general statement on child safeguarding and welfare. This policy should be viewed along with the additional policies and procedures related to Activate and our activities as identified above.

Reporting

- Activate includes safeguarding and all aspects associated within this document/policy as requiring to be reported.
- Safeguarding issues must be reported to the regional safeguarding lead and all safeguarding concerns will be investigated fully and recorded.
- Safeguarding issues or suspicions will also be reported to external bodies as required within safeguarding legislation, best practice, and statutory requirements.
- Staff are trained on their responsibilities including what and when to report, and methods of reporting.

Activate has assigned the following person as our designated safeguarding lead:

Dom Taylor (Operations Director) – dom@we-activate.co.uk 0121 227 4385

Definitions and Coverage

Definitions of the types of abuse, together with signs and symptoms are included in the attached appendix.

Staff are made aware of the need to report allegations of abuse including those that may not have occurred whilst in the care of Activate (Historical allegations of abuse).

Safeguarding Procedures Background

Activate acknowledges the importance of protecting children from abuse. All complaints, allegations or suspicions are taken very seriously. We will not promise confidentiality as the matter may develop in a way that this cannot be honoured, however, we have strict guidelines on sharing information, which we adhere to.

Whistle Blowing

Activate has a separate Whistle Blowing procedure on which staff have been trained and in which are contained separate whistle blowing procedures.

Staff are made aware of their statutory requirements for safeguarding and the requirement to report all safeguarding concerns. As a result this policy and procedures take precedence over all other procedures in the event of a safeguarding concern or disclosure.

DBS Referrals

Activate recognises its responsibilities surrounding the legal requirement and best practice advice to make referrals to the DBS if the recognised conditions are met.

Activate uses the government provided information on how to make referrals as well as using the online referral form as and when required. This information can be found at

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>.

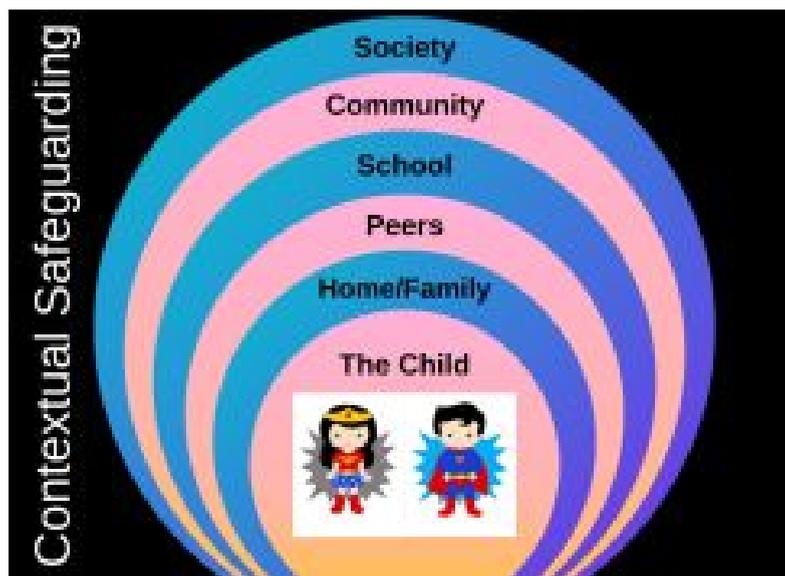
All safeguarding staff at Activate are aware of these responsibilities and the process which must be followed. The process used and further details are contained as an appendix at the end of this policy.

Referrals will only be made in line with the guidance provided by the UK Government including the specific advice of whether to make a referral when

an allegation is made, or when someone is temporarily suspended. Referrals will be made by one central contact at Activate (Normally the head of recruitment, under supervision and with guidance from the Operations Director).

Contextualised Safeguarding

It is recognised that safeguarding issues can manifest themselves from a variety of sources and that staff should be aware of the many factors in a Child's life that influence their behaviours, affect their experiences, and can be the source of safeguarding trouble and concerns.



