



SAFEGUARDING POLICY

Director/s	Approved Janet Starr Beverley Kirk
Designated Safeguarding Leads	Beverley Kirk Sally Robinson

Next Review date: September 2021

Safeguarding Policy

First Class Tailored Solutions Ltd is an off-site Education Provider for young people unable to attend mainstream education. Our tutors work in a variety of venues with young people.

This policy applies to all staff

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

First Class Tailored Solutions Ltd fully recognises the contribution it can make to protect children and young people and requires all staff to act in the best interest of the learners at all times.

The aim of the policy is to safeguard and promote learners' welfare, safety and health by fostering an honest, open, caring and supportive climate. The learners' welfare is of paramount importance. It is the intention of the procedures within our policy to ensure that the appropriate action is taken immediately where it is believed a learner may be at risk of significant harm or it is alleged that a learner is suspected of being abused. The prime concern at all times must be the interests and safety of the learner(s).

Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children, in line with 'Working Together' 2018 and 'Keeping Children Safe in Education' 2020

The aims of this policy are to:

- confirm that the learners' development is supported in ways that foster security, confidence and independence
- raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- confirm the structured procedures to be followed by all members of staff and those with designated responsibility for child safeguarding, health and safety and other safeguarding responsibilities
- emphasise the links with the company's guidelines for safe recruitment of staff and for managing allegations
- highlight the connection between the Safeguarding Policy and the company's policy for the safe recruitment of staff and for managing allegations
- confirm the relationship with local authority agencies centred around the safeguarding of children and young people

Safeguarding and promoting the welfare of children is defined for the purposes of this document as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

*Children includes everyone under the age of 18.

Roles and Responsibilities

The Company's Designated Safeguarding Leads are Beverley Kirk and Sally Robinson.

Where it is believed that a child may be suffering, or may be at risk of significant harm, the DSLs ensure that First Class Tailored Solutions Ltd follow the correct Safeguarding procedures. The DSLs also ensures that full records are kept of any Safeguarding issue. A single central database for all staff and their safeguarding training dates will be maintained and this list confirms that all staff have had a DBS check with the date of issue clearly identified.

All staff need to read and understand parts 1 and 5 of:

- Keeping Children Safe in Education September 2020

All staff members are aware of the need to record and report concerns about a child or children they teach. The DSLs are responsible for such records and for deciding at what point these records should be passed over to other agencies. Safeguarding records are held separately from a child's file and in secure electronic storage.

All staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.⁷

All staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children missing from education, particularly where there are concerns regarding the potential for forced marriage or female genital mutilation.

A Single Central Register will be kept by admin staff detailing all pre-employment checks, specifying when the check was made and when it will be renewed, for example, all staff will undergo an Enhanced DBS check, renewed every three years, Barred List check, Right to Work in the UK etc (Please see Recruitment and Selection Policy) Where staff subscribe to

the DBS Update service, these are checked annually. The SCR will contain details about safeguarding training dates.

The policy will be updated, at least, annually and will be available publicly via the company website.

6 Detailed

Referrals

The DSLs will: Refer cases of suspected abuse or allegations to the relevant investigating agencies; act as a source of support, advice and expertise within the educational establishment when deciding whether to make a referral by liaising with relevant agencies; liaise with the Managing Director to inform her of any issues and on-going investigations.

Training

Role of the DSLs: To recognise how to identify signs of abuse and when it is appropriate to make a referral; have a working knowledge of how the Safeguarding Board operate, the conduct of a child protection case conference, and be able to attend and contribute to these effectively when required to do so; ensure each member of staff has access to and understands the Safeguarding Policy, especially new or part-time staff who may work with different educational establishments; ensure all staff have induction training covering Safeguarding and are able to recognise and report any concerns immediately they arise; be able to keep detailed, accurate and secure written records of referrals/concerns; obtain access to resources and attend any relevant or refresher training courses at least every two years.

Raising Awareness

The DSLs will: Ensure the company's Safeguarding Policy is updated and reviewed annually. Ensure parents have access to the Safeguarding Policy via the website which alerts them to the fact that referrals may be made and the role of First Class Tailored Solutions Ltd in this process.

