



# Safeguarding and Prevent Policy

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## Introduction

Guard Business Solutions (GBS) fully recognises its statutory and moral duty to promote the safety and welfare of those students who are under the age of 18 years and those adult students who are deemed to be vulnerable; however, GBS has a moral duty and is committed to the safeguarding of all students regardless of their age and vulnerability.

This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004; the education Act 2002, and in line with the government publication: 'Working Together to Safeguard Children (2016)', the statutory guidance.

'Keeping Children Safe in Education (2019)'.

## Scope

This policy and its procedures will apply to:

- The board
- Employees of GBS
- Students
- Contractors
- Employers providing an apprenticeship
- All other users of Guard Business Solutions
- All GBS Training activities

The policy and procedures will always apply when Guard Business Solutions is providing services or activities that come under the responsibility of the organisation.

GBS recognises that safeguarding and promoting the welfare of its students is everyone's responsibility. Everyone who encounters a student, their families and carers has a role to play in safeguarding.

## Definitions

Although legislation is specifically related to children and vulnerable adults as defined below, GBS is committed to the safeguarding of all students and the term student is used throughout this policy.

Child is defined as anyone who has not reached their 18th birthday,

Vulnerable Adult is defined as a person age 18 years or over and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take of him or herself, or unable to protect him or herself against significant harm or exploitation. This may include a person who has a learning difficulty, a physical or sensory disability or a mental illness.

Safeguarding and promoting the welfare of students is defined in 'Working Together to Safeguarding Children (2015)' as:

- Protecting children for maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provide of safe and effective care
- Taking action to enable all children to have the best outcomes
- Safeguarding actions many be needed to protect students from the following:
- Physical abuse
- Emotional abuse

- Sexual abuse
- Peer on peer including upskirting
- Serious Violence
- Child criminal exploitation – County Lines
- Neglect
- Bullying including cyberbullying
- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced Marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental Health
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking

Staff needs to have an awareness of the different types of safeguarding issues and explanations and definitions. Staff should also be aware that behaviors linked to, for examples, drug taking, alcohol; abuse, truanting and sexting also put students in danger.

## Looked After Children

All staff need to be aware of issues around safeguarding looked after children. The most common reason for young people becoming looked after is a result of abuse and/or neglect.

## Students with Special Educational Needs and Disabilities

All staff need to be aware that additional barriers can exist when recognizing abuse and neglect in students with special educational needs (SEN) and disabilities. This can include:

- Assumptions that indicators of possible abuse such as behavior, mood and injury relate to the student's disability without further exploration.
- Students with SEN and disabilities can be disproportionately impacted by issues such as bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

## Procedure for Staff

### If Guard Business Solutions staff have concerns about a student:

- If Staff members have any concerns about a student, this must be referred to a member of the Safeguarding Team to agree a course of action. Options can include referral to specialist services or early help services. Guard Business Solutions recognizes its role in identifying students who may benefit from early help and providing support as soon as a problem emerges in a student's life. Providing early help is more effective in promoting the welfare of young people than reacting later. Staff may be required to support other agencies and professionals in an early help assessment and share information support early identification and assessment.
- If early help is appropriate, the Safeguarding Team will support the staff member to liaise with external agencies. The student should then be monitored and if the situation does not appear to be improving, a referral will be made by a member of the Safeguarding Team to Children's Social Care ensure the student's situation improves.
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### If GBS staff believe a student is in immediate danger or at risk of harm:

- This immediate concern must be reported to a member of the Safeguarding Team and if a student is in immediate danger or risk of harm, a referral will be made to children's social care and/or to the police immediately.