Appendix 1 – Safeguarding Background

Forms of abuse:

The following information identifies the different forms of abuse defined by the NSPCC in 2015 and for which Activate staff will be trained in recognizing and reacting to any suspicions. This list has been extended to incorporate additional types of abuse identified within adult safeguarding, and the “Keeping Children Safe in Education” document 2018.

Child Abuse

Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. Increasingly it can happen online.

Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse.

It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships. Domestic abuse can seriously harm children and young people.

It's often difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around.

Children who witness domestic abuse may:

- Become aggressive
- Display anti-social behaviour
- Suffer from depression or anxiety
- Not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

Sexual Abuse

A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact, and it can happen

online. Sometimes the child won't understand that what's happening to them is abuse. They may not even understand that it's wrong.

There are two different types of child sexual abuse. These are called contact abuse and non-contact abuse.

Contact abuse is where an abuser makes physical contact with a child, including penetration.

Non-contact abuse covers other acts where the abuser doesn't touch the child, such as grooming, exploitation, persuading children to perform sexual acts over the Internet and flashing.

Children who are sexually abused may:

Stay away from certain people

- They might avoid being alone with people, such as family members or friends
- They could seem frightened of a person or reluctant to socialise with them.

Show sexual behaviour that's inappropriate for their age

- A child might become sexually active at a young age
- They might be promiscuous
- They could use sexual language or know information that you wouldn't expect them to

Have physical symptoms

- Anal or vaginal soreness
- An unusual discharge
- Sexually transmitted infection (STI)
- Pregnancy.

Neglect

Neglect is the on-going failure to meet a child's basic needs. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care.

A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents.

A child who's neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need. In some cases it can cause

permanent disabilities.

Neglect can be really difficult to identify, making it hard for professionals to take early action to protect a child.

Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. But if you notice multiple, or persistent, signs then it could indicate there's a serious problem.

Children who are neglected may have:

Poor appearance and hygiene, health and development problems, housing and family issues,

Online Abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyber bullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

A child may be experiencing abuse online if they:

- Spend lots, much more or much less time online, texting, gaming or using social media
- Are withdrawn, upset or outraged after using the internet or texting
- Are secretive about who they're talking to and what they're doing online or on their mobile phone
- Have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Physical Abuse

Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts.

It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, and slapped or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of

illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness (FII).

There is no excuse for physically abusing a child. It causes serious, and often long-lasting, harm – and in severe cases, death.

Bumps and bruises don't necessarily mean a child is being physically abused – all children have accidents, trips and falls.

There's isn't one sign or symptom to look out for that will say a child is definitely being physically abused. But if a child often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated.

Physical abuse may include signs of – bruising, burns or scalds, bite marks, fracture or broken bones, other injuries and health problems.

Emotional Abuse

Emotional abuse is the on-going emotional maltreatment or emotional neglect of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development.

Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them.

Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time – but this isn't always the case.

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions.

Changes in emotions are a normal part of growing up, so it can be really difficult to tell if a child is being emotionally abused.

Children may:

- Use language, act in a way or know about things that you wouldn't expect them to know for their age
- Struggle to control strong emotions or have extreme outbursts
- Seem isolated from their parents
- Lack social skills or have few, if any, friends

Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation.

Sexual exploitation can also happen to young people in gangs.

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Young people who are being sexually exploited may:

- Go missing from home, care or education.
- Be involved in abusive relationships, intimidated and fearful of certain people or situations
- Hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- Associate with other young people involved in sexual exploitation
- Get involved in gangs, gang fights, gang membership
- Have older boyfriends or girlfriends
- Spend time at places of concern, such as hotels or known brothels
- Not know where they are, because they have been moved around the country
- Be involved in petty crime such as shoplifting
- Have unexplained physical injuries
- Have a changed physical appearance, for example lost weight.
- They may also show signs of sexual abuse or grooming.

Female Genital Mutilation (FGM)

Female genital mutilation is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or Sunna.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.