The Company Directors will ensure that: The policies and procedures adopted are fully implemented, and followed by all staff.

Procedures and guidelines for all staff

Early help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

Immediate response to the pupil

It is vital that our actions do not harm the learner further or prejudice further enquiries, for example:

- listen to the learner, if you are shocked by what is being said, try not to show it
- it is okay to observe bruises but not to ask a pupil to remove their clothing to observe them
- if a disclosure is made,
 - accept what the learner says
 - stay calm, the pace should be dictated by the pupil without them being pressed for detail by asking leading questions such as "what did s/he do next?" It is your role to listen - not to investigate
 - use open questions such as "is there any thing else you want to tell me?" or "yes?" or "and?"
 - be careful not to burden the pupil with guilt by asking questions like "why didn't you tell me before?"
 - acknowledge how hard it was for the learner to tell you
 - do not criticise the perpetrator, the learner might have a relationship with them
 - do not promise confidentiality, reassure the pupil that they have done the right thing, explain whom you will have to tell (the designated lead) and why; and, depending on the learner's age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as "I'll stay with you all the time" or "it will be all right now".

All policies relating to Safeguarding will be reviewed annually. These guidelines apply to all young people receiving tuition from FCTS staff.

Children may be abused or placed at risk of harm in a family, institutional or community setting. Staff at First Class have a 'duty of care' to ensure that where abusive situations become known, they are dealt with, according to the clear guidance and procedures drawn up by the Nottinghamshire Safeguarding Children Board (NSCB)/Leicestershire and Rutland Children Partnership (lrsb.org.uk). For those staff working outside of Nottinghamshire please refer to the particular local authority's safeguarding guidance.

- Staff should be alert to signs and symptoms of harm or abuse.
- Staff should know how to respond when they have concerns or when a learner discloses to them and to take appropriate actions.

- Undergo child safeguarding training which is updated regularly in line with advice from the Safeguarding Boards (City and County) (whole staff training every 3 years)

Reporting concerns to the designated leads

- Any concern should be discussed, in the first instance, with one of the designated leads, as soon as possible. **If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or police immediately. Anybody can make such a referral.**

Types of abuse

Indicators of abuse and neglect

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

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Peer on peer abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence,⁸ such as rape, assault by penetration and sexual assault;
- sexual harassment,⁹ such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting,¹⁰ which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

Mental Health

All staff should also 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Information sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for all stakeholders to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within FCTS and with the three safeguarding partners, other organisations, agencies and practitioners as required. Case Managers/staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

FCTS is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on the company and our staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Actions where there are concerns about a child – key elements

- **Recognition**
- **Response**
- **Inform Case Manager and DSL in line with company policy**

Female Genital Mutilation (FGM)

***Any suspected cases of FGM must be reported to social care.**

Female Genital Mutilation occurs mainly in Africa and to a lesser extent, in the Middle East and Asia. Although it is believed by many to be a religious issue, it is a cultural practice. There are no health benefits.

Communities particularly affected by FGM in the UK include girls from:

Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

In the UK, FGM tends to occur in areas with larger populations of communities who practise FGM, such as first-generation immigrants, refugees and asylum seekers. These areas include:

London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes.

In England and Wales, 23,000 girls under 15 could be at risk of FGM.

Key Points:

- Not a religious practice
- Occurs mostly to girls aged from 5 – 8 years old; but up to around 15
- Criminal offence in UK since 1985
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison

Reasons for this cultural practice include:

- Cultural identity – An initiation into womanhood
- Gender Identity – Moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – unmutilated women are regarded as unclean.

Risk Factors include:

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the family's country of origin
- talk about a 'special' event or procedure to 'become a woman'

High Risk Time

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Staff should be alert to the possibility of FGM as a reason why a girl in a high risk group is absent from provision or where the family request an 'authorised absence' for just before or just after the summer school holidays.

Although, it is difficult to identify girls before FGM takes place, where girls from these high risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services. As of January 2016 staff should inform police directly if you comes across a case of FGM.

