



SAFEGUARDING & PREVENT POLICY V4

SBA Nationwide Ltd

SBA NATIONWIDE LTD

Safeguarding and Prevent Policy

CONTENTS

1 Statutory Framework	Page 3
2 Responsibilities	Page 9
3 SBA Nationwide Ltd Safeguarding Guidance	Page 12
4. Social Contact	Page 13
5. Confidentiality	Page 16
6. Staffing	Page 18
7. Process and Procedures	Page 19
8. Handling Abuse/Allegations/other	Page 20

APPENDIX

Appendix A: Disclosure and Reporting Process	Page 29
Appendix B: Type of Abuse and Possible Signs of Abuse	Page 35
Appendix C: Guidance and Advice Sources	Page 47

1. Statutory framework

SBA Nationwide Ltd recognises its duty to work with other agencies to protect vulnerable young people from harm and to respond to Safeguarding and Prevent concerns.

In the management of its programmes, the discharge of its functions, and in implementing this Policy and Procedure, SBA Nationwide Ltd will remain mindful of its duty of care and other legal obligations such as those it owes under the Health and Safety at Work Act 1974, the General Data Protection Act 2018 the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015.

This Policy has regard to the following guidance and advice:

- Keeping children safe in education (2018) (KCSIE);
- Working Together to Safeguard Children (2018);
- Disqualification under the Childcare Act 2006 (2018);
- Prevent Duty Guidance for England and Wales (2015);
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015);
- Multi-agency statutory guidance on FGM (2016);
- What to do if you're worried a child is being abused: advice for practitioners (2015);
- Information sharing: advice for practitioners providing safeguarding services (2018);
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), 2016);
- Children missing education (2016);
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (2017)
- Sexual violence and sexual harassment between children in schools and colleges (2018)

SBA Nationwide Ltd is committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or vulnerable adult and thereby ensuring a safe and friendly environment, where they feel safe – this includes from radicalisation and extremism. SBA Nationwide Ltd values freedom of speech and the expression of believe and ideology as fundamental rights of British society.

SBA Nationwide Ltd believes that:

- Every learner has the right to exist in a safe, caring and inclusive learning and working environment
- All learners should be valued and respected as individuals and treated with dignity at all times
- Bullying in any form is strictly unacceptable
- Racist, homophobic and sexist language or behaviour is strictly unacceptable
- Every learner has the right to learn and/or work in a democratic environment where any signs of radicalisation and extremism are promptly dealt with
- Any form of discrimination, abuse, harassment or victimisation are strictly unacceptable
- All learners have the right to expect an adult in a position of responsibility to listen to them when they need to express themselves

All staff must recognise that ignoring abuse is not an option and must report any concerns for the well-being of learners in accordance with this Policy and Guidance, which has the full commitment of SBA Nationwide Ltd’s Senior Management Team.

This Safeguarding policy should be read in conjunction with the Safeguarding guidance section and the following’s policies:

- Safeguarding and Prevent process flowcharts and forms
- Equality and Diversity Policy
- Disclosure and Barring Service (DBS) Policy
- Health and Safety Policy
- Speak Up Policy
- Anti-Harassment & Bullying Policy
- General Data Protection Act 2018
- Open Door Policy
- Freedom of Expression Policy
- Information Technology Security Policy

- Visiting Speaker Policy
- SBA Nationwide Ltd Staff Handbook
- Staff Code of Conduct

All policies can be found on SBA Nationwide Ltd's SharePoint along with further resources in the Safeguarding section.