There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about or you may become aware of:

- A long holiday abroad or going 'home' to visit family.
- Relative or cutter visiting from abroad.
- A special occasion or ceremony to 'become a woman' or get ready for marriage.
- A female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

A girl or woman who's had female genital mutilation (FGM) may:

- Have difficulty walking, standing or sitting.

- Spend longer in the bathroom or toilet.
- Appear withdrawn, anxious or depressed.
- Have unusual behaviour after an absence from school or college.
- Be particularly reluctant to undergo normal medical examinations.
- Ask for help, but may not be explicit about the problem due to embarrassment or fear.

FGM can be extremely painful and dangerous. It can cause:

- Severe pain
- Shock
- Bleeding
- Infection such as tetanus, HIV and hepatitis B and C
- Organ damage
- Blood loss and infections that can cause death in some cases.

Bullying and Cyber-bullying

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying that happens online, using social networks and mobile phones, is often called cyber bullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

It can be hard for adults, including parents, to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault.

You can't always see the signs of bullying. And no one sign indicates for certain that a child's being bullied. But you should look out for:

- Belongings getting "lost" or damaged.
- Physical injuries such as unexplained bruises.
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school.
- Not doing as well at school.
- Asking for, or stealing, money (to give to a bully).
- Being nervous, losing confidence, or becoming distressed and withdrawn.
- Problems with eating or sleeping.
- Bullying others.

Child Trafficking

Child trafficking is child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. They are often subject to multiple forms of exploitation.

Children are trafficked for:

- Child sexual exploitation
- Benefit fraud
- Forced marriage
- Domestic servitude such as cleaning, childcare, cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs, bag theft.

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another.

Signs that a child has been trafficked may not be obvious but you might notice unusual behaviour or events. These include a child who:

- Spends a lot of time doing household chores.
- Rarely leaves their house, has no freedom of movement and no time for playing.
- Is orphaned or living apart from their family, often in unregulated private foster care.
- Lives in substandard accommodation.
- Isn't sure which country, city or town they're in.
- Is unable or reluctant to give details of accommodation or personal details.
- Might not be registered with a school or a GP practice.
- Has no documents or has falsified documents.
- Has no access to their parents or guardians.
- Is seen in inappropriate places such as brothels or factories.
- Possesses unaccounted for money or goods.
- Is permanently deprived of a large part of their earnings, required to earn a minimum amount of money every day or pay off an exorbitant debt.
- Has injuries from workplace accidents.
- Gives a prepared story, which is very similar to stories given by other children.

Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation.

Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional.

Groomers may be male or female. They could be any age.

Many children and young people don't understand that they have been groomed, or that what has happened is abuse.

The signs of grooming aren't always obvious and groomers will often go to great lengths not to be identified.

If a child is being groomed they may:

- Be very secretive, including about what they are doing online
- Have older boyfriends or girlfriends
- Go to unusual places to meet friends
- Have new things such as clothes or mobile phones that they can't or won't explain
- Have access to drugs and alcohol.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age.

Harmful Sexual Behaviour

Harmful sexual behaviour includes:

- Using sexually explicit words and phrases
- Inappropriate touching
- Using sexual violence or threats
- Full penetrative sex with other children

Children and young people who develop harmful sexual behaviour harm themselves and others.

If you're unsure whether behaviour is healthy, Brook provides a helpful, easy to use traffic light tool. The traffic light system is used to describe healthy (green) sexual behaviours, potentially unhealthy (amber) sexual behaviours and unhealthy (red) sexual behaviours.

The tool suggests what kind of attention and response you should give to each type of behaviour. And it suggests what kind of help might be necessary to ensure the child's safety. Parents and professionals can use the tool.

Financial Abuse

Financial abuse can take many forms which includes:

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Indicators of financial abuse include:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from account.
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA

- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service.
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

Modern Slavery

The following are classed as types of modern slavery:

- Human trafficking.
- Forced labour.
- Domestic servitude.
- Sexual exploitation, such as escort work, prostitution and pornography.
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to.