Post-FGM Symptoms include:

- difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

Longer Term problems include:

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure

- cysts and abscesses
- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

Responding to a disclosure

A ‘disclosure’ is when a learner confides information which is of a sensitive nature and which gives you cause to be particularly concerned e.g. being hit at home, a sexual assault, unfed, medical needs not attended to, inappropriate punishments by parents, continual verbal abuse, and pregnancy.

Always believe the learner and accept what he/she says and take the matter seriously, even if what you hear sounds unlikely.

Listen carefully and make notes. Only prompt the student by asking open questions eg. ‘Is there anything else you want to tell me?’ Write notes using the child’s/YP’s own words/descriptions. The pace should be dictated by the child/young person without them being pressed for detail. The role of staff is to listen, not investigate.

If bruising or injury is observed try to record the detail of it, eg. ‘right arm above elbow.’ Do not take photographs.

Take as much time as the learner needs. Reassure them that they have done the right thing by telling you. It is important that you avoid making promises you cannot keep, ‘It’ll be all right now.’ ‘I’ll stay with you all the time.’

Make sure the learner understands that you will have to tell someone else in order to help them. This will only be on a ‘need to know’ basis; it will be confidential to as few people as possible.

‘Children want to be respected, their views to be heard, to have stable relationships with professionals built upon trust and for consistent support provided for their individual needs. This should guide the behaviour of professionals. Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; work with them collaboratively when deciding how to support tier needs.’ Working Together 2018

Supporting Learners

- The staff recognise that a child or young person who is abused or witnesses violence may find it difficult to develop and maintain a sense of self worth. We recognise that in these circumstances pupils might feel helpless and humiliated, and that they might feel self blame.
- We recognise that a child’s tutor might provide the only stability in the lives of pupils who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a pupil in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn.
- Supporting children in care is a key priority for all staff. We recognise that the needs of this group of children can only be effectively met when all agencies work together.

Vulnerable Groups

Some children and young people may be particularly vulnerable to abuse and harm. This includes for example privately fostered children, children with a disability, children with communication needs or other diagnosed SEND. Certain forms of behaviour can also increase the vulnerability of a young person such as drug or alcohol misuse.

Children in Care (LAC) and Children Previously in Care (PLAC)

Supporting children in care and children who have been in care is a key priority for our school. We recognise that the needs of this group of children can only be effectively met when all agencies work together. To ensure we have a coordinated approach to meeting the needs of children in care who attend our provision we have a designated lead, who is Beverley Kirk.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

FCTS has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although FCTS has a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform FCTS, however, it should be clear to FCTS who has parental responsibility.

FCTS staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead/Case Manager will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

FCTS will take steps to verify the relationship of the adults to the child who is receiving tuition.

Child Sexual Exploitation

The sexual exploitation of children and young people (CSE) under-18 is defined as that which: 'involves exploitative situations, contexts and relationships where young people (or a

third person or persons) receive ‘something’ (eg. Food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

CSE can occur through use of technology without the child’s immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child or young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.

CSE is a form of abuse which involves children male and female, of different ethnic origins and of different ages, receiving something in exchange for sexual activity. FCTS staff are well placed to prevent, identify and respond to children at risk of sexual exploitation.

Young people with special educational needs and/or disabilities can be particularly vulnerable to various forms of abuse.

Who is at risk?

CSE can happen to any young person from any background although the research suggests that females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser/s. As a result, victims do not make informed choices to enter into, or remain involved in, sexual exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen on line. It can also occur between young people. In all forms, CSE is child abuse and should be treated as a child safeguarding issue.

Legal responsibility

In the exceptional case of a Safeguarding issue going to Court, the need for all staff involved to make and keep accurate notes is particularly pertinent. Any member of staff may be required to testify under oath.

Concerns raised by parents - These should be directed to the DSLs and the Managing Director.

Allegations against members of staff

Should a member of staff find themselves in a situation whereby an allegation of abuse or other has been made against them, they should contact the Managing Director and DSLs. Do not discuss the allegation with other staff or approach the child. The Managing Director and DSLs will consult the document: ‘Staff facing an allegation of abuse. Guidelines on practice and procedure’ and will contact the Local Authority Safeguarding Officer or other appropriate agency officer. Should an allegation be made against management the LADO will be contacted by the DSL and appropriate advice sought. Similarly, any allegations between students will be referred to the DSL.