Staff responsibilities or 5R's are summarized as:

1. Recognise
2. Respond
3. Record
4. Report
5. Refer

### If a student makes a disclosure to a member of staff:

- If a student makes a disclosure to a member of staff, the student should be acknowledged, taken seriously and listened to.
- As soon as it becomes clear that the learner is talking about a safeguarding issue, you need to gently stop them and inform them that if they continue you, that we have a legal obligation to pass this information on to a Designated Safeguarding Person. You cannot promise confidentiality to the student. Reassure the student but tell them that a record of information given will be made.
- It is important not to ask too many questions as it is clear that you must not under any circumstances investigate any accusations
- Allow the student to freely recall significant events, keeping questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said. Record the factual details of what has been told to you using the Safeguarding disclosure form.

## Concern/Disclosure Form

Contact a Designated Safeguarding Person (Safeguarding Team contacts are detailed in Appendix B) immediately to explain the situation and pass on the written notes. The Designated Safeguarding Person will outline the action that he/she has to take so that you can explain this to the student. It may be appropriate for the Designated Safeguarding Person to meet the student. You must not take any further action yourself. This includes contacting parents/carers or outside agencies.

## If a member of staff receives information about a student from another person

If a member of staff receives information about a student, which suggests that there is a safeguarding issue or that this is likely, this must be recorded on a Safeguarding Concern/Disclosure Form and reported immediately to a Designated Safeguarding Person. GBS has a duty to refer these concerns to the Local Authority Children's Social Care Officer for the area in which the student lives or to the police if the student is in immediate danger.

## If a member of staff suspects a student has a safeguarding concern

If a member of staff suspects that a student is at risk from a safeguarding issue, they must discuss these concerns with a Designated Safeguarding Person and not take any independent action.

The concerns must be recorded on the Safeguarding Concern/Disclosure form.

All contact with outside agencies over issues of safeguarding must be approved by the Designated Safeguarding Lead/Deputy Designated Safeguarding leads. The designated Safeguarding Lead/Duty Designated Safeguarding Leads will decide whether to make a referral to children's social care.

Parents/carers have the right to be informed in respect of any concerns or any actions taken to safeguard and promote their welfare, providing this does not compromise the student's safety.

## Allegations of abuse made against other young people

Staff must recognise that children can abuse their peers and be aware that safeguarding issues can manifest themselves via peer on peer abuse. Peer on peer abuse is abuse young people may experience from their peers (people of their own or similar age) perpetrated by a young person/s (under the age of 18 years)/vulnerable adult(s) young person(s) vulnerable adult(s).

Staff need to be aware that abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. GBS will take any concerns of this nature very seriously and concerns should be raised in the same way as any other concerns, directly to a Personal Tutor or to the Safeguarding Team.

Peer on peer abuse can take the form of bullying (including cyber-bullying) sexting and any other form of sexual or physical abuse including up skirting and initiation/hazing. Gender based issue can also occur for example girls being sexually touched/assaulted or boy being subject to initiation/hazing type violence.

## Visitors

All official visitors to Guard Business Solutions are required to sign in when entering the office and sign out on their departure. Visitors are not permitted to enter controlled areas unless accompanied by a member of staff.

## Apprentices work setting

Guard Business Solutions has a responsibility to ensure the health, safety and welfare of all students undertaking apprenticeships with employers. GBS will ensure that employers are aware of this policy and their responsibilities of compliance in relation to Safeguarding and the Prevent duty for any student who is placed with them and that arrangements are in place to ensure that a student's wellbeing is safeguarded.

## Student with Criminal Convictions

Guard Business Solutions is committed to the fair treatment of all students and welcomes applications from a wide range of individuals, including those with criminal convictions. GBS is mindful, however, of the duty of care it owes to its student, staff and the wider community to act reasonably to protect their health, safety and

welfare. Consequently, GBS requires all applicants to disclose any criminal convictions on application and re-enrolment.

If a criminal conviction is disclosed or otherwise brought to our attention, GBS will work with that person to determine the level of risk posed by the conviction to both the individual and/or to others. The individual will be required to complete a Criminal Convictions Disclosure Form providing GBS with further information about the offence and contact details for any relevant third-party e.g. a Probation Officer.