The following are indicators of modern slavery:

- Signs of physical or emotional abuse.
- Appearing to be malnourished, unkempt or withdrawn.
- Isolation from the community, seeming under the control or influence of others.
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address.
- Lack of personal effects or identification documents.
- Always wearing the same clothes.
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers.
- Fear of law enforcers.

Discriminatory Abuse

Discriminatory abuse is based on any form of abuse and includes the following types:

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010).
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic.
- Denying access to communication aids, not allowing access to an

interpreter, signer or lip-reader.

- Harassment or deliberate exclusion on the grounds of a protected characteristic.
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic.
- Substandard service provision relating to a protected characteristic.

The following are possible signs of discriminatory abuse:

- The person appears withdrawn and isolated.
- Expressions of anger, frustration, fear or anxiety.
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic.

Radicalisation and Extremism

Radicalisation is a new and emerging risk to young people. Emerging government guidance, particularly the "Prevent Strategy" has been published in 2011 with regular updates (2015). Almost half of all of the people referred to the Government's de-radicalisation scheme, established in the wake of the Prevent Strategy, were under the age of 18. At all times, the welfare of the child is paramount. BCC Ltd has a moral and legal obligation to ensure that young people are protected from harm. Partners and their third party deliverers need to ensure they have policies and procedures in place to protect children and young people from exposure to highly radical or extremist views either via social media and the internet or from volunteers, officials, coaches or employees. Police forces and other statutory bodies are working more closely together than ever on this highly political and sensitive issue and are quick to act when there are concerns about a child's welfare.

For more information about the Prevent Strategy go to

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Special Notes on Peer on Peer abuse:

Children and young people may be harmful to one another in a number of ways, which would be classified as peer on peer abuse.

Introduction to abuse and harmful behaviour

Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or

'part of growing up'. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence (KCSIE, 2016). It is important to consider the forms abuse may take and the subsequent actions required.

Types of abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role-play, to sexually touching another or sexual assault/abuse.

Bullying (physical, name calling, homophobic etc.)

Bullying is unwanted, aggressive behavior among school-aged children that involves a real or perceived power imbalance. The behavior is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behavior must be aggressive and include:

- An Imbalance of Power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours,

attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

Cyber bullying

Cyber bullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass, threaten or intimidate someone for the same reasons as stated above.

It is important to state that cyberbullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.

If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations.

Sexting

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Initiation/Hazing

Hazing is a form of initiation ceremony, which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of 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 trials, which promote a bond between them. After the

hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

Expected action taken from all staff

Staff should always follow the Activate Safeguarding Flowchart and procedures contained in the “Safeguarding Methods” document.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a ‘blame’ culture and leave a child labelled.

In all cases of peer on peer abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

Appendix 2 – DBS Referral Background

The following guidance is sourced from:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#introduction>

The below extracts do not contain the full guidance, staff are required to read the guidance in the event that the following information leads them to believe that a referral may be required.

What is a referral?

A referral is information about a person. It tells us of concerns that an individual may have harmed a child or vulnerable adult, or put a child or vulnerable adult at risk of harm.

When a person has been referred, DBS considers if they need to be added to a barred list(s).

Who can make a referral?

The power to refer happens when an organisation is not acting as a regulated activity provider. This will usually be when the organisation is undertaking their safeguarding role.

The power to refer can be used when an organisation thinks a person has either:

- Harmed or poses a risk of harm to a child or vulnerable adult
- Has satisfied the harm test; or
- Has received a caution or conviction for a relevant offence and;
- the person they're referring is, has or might in future be working in regulated activity and;
- The DBS may consider it appropriate for the person to be added to a barred list

Regulated Activities and Activate

Activate has a duty to make referrals based upon its involvement in the provision of regulated activities. Information about regulated activities can be found at:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> .

Who has a legal duty to refer?

Regulated activity providers (employers or volunteer managers of people working in regulated activity in England, Wales and Northern Ireland) and personnel suppliers have a legal duty to refer to DBS where conditions are

met. This applies even when a referral has also been made to a local authority safeguarding team or professional regulator.