Staff should not feel that awareness of these potentially serious issues detracts from developing positive relationships with young people or spoils the enjoyment that is derived from the challenge and pleasure of working with them. Both incidents of abuse and allegations against staff are rare. Staff should feel confident in the knowledge that they know the correct procedure and how the First Class Tailored Solutions Ltd will support them if they are involved in a Safeguarding issue.

Attendance

Reporting of Attendance

Attendance is recorded electronically both AM and PM for all learners. Any non attendance, on a session by session basis, will be reported to by the Tutor the Case Manager who will then make a call to the home to report the young person's non attendance. This will also be communicated to our referrers in line with contractual agreements. FCTS do not operate a 'send home' policy for lateness. The tutor will wait 30 minutes before contacting all relevant parties and if appropriate will carry out a home visit. In the event of a young person walking off without permission tutors should make a reasonable attempt to locate the learner, tutors should contact the parent/carer and Case Manager, this will be passed on to all relevant parties.

During break times it is important that staff keep learners within sight at all times. Staff should be aware that truancy can put young people in danger.

*CMs should ensure that THREE contact phone numbers are obtained on the first home visit following a referral, an absolute minimum of TWO phone contacts.

The reporting of attendance by FCTS staff will flag up to referrers immediately if there are any concerns relating to CME.

Health and Safety

A learner risk assessment will be completed/obtained as a result of referrer information and following the Induction Meeting conducted by the Case Manager.

Venues identified for tuition will have been risk assessed prior to use. Health and Safety Regulations such as 'Procedures in the event of a fire' will be explained to the learner on the first visit.

Drugs and Substance misuse

Any young person thought to be in possession of or under the influence of drugs will be reported by the tutor to the Case manager who will contact the parent/carer. The appropriate agencies will also be informed.

Leaners found in possession of illegal substances will have them confiscated and it is likely than the illegal substances will be destroyed, staff ensuring that either photographic evidence of the disposal is captured or witnesses present. It is probable that the police will be informed.

It is particularly important to be aware of '**County Lines**' and accordingly be vigilant whilst working with learners. The UK Government defines county lines as: County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. Those involved in county lines are likely to exploit children and vulnerable adults

to move and store the drugs and money and they often use coercion, intimidation, violence (including sexual violence) and weapons.

What is Child Criminal Exploitation?

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

Child Criminal Exploitation (County Lines)

All staff should be aware that children can become involved in any aspect of criminal exploitation and should be able to recognise the indicators of this abuse. This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity a) in exchange for something the victim needs or wants and/or b) the financial or other advantage of the perpetrator and facilitator and/or c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. Any concerns of this nature must be reported to the DSL and external agencies as appropriate.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from provision, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance¹¹

Who is vulnerable to county lines exploitation?

The national picture on county lines continues to develop but there are recorded cases of:

- children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area; 15-16 years is the most common age range
- both males and females being exploited
- White British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationality may be exploited
- the use of social media to make initial contact with children and young people

- class A drug users being targeted so that gangs can take over their homes (known as ‘cuckooing’).

We do know that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person’s vulnerability include:

- having prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a physical or learning disability
- having mental health or substance misuse issues;
- being in care (particularly those in residential care and those with interrupted care histories)
- being excluded from mainstream education, in particular attending a Pupil Referral Unit.

If you suspect a learner may be involved in ‘county lines’ inform your CM and DSO immediately.

SafeCall in Schools and Colleges: A lifeline for children and families forced into criminal exploitation (Missing People)

County Lines – Threat, harm and risk to pupils and learners

The threat associated with County Lines drug distribution networks has rapidly grown with over 2000 identified drug lines operating across the UK, primarily through dedicated mobile phone lines. Children and young people are approached physically or online before being targeted, groomed and exploited by drug gangs. They are forced to transport and store drugs, weapons and cash between import and export areas as well as to work on the line, delivering and dealing drugs, usually crack cocaine and heroin, to vulnerable drug users.

The nature of County Lines and Child Criminal Exploitation is a rapidly changing picture of threat, harm and risk. Gangs and those wishing to exploit children and vulnerable adults are continuously adapting their business tactics to increase their chances of going undetected by law enforcement and other agencies.