The information given on the Disclosure Form will then be used to assess whether there is any risk posed should the individual enroll on a course with GBS. An interview must take place with one of the nominated Safeguarding Team prior to enrolment to approve the application and sign the enrolment form. Where medium/high risk has been identified, this will be referred to the Safeguarding Team and enrolment deferred until a decision is reached.

### Concerns about another Staff Member

It is recognised that sometime allegations may involve a member of Guard Business Solutions Staff. In these circumstances the allegation must be reported directly to the Managing Director.

In the absence of the Managing Director, the Head of Performance must be informed. On receipt of such as allegation, GBS's disciplinary procedures relating to allegations of abuse will be followed. Additionally, the Chair of the Board will be notified if the allegations relate to the Managing Director.

### Concerns about Safeguarding Practices

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the Guard Business Solution's safeguarding practices and that such concerns would be taken seriously by the Management and Leadership Team. If staff members have any concerns about the safeguarding regime, they should raise this initially with their Line Manager. If no immediate action is taken, then appropriate Whistleblowing Procedures are in place for such concerns to be raised with the Management and Leadership Team.

Where a staff member feels unable to raise an issue with Guard Business Solutions or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: General guidance can be found at – Advice on whistleblowing.

The NSPCC whistleblowing helpline is available or staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call :08000280285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

# Responsibilities

## The Board

### The board will:

1. Ensure that Guard Business Solutions has an effective Safeguarding and Prevent Policy in place which is updated annually, and that Guard Business Solutions contributes to inter-agency working in line with statutory guidance 'Working Together To Safeguard Children 2015' and 'Keeping Children Safe in Education 2019'.
2. Ensure that the Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB).
3. Ensure that Guard Business Solutions complies with the Prevent Duty as set out in the Counter Terrorism and Security Act 2015.
4. Ensure that the policies and procedures in place enable appropriate action to be taken in a timely manner to safeguard and promote students' welfare.
5. Appoint a Board Member with responsibility for Safeguarding and Prevent who will liaise with the Managing Director and the Designated Safeguarding Lead.
6. Ensure that a Designated Safeguarding Lead is appointed to lead on safeguarding, advise/support staff and liaise with the Local Authority and other agencies. He/she will have status/authority to carry out the role e.g. commit resources to safeguarding and direct staff as appropriate.
7. Give scrutiny to regular reports which will provide detail on the numbers and types of safeguarding incidents and concerns which have arisen, along with updates from Human Resources and Workforce Development.
8. Ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
9. Ensure that a member of the Board Body is nominated to liaise with the designated officer for the relevant local authority and partner agencies in the event of a safeguarding allegation being made against the Managing Director.

## The Managing Director

The Managing Director overall responsibility for and oversight of Safeguarding within Guard Business Solutions and will ensure through GBS Management and Leadership Team and the Personal Development Welfare and Behavior Action Group that:

1. Safeguarding policies and procedures and any linked Safeguarding policies are fully implemented and followed by all staff.
2. All staff feel able to raise concerns about poor or unsafe practice regarding students and that concerns will be addressed sensitively and in a timely and appropriate manner.
3. Policy/procedures are available to parents/carers and employers on request

## The Designated/Deputy Safeguarding Leads (DSL)

The Designated/Deputy Safeguarding Lead/s will:

1. Ensure that the Safeguarding Policy, including Prevent, is reviewed annually and the procedures and implementation are reviewed regularly by the Personal Development, Welfare and Behavior Action Group and the Board.
2. Ensure that the Safeguarding Policy is available publicly and that parents/carers and employers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Guard Business Solutions in this.
3. Provide an Annual Safeguarding report for the Board, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and Board members and number and types of incidents/cases.