Legal duty to refer: the two conditions that must be met

If you are a regulated activity provider or fall within the category of personnel supplier, you must make a referral when both of the following conditions have been met:

Condition 1

- you withdraw permission for a person to engage in regulated activity with children and/or vulnerable adults. Or you move the person to another area of work that isn't regulated activity.

This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.

Condition 2

You think the person has carried out 1 of the following:

- Engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm or;
- Satisfied the harm test in relation to children and / or vulnerable adults. eg there has been no relevant conduct but a risk of harm to a child or vulnerable still exists.or
- Been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

Relevant conduct in relation to children

A child is a person under 18 years of age.

Relevant conduct is:

- Endangers a child or is likely to endanger a child
- If repeated against or in relation to a child would endanger the child or be likely to endanger the child
- Involves sexual material relating to children (including possession of such material)
- Involves sexually explicit images depicting violence against human beings (including possession of such images)
- Is of a sexual nature involving a child

A person's conduct endangers a child if they:

- Harm a child
- Cause a child to be harmed

- Put a child at risk of harm
- Attempt to harm a child
- Incite another to harm a child

Relevant conduct in relation to adults:

A vulnerable adult is a person aged 18 years or over who is being provided with, or getting a service or assistance which is classed as regulated activity for adults.

Relevant conduct is:

- Endangers a vulnerable adult or is likely to endanger a vulnerable adult.
- If repeated against or in relation to a vulnerable adult would endanger the vulnerable adult or be likely to endanger the vulnerable adult.
- Involves sexual material relating to children (including possession of such material).
- Involves sexually explicit images depicting violence against human beings (including possession of such images).
- Is of a sexual nature involving a vulnerable adult.

A person's conduct endangers a vulnerable adult if they:

- Harm a vulnerable adult.
- Cause a vulnerable adult to be harmed.
- Put a vulnerable adult at risk of harm.
- Attempt to harm a vulnerable adult.
- Incite another to harm a vulnerable adult.

A person satisfies the harm test if they may:

- Harm a vulnerable adult
- Cause a vulnerable adult to be harmed
- Put a vulnerable adult at risk of harm
- Attempt to harm a vulnerable adult
- Incite another to harm a vulnerable adult

What is harm?

This is not defined in legislation. DBS view harm as its common understanding or the definition you may find in a dictionary.

Harm is considered in its widest context and may include:

- Sexual harm
- Physical harm
- Financial harm
- Neglect
- Emotional harm

- Psychological harm
- Verbal harm

This is not a fully comprehensive list, harm can take many different forms.

What is the harm test?

A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.

Must I make a referral?

If you engage a person to work in regulated activity, you have a legal duty to refer where the relevant conditions are met.

The duty to refer applies even when a report has been made to another body such as a local authority safeguarding team.

The duty to refer applies irrespective of whether another body has made a referral to the DBS in relation to the same person.

This helps to make sure the DBS have all the relevant information to consider a case. DBS can then make a fair, consistent and thorough decision about whether to bar a person from working with vulnerable groups.

A person who is under a duty to refer and fails to refer to us without reasonable justification is committing an offence. If convicted they may be subject to a fine up to £5,000.

Can I make a referral to the DBS if the legal conditions are not met?

There could be times when you consider that you should make a referral in the interests of safeguarding children or vulnerable adults even if you have not removed the person from working in regulated activity.

This could include acting on advice of the police or a safeguarding professional, or in situations where you don't have enough evidence to dismiss or remove a person from working with vulnerable groups.

DBS are required by law to consider any and all information sent to us from any source. This includes information sent to us where the legal referral conditions are not met.

DBS will use legal powers and barring processes to determine whether the person should be barred from working in regulated activity with children and / or vulnerable adults.

If you want to make a referral to us where the referral conditions are not met, you should do so in consideration of relevant employment and data protection laws.

How to make a referral

Activate staff must not complete a referral. If a member of staff believes that a referral is required they must inform the Head of Recruitment or the Operations Director who are responsible for making all referrals.

Should I make a referral when an allegation is first made, or when I temporarily suspend someone?