While continued lateness and poor attendance over a number of days were previously strong indicators of possible involvement in County Lines (alongside wearing two layers of

clothing), there is now a move towards being missing for shorter periods during a school day. This new trend avoids triggers being hit within school or college, and staff not being alerted as promptly to the missed lessons and absence.

SafeCall provides a national telephone based support service to those in crisis caused by County Lines including young people, families/carers and professionals. The helpline operates 24 hours a day, seven days a week on

For young people we provide crisis support, whether that is at 3PM on a Monday afternoon or 3AM on a Saturday morning. We are there to help them with safety planning and mapping, mobilising help from other agencies and supplying them with a free safety device (Ownfone) where appropriate.

Referring to SafeCall

To refer a young person or family member (with their consent) there are a number of ways you can contact the team:

Complete the online referral form here:

<https://www.missingpeople.org.uk/how-we-can-help/safecall/974-are-you-a-professional.html>

Email - safecall@missingpeople.org.uk

Telephone Safecall - 0208 392 5710 between 10.00 – 18.00 hours Monday to Friday

Telephone Missing People Helpline 24 hours, 7 days a week - 116 000 (who will respond outside of Safecall office hours)

Download more information about SafeCall: SafeCall in Schools and Colleges <https://www.safeguardinginschools.co.uk/safecall>

Knife Crime

Knife crime is a major concern nationally and in particular for the risk it poses to young people. Carrying a knife puts a young person at risk of being harmed by a knife. Possession of a knife can impact on a YPs future and the use of a knife has consequences for both the victim and the offender.

The possession of a knife can be an early indicator of further offending if the underlying behaviour is not challenged. It is important that all knife related incidents are dealt with appropriately.

Step 1: Manage any immediate risk of harm, call the police if there is an immediate risk of harm to others.

Step 2: record the details of the incident.

Step 3: Assess and record if there is any on-going risk of harm from the incident. Of particular importance is the issue of reprisals from any conflict but you should also consider the risks to any potential witnesses, especially other YPs.

Step 4: Inform the DSL

Step 5: DSL/CM to inform the YOT Police, sharing the details and the RA.

Medical Needs

Where a learner requires the administration of medication during a tutoring session, written parental consent will be sought within the induction meeting with case managers.

Where a learner remains on the roll of a school, written permission to administer medication, will also be sought from the Head teacher.

In the event of a medical emergency an ambulance will be called by the member of staff and parents/carers/case manager informed immediately. In the key venues used by FCTS staff, Ransom Wood and Grove House Stables there are trained FCTS First Aiders on site, additionally libraries have an on-site First Aider.

Lone Working

Staff should never work alone with a child/young person, a parent/carer must always be present. See Lone Working Policy.

All staff are encouraged to use the 'Stay Safe' mobile phone app which allows staff to check in at the start of a session and check out at the end.

Social Networking/ICT Acceptable Use

Staff must not liaise/communicate with any young person being tutored by FCTS via any form of social networking site.

This message is conveyed through regular e mails and during the 'Safeguarding' update at the start of every staff meeting. (Held half-termly)

Additionally, the safe use of 'multi media' in its widest sense, particularly internet use, must be promoted by staff and vigilantly monitored.

An E Safety Acceptable Use Statement will be signed by learners during the initial meeting with Case Managers, parents will also be made aware of acceptable use guidelines.

Mobile Phones

Staff need to be alert to any inappropriate material viewed by a young person on any mobile device. In addition, practices such as 'sexting' can put young people in danger.

Sexting

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'

Preventing Violent Extremism

'Prevent' is one strand of the Government's counter-terrorism strategy, CONTEST. Its main aim is to prevent people becoming terrorists or supporting terrorism. The Counter-terrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of becoming radicalised.

The 'Prevent' Strategy has 3 clear objectives:

- Terrorist ideas should be identified and challenged
- Vulnerable people should be supported and protected from becoming terrorists or supporting terrorism
- Communities, institutions and the Government should all work together to tackle the problem of extremism.

It is the duty of all First Class staff to ‘safeguard’ our learners from radicalisation and extremism in any form, eg. right wing extremism or extremism relating to animal rights, and duly inform the DSLs if there are any concerns relating to this issue.