4. Ensure the quality assurance of the provision of safeguarding information, advice and guidance and procedures.
5. Ensure there is liaison with employers providing Apprenticeships to ensure proper safeguarding arrangements are in place.
6. Act as a source of support, advice and expertise to staff on matters of safety and safeguarding, when deciding to make a referral, by liaising with relevant agencies.
7. Keep detailed, accurate, confidential and secure written records of concerns, disclosures and referrals. Ensure all such records are kept confidentially and securely.
8. Liaise with the Safeguarding Team/ any other relevant staff to inform of any issues/ongoing investigations via the Safeguarding Operations Group.
9. Ensure the Safeguarding Team act as a key point of referral for students/staff/ parents/carers, offer advice, assess information promptly, take action or refer on to the Designated/Deputy Safeguarding Lead so that GBS can respond swiftly and appropriately to all concerns referrals and disclosures.
10. Have access to resources and attend any relevant or refresher training courses at least every two years.

## The Personal Development Welfare and Behavior Action Group

The Personal Development Welfare and Behavior Action Group will:

1. Oversee and review the Safeguarding Policy and Procedures, including linked policies.
2. Raise awareness of developments in safeguarding legislation and good practice.
3. Ensure the quality assurance of provision of safeguarding information, advice and guidance.
4. Ensure compliance with national standards and LSCB guidance through annual audits.
5. Receive and commission reports from the Safeguarding Operational Group
6. Receive and monitor reports relating to safeguarding in the curriculum.
7. Receive and commission reports from the Health and Safety on the progress of safeguarding through the effective use of risk management.
8. Monitor the staff and boards' workforce development record in relation to Safeguarding and Prevent.

# Appendix A

## Definitions

(Definitions taken from Keeping Children Safe in Education (KCSI)2019 and the supplementary guidance within KCSI.)

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by definition or label. In most cases multiple issues will overlap with one another.

**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 (e.g. via the internet). They may be abused by an adult or adults or 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children to frequently feel frightened or in danger, 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 not 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 is not solely perpetrated by adult males. 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.

**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 cyber bullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Upskirting, 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 rituals

All staff should be clear as to GBS's policy and procedures with regards to peer on peer abuse

**Serious violence:** 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 school, a change in friendship 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 guidance.

**Child criminal exploitation: county lines** Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>15</sup> should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favor of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**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 as a result, 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.

**Bullying, including cyberbullying:** Under the Children Act 1989, a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, GBS Training staff should report concerns to a member of the Safeguarding Team. Even where safeguarding is not considered to be an issue, GBS Training may need to draw on a range of external services to support the student who is experiencing bullying or tackle any underlying issue which has contributed to a student engaging in bullying.

Bullying is behavior by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds

of race, gender, religion, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences. Stopping violence and ensuring immediate physical safety is the first priority for GBS, but staff need to be aware that emotional can be more damaging than physical.

Many experts say that bullying involved an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

**Child Missing from Education:** All staff should be aware that children going missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. GBS Training staff should follow the GBS Training's procedures for tracking attendance and absence.

**Children with family members in prison** Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children

**Child Sexual Exploitation (CSE):** is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology. Like all forms of child abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17-year old's who can legally consent to having sex;
- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non- penetrative acts) and non-contact sexual activity;
- Can take place in person or via technology, or a combination of both;
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- May occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;

- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

**Domestic Violence;** The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behavior, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse

**Drugs** – This includes alcohol, tobacco, illegal drugs, medicines, new psychoactive substances ('legal highs') and volatile substances.

**Fabricated or induced illness** – There are three main ways of the parent / carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms which may include fabrication of past medical history
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may include falsification of letters and documents
- Induction of illness by a variety of means

**Faith Abuse** is child abuse linked to faith or belief. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in Hindu context): ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies: and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

**So-called 'honour-based' violence:** (including Female Genital Mutilation and Forced Marriage) HBV encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or

community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. 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.

**Actions:** If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers<sup>16</sup> that requires a different approach

**FGM:** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon tutors along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Tutors must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmua@fco.gov.uk](mailto:fmua@fco.gov.uk).