When an allegation is made, you should investigate and gather enough evidence to establish if it has foundation.

This will inform your processes for any decision to dismiss or remove the person from working in regulated activity.

You should make a referral even if a significant period of time has passed between the allegation and the gathering of evidence to support a decision to make a referral.

You should complete your investigations and disciplinary processes (even if the person has left your employment).

This is particularly important as DBS rely on referral evidence and any other relevant evidence gathered.

The duty to make a referral may not be triggered by temporary suspension, it depends if you have sufficient information to meet the referral duty criteria. You may suspend a person pending an investigation where there have been allegations of harm or risk of harm.

Following investigation, if you decide to let the person return to a position working in regulated activity with children or vulnerable adults then there may not be a legal duty to make a referral.

But, if you decide to dismiss the person or remove them from working in regulated activity then you would need to make a referral.

Appendix 3 - Harmful Sexual Behaviour Help

5 to 9 Years



Green behaviours

- Feeling and touching own genitals
- Curiosity about other children's genitals
- Curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- Sense of privacy about bodies
- Telling stories or asking questions using swear and slang words for parts of the body



Amber behaviours

- Questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- Sexual bullying face to face or through texts or online messaging
- Engaging in mutual masturbation
- Persistent sexual images and ideas in talk, play and art
- Use of adult slang language to discuss sex



Red behaviours

- Frequent masturbation in front of others
- Sexual behaviour engaging significantly younger or less able children
- Forcing other children to take part in sexual activities
- Simulation of oral or penetrative sex
- Sourcing pornographic material online

9 – 13 Years



Green behaviours

- Solitary masturbation
- Use of sexual language including swear and slang words
- Having girl/boyfriends who are of the same, opposite or any gender
- Interest in popular culture, e.g. fashion, music, media, online games, chatting online
- Need for privacy
- Consensual kissing, hugging, holding hands with peer



Amber behaviours

- Uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- Verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- Exhibitionism, e.g. flashing or mooning
- Giving out contact details online
- Viewing pornographic material
- Worrying about being pregnant or having STIs



Red behaviours

- Exposing genitals or masturbating in public
- Distributing naked or sexually provocative images of self or others
- Sexually explicit talk with younger children
- Sexual harassment
- Arranging to meet with an online acquaintance in secret
- Genital injury to self or others
- Forcing other children of same age, younger or less able to take part in sexual activities
- Sexual activity e.g. oral sex or intercourse
- Presence of sexually transmitted infection (STI)
- Evidence of pregnancy

13 – 17 Years



Green behaviours

- Solitary masturbation
- Sexually explicit conversations with peers
- Obscenities and jokes within the current cultural norm
- Interest in erotica/pornography
- Use of internet/e-media to chat online
- Having sexual or non-sexual relationships
- Sexual activity including hugging, kissing, holding hands
- Consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- Choosing not to be sexually active



Amber behaviours

- Accessing exploitative or violent pornography
- Uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- Concern about body image
- Taking and sending naked or sexually provocative images of self or others
- Single occurrence of peeping, exposing, mooning or obscene gestures
- Giving out contact details online
- Joining adult- only social networking sites and giving false personal information
- Arranging a face to face meeting with an online contact alone



Red behaviours

- Exposing genitals or masturbating in public
- Preoccupation with sex, which interferes with daily function
- Sexual degradation/humiliation of self or others
- Attempting/forcing others to expose genitals
- Sexually aggressive/exploitative behaviour
- Sexually explicit talk with younger children
- Sexual harassment
- Non-consensual sexual activity
- Use of/acceptance of power and control in sexual relationships
- Genital injury to self or others
- Sexual contact with others where there is a big difference in age or ability
- Sexual activity with someone in authority and in a position of trust
- Sexual activity with family members
- Involvement in sexual exploitation and/or trafficking
- Sexual contact with animals
- Receipt of gifts or money in exchange for sex

Appendices:

- Appendix 4 - Local safeguarding contacts attached – LCSB
- Appendix 5 - External partners contacts attached – NSPCC, Pharos, The Mix