Statutory guidance has been published and is available here:
<https://www.gov.uk/government/publications/prevent-duty-guidance>

If you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the Prevent Team prevent@nottinghamshire.pnn.police.uk who will then contact you to discuss whether a referral should be made. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

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‘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. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Staff should be alert to a violent crime or incident which may be committed to protect or defend the honour of the family or community.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Children who Self-harm

Staff should always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse. All such cases should be discussed with children's social care.

Even in those unusual cases where a primary age child is thought to have self-harmed it is important to recognise that this behaviour is an indicator of emotional distress and the child will need support to address this.

Children with continence issues

Having control over continence is a developmental skill, and like other skills, children will attain it at different ages. Bedwetting (also known as nocturnal enuresis) is common and very few children will wet the bed on purpose. Bedwetting and daytime continence issues can have a significant impact on a child's behaviour and wellbeing. It can also be stressful for the parents or carers.

When supporting the child and their family, the emphasis must be on normalisation, no blame, no shame and strictly no punishments. Children should not be held responsible for their continence issues - rewards for dry nights are therefore unhelpful. NICE guidelines make it clear that maltreatment should be considered if a child is consistently reported to be deliberately wetting themselves, or the parents or carers are repeatedly punishing the child for their continence issues despite professional advice that it is involuntary.

COVID

All staff are expected to remain up to date with government guidelines about managing the on-going effects of the pandemic, this includes:

- An awareness of hygiene requirements – eg. frequent hand washing, sanitising
- An awareness of PPE requirements – eg. The use of masks/visors
- The requirement for thorough risk assessments for tutoring
- An awareness of symptoms and the necessary steps required in dealing with symptoms: high temp, new, continuous cough, loss or change to your sense of smell or taste.
- Self-isolation for 14 days where there are symptoms, adherence to any quarantine requirements following travel abroad.
- Remote Learning – See Remote teaching and Learning Policy

Further guidance

To support the work around child protection and safeguarding, links to statutory, national and local guidance are below:

- Child Sexual Exploitation 'What to do if you suspect a child is being sexually exploited'
<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>
- Female Genital Mutilation (FGM)
<http://media.education.gov.uk/assets/files/pdf/f/fgm%20guidance.pdf>

- Children who may have been trafficked
<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>
- Gang and Knife Crime DCSF – 00064-2010
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288804/Safeguarding_children_Gang_activity.pdf
- Homophobic, Transphobic Bullying
<https://www.gov.uk/government/news/homophobic-bullying-in-schools-project-gets-underway>
- Guidance is also available on the NCSCB Website for Children with Looked After Status and Children Missing from Home and Care
- Private fostering arrangements - www.privatefostering.org.uk
- Sexting in Schools and Colleges
www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB_1_.PDF
- Further information and guidance around Disqualification by Association produced by Nottingham City Council's HR Advisory Service can be found here in the Downloads section: <http://www.nottinghamcity.gov.uk/esn/index.aspx?articleid=19323>
- Guidelines on supporting children with continence issues -
<https://www.nice.org.uk/guidance/CG111/chapter/introduction>
- 'Keeping Children Safe in Education' Sept 2020

***All staff have read 'Keeping Children Safe in Education 2020', this forms part of the annual safeguarding refresher training

Updated Feb 2014 - Cathy Brown

Updated Feb 2015 – Beverley Kirk/Cathy Brown

Updated May 2015 (Preventing Extremism) B Kirk

Updated June 2015 (Health and Safety) B Kirk

Updated September 2015 (Child Safeguarding Policy Framework for Nottingham Schools) B Kirk

Updated January 2016 (CSE and FGM)

Updated September 2016 (truancy/sexting/honour based violence/use of 'multi-media')

Updated November 2016 (B Kirk) (Immediate response to the pupil, Supporting Pupils, additions to Preventing Radicalism, E –Safety Use, Private Fostering, Children who Self-Harm, Children with continence issues, Further Guidance)

Annual Update Feb 2017 – B Kirk

Annual Update Feb 2018 – B KIRK

Annual update Feb 2019

Updated Sept 2019

Updated Sept 2020

Updated Nov 2020 – B Kirk