An arranged marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing marriage partner, but both parties are free to choose whether to enter into the marriage or not.

**Gangs and Youth Violence:** Groups of children and young people often gather together in public places to socialise, and peer association is an essential feature of most children's transition to adulthood. Groups of children and young people can be disorderly and/or anti-social without engaging in criminal activity. Young people on the periphery of becoming involved with street gangs and those young people already involved in some way can be described as 'A relatively durable, predominantly street-based group of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity'.

**Youth Violence:** Youth violence, serious or otherwise, may be a function of gang activity. However, it could equally represent the behavior of a child acting individually in response to his or her particular history and circumstances. 'Serious youth violence' is defined as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19', i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

Most children and young people do not become violent overnight. Their behavior represents many years of (increasingly) anti-social and aggressive acts.

**Mental Health:** mental health problems can include depression, anxiety, eating disorders, self-harm, suicidal tendencies and the potential risk of harming others.

**Preventing Radicalisation:** Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation<sup>19</sup> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behavior, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel program.

Where deemed appropriate, GBS will seek external support for learners through referrals to the Channel Program. This program aims to work with the individuals to address their specific vulnerabilities and prevent them becoming further radicalised.

**The Prevent Duty:** All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

Additional support. The department has published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges. Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

### **What is Terrorism/Extremism?**

Terrorism covers all forms of extremism both violent and non-violent and is defined in the national Prevent Strategy as any vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Prevent covers internal and domestic terrorist threats, and includes the activities of far right groups, and animal rights groups.

### **What is Radicalisation?**

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Safeguarding from extremism is no different to how staff would share a concern about drugs, physical and sexual abuse or any other safeguarding concern.

### **What is Channel?**

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk from radicalisation using collaboration between local authorities, statutory partners, the police and local community to:

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for the individual concerned

The following indicators identify factors that may suggest a young person, or their family may be vulnerable to being drawn into extremism:

- Identify crisis – distance from culture religious heritage and uncomfortable with their place in the society around them.
- Personal crisis – family tensions, sense of isolation, adolescence low self-esteem, disassociation from existing friendship groups and becoming involved with a new and different group of friends searching for answers to questions about identity, faith and belonging.
- Personal circumstances- migration, local community tensions, events affecting Country and region, alienation from UK values having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy, unmet aspirations, perceptions of injustice feeling of failure, rejection of civic life, criminality, experiences of imprisonment, poor resettlement, reintegration, previous involvement with criminal groups.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Potential indicators of radicalisation are listed below;

- Use of inappropriate language
- Possession or accessing violent extremist literature
- Behavioral changes
- The expression of extremist views

- Advocating violent actions and means
- Association with known extremists
- Articulating support for violent extremist causes or leaders
- Using extremist views to explain personal disadvantage
- Joining or seeking to join extremist organisations
- Seeking to recruit others to an extremist ideology

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate will be dealt with in line with the Student Disciplinary Policy and the Code of conduct for staff.

Staff should use their professional judgement and discuss with a Designated Safeguarding Person if they have any concerns. Once assessed, and if appropriate, this will be referred into the Channel Panel Process.

Guard Business Solutions has an identified single point of contact (SPOC) in relation to Prevent which is the Director of Strategic Development (Designated Safeguarding Lead) and any concerns discussed with any members of the Safeguarding Team will be passed on and referred if appropriate.

- Undertake Training in the Prevent duty as identified by Guard Business Solutions to ensure they have an understanding of the factors that make people vulnerable to being drawn into terrorism and that they are to recognise this vulnerability and are aware of what actions to take.
- Exemplify British/Community Values into their work and practice and that opportunities in the curriculum are used to promote these values to students.

### **Youth Produced Sexual Imagery (Sexting)**

Making, possessing and distributing and imagery of someone under 18 which is indecent is illegal. This includes imagery created by under 18s themselves. The relevant legislation is contained in the Protection of Children ACT 1978 (England and Wales) as amended in the Sexual Offences Act 2003(England and Wales)

Specifically, it is an offence to possess and distributing, show and make images of children. The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18. The latest guidance from the UK Council for Child Internet Safety (UKCCIS) introduces the phrase 'youth produced sexual imagery' instead of 'sexting'. (August 2016). This guidance refers to sexual imagery and not indecent imagery as indecent is subjective and has no specific definition in law.

The types of incidents covered by this guidance are:

- A person under the age of 18 creates and shares sexual images of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and this should be reported to the police.

### **Handling Incidents**

1. All incidents involving youth produced sexual imagery should be reported to the Safeguarding Team.
2. An initial review meeting will be held and subsequent interviews with the young people involved, if appropriate.
3. Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

4. At any point in this process if there is a concern that a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

An immediate referral to the police and/or children's social care will be made at this initial stage if:

1. The incident involves an adult.
2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent, for example due to a learning difficulty.
3. What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's development age or are violent.
4. The imagery involves sexual acts and any child in the imagery is under 13.
5. There is reason to believe that a young person is at risk of harm owing to the sharing of imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply GBS may decide to respond to the incident without involving the police or children's social care. Although the sharing of sexual imagery is illegal, the National Police Chief's Council (NPCC) is clear that 'youth produced sexual imagery should be primarily treated as safeguarding issue' and the law was also created to protect children and young people and not to criminalise them.

### Relationship Abuse

- **Emotional abuse** – can include constant insults and name calling, isolation from friends and family, controlling what someone wears/where they go, checking up on someone all the time (checking emails, texts, social networking sites etc.) and making someone feel responsible for the abuse.
- **Physical abuse** – can include hitting, punching, pushing, biting, kicking, using weapons etc.
- **Sexual abuse** – can include unwanted kissing or touching, forcing someone to have sex, being made to watch pornography against their will and pressure not to use contraception.
- **Financial abuse** – can include the taking and controlling of money, forcing someone to buy things for someone, forcing someone to work or not to work.
- **Trafficking** is defined as 'the recruitment, transportation, transfer, harboring or receipt of children by means of threat, force or coercion for the purpose of sexual or commercial sexual exploitation or domestic servitude'(NSPCC).
  - The Palermo Protocol establishes children as a special case for whom there are only two components- movement and exploitation. Any child transported for exploitative reasons is considered to be a trafficking victim-whether or not he/she has been deceived, because it is not considered possible for children to give informed consent.
  - A child may be trafficked without crossing any national borders, e.g only within the UK.
  - A child may be trafficked between a number of countries prior to being trafficked into/within the UK. The child may have entered the UK illegally or legally (i.e. with immigration documents). The intention to exploit the child underpins the entire process.
  - The Modern Slavery Act 2015 consolidates current offences of trafficking and slavery and details the different forms of exploitation that a victim of trafficking may be forced into.
  - The exploitation can take place in a number of ways including:
    - Sexual Exploitation
    - Labour Exploitation
    - Criminal Exploitation
    - Domestic Servitude
    - Organ Harvesting
  - Distinction between human trafficking and smuggling:
  - Human trafficking does not include people smuggling, which requires the consent of the person being moved. A smuggled person is, however a potential victim who may be vulnerable to being trafficked at any point in their journey, and the distinction can be blurred. Perpetrators may smuggle people with the intention of exploiting them, or with the intention

of facilitating exploitation. Alternatively, the smuggled can become vulnerable to traffickers upon arrival at their destination and subsequently be exploited and/or harmed.

**Financial or Material Abuse:** This can include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse, misappropriation of property, possessions or benefits.

## Appendix B

The Managing Director (Penny Guard) is GBS's designated Safeguarding Officer (DSO). If at any time a learner and, or a GBS staff member would like to speak to the DSO they are able to do so via email; [penny.guard@gbs-ltd.co.uk](mailto:penny.guard@gbs-ltd.co.uk) , and via phone on 07917 619034.