The following abbreviations are used throughout this document:

- SPOC – Single Point of Contact
- DSO – Designated Safeguarding Officer
- LADO – Local Authority Designated Officer
- PL - Prevent Lead

Throughout this policy and guidance, reference is made to “children and young people” (hereinafter referred to as learners). This terminology is used to mean “those under the age of 18”. The definition of a vulnerable adult includes (but is not restricted to) individuals with any of the following:

- Learning Difficulties
- Disability (physical or mental)
- Physical Impairments
- Sensory Impairments
- Mental Health Needs
- Age Related Frailty
- Dementia
- Brain Injuries
- Drug, Alcohol or Substance Problems

Safeguarding looked after children and young people

The term Looked after refers to children and young people who are in the care of the Government or who are provided with accommodation for more than a continuous period. Children and young people who live away from home for other reasons whilst not being ‘looked after’ may still be vulnerable.

What is Safeguarding and wellbeing?

The term ‘Safeguarding’ describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children and adults from potential harm or damage. Safeguarding vulnerable adults and young people delivers preventive action and not just a reaction. SBA Nationwide Ltd believes that safer recruitment is an important aspect of Safeguarding.

‘Well-being’ is a general term for the condition of an individual or group, for example their

social economic, psychological, spiritual or medical stage; high level and low level happenings can be associated with positive or negative feelings.

There is a statutory and moral duty to ensure that SBA Nationwide Ltd safeguards all learners and promotes their welfare at all times.

Although preventative measures are never infallible, there remains a pressing responsibility to ensure that the most robust safety network possible is in place where young people and vulnerable adults are concerned.

The welfare of children and vulnerable adults is everyone's responsibility. SBA Nationwide Ltd employees are expected to follow the procedures in this policy to ensure that all allegations or suspicions of abuse or significant harm to a child or vulnerable adult are reported to the relevant statutory agency. We will share all relevant information with the respective statutory agencies (Social Services, Police and / or Channel).

What is Prevent?

The Government first set out the 'Prevent' Strategy in 2011. Under the Prevent Duty, there is a greater awareness needed to safeguard all individuals from extremism, ideologies and radicalisation and from July 2015 also includes the active promotion of 'Fundamental British Values'. In respect of safeguarding individuals from radicalisation, the organisation works to the 'Prevent' element of the Governments' Counter Terrorism Strategy. This includes links with and/or referral to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system as a result of their actions. It is recognised that radicalisation can occur in an individual from any section of society and is not particular to any racial, ethnic or social group. The organisation will take steps to challenge any views deemed to be extreme and report concerns through the Safeguarding reporting process.

We will assess the risk of people being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, and becoming radicalised. All SBA Nationwide Ltd staff receive regular training, raise awareness and actively promote the Prevent duty and fundamental British Values. We record and report on all concerns or issues relating to. If in the extreme case a serious Prevent incident occurs all staff are aware of the anti-terrorism Hotline number: 0800 789321.

The prevent duty refers to all staff, volunteers and contracted staff.

SBA Nationwide Ltd has zero tolerance of abuse and other harmful behaviours and recognises that safeguarding and the promotion of safe behaviour is part of our business as usual.

This policy has been developed to:

- Ensure that all staff in contact with learners take all reasonable measures to assess and minimise the risk of harm to them

- Where there are concerns about the Safeguarding, Prevent or welfare of learners, to ensure prompt and appropriate action is taken to address these concerns
- Provide staff with guidance on procedures they should adopt in the event that they suspect a learner may be experiencing, or be at risk of, harm or radicalisation
- Promote the opportunity for learners to voice their concerns and provide clear robust procedures and confidential help

To achieve this, SBA Nationwide Ltd will:

- Provide a safe environment for all learners and employees, by ensuring thorough risk assessment, safe working practices are put in place and by implementing a procedure for handling concerns or direct disclosures. To support this, SBA Nationwide Ltd will consider and act on a 'Notice, Check and Share' strategy and include this in all training relating to Safeguarding and Prevent
- Have a SPOC and Prevent Lead who will report to the Head of Quality and will take the strategic lead in relation to Safeguarding Prevent/Learner Protection issues. They will provide the appropriate information, advice, guidance and support to SBA Nationwide Ltd staff and associates and work with other agencies when necessary. In addition, SBA Nationwide Ltd staff and learners are supported by a team of DSOs
- Ensure all staff operating procedures and learner information includes reference and information about this policy and these roles
- Raise issues relating to the Safeguarding, Prevent and welfare of learners with staff and senior managers, following the processes outlined in the guidance section of this
 - document
- Provide clear and concise training for all staff that come into contact with learners appropriately and provide regular updates on Safeguarding and Prevent
- Keep staff and managers up-to-date with legislation in relation to children, young people and vulnerable adults in respect of Safeguarding, welfare and Prevent
- Raise employee awareness of Safeguarding and Prevent issues such as minimising risk, recognising abuse, treating all learners with respect and having an understanding of the signs that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups
- Take appropriate action to ensure that learners are kept safe and issues, concerns or disclosures are reported appropriately
- Identify and act wherever it is found that learners are suffering, or likely to suffer, significant harm
- Establish procedures for reporting and dealing with allegations of abuse and radicalisation
- Equip learners with the skills they need to keep themselves safe online and in the workplace
- Listen to learners, encourage them to respect and care for others and take action to stop any inappropriate verbal or physical abuse taking place
- Operate safe recruitment of staff, ensuring that through risk assessment, appropriate questions and checks are undertaken at application, interview and throughout employment
- Ensure SBA Nationwide Ltd meets the requirements of the Disclosure and Barring Service
- Ensure that subcontractors and partners have appropriate Safeguarding and Prevent

policies and procedures and that these are checked when tendering for work with SBA Nationwide Ltd

- Have an effective information-sharing protocol with key partners such as employers in order to report concerns to outside agencies, where appropriate
- Ensure that any external speakers or visitors are vetted and accompanied at all times
- Ensure appropriate legislation is checked for currency and update this policy accordingly
- Work in partnership with Local Safeguarding Boards, Prevent Coordinators and other Child Protection Agencies, where applicable
- Annually reviewing policies and procedures regarding Safeguarding and Prevent
- Review the effectiveness of policy and procedures where there has been a Safeguarding or Prevent concern

Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE 2018. Staff should be particularly aware of the safeguarding issues set out below.

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-andvulnerable-adults-county-lines>

2. Responsibilities

Professional Boundaries

SBA Nationwide Ltd expects staff to protect the professional integrity of themselves and the organisation. The SBA Nationwide Ltd Staff Code of Conduct details if the professional boundaries and/or policies are breached. This could result in disciplinary procedures or enactment of the allegation management procedures.

It is vital that all complaints, disclosures, allegations or suspicions of abuse to children under 18 or vulnerable adults are dealt with fairly, quickly and consistently.

There are three main strands to be considered:

- An investigation of an actual or potential criminal offence by the police
- Involvement of Social Services
- Investigation by SBA Nationwide Ltd and/or an employer and consideration of any disciplinary action on staff or learners

Allegations of Abuse against SBA Nationwide Ltd Staff

Allegations of abuse, or concerns raised against members of SBA Nationwide Ltd staff, will always be treated seriously. The allegation must always be referred to the SPOC who will follow the Safeguarding procedure in the same way as for other Safeguarding allegations (see SBA Nationwide Ltd/CTP Safeguarding Guidance & Procedures). The DSO will take the appropriate steps to ensure the safety of the learner, and any others who may be at risk. The

DSO will also inform the SPOC and will escalate to the Head of Quality in order that SBA Nationwide Ltd procedures may be followed and an appropriate investigation is carried out.

Where there is a complaint against a member of staff, there may also be criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services. Actions should be taken both to protect the learner and the accused member of staff.

These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place. If the allegation or concern is against a DSO, it should be reported directly to the SPOC.

If an allegation is levelled against any member of SBA Nationwide Ltd staff, line management must be informed immediately; actions may require full and proper investigation in line with SBA Nationwide Ltd disciplinary processes which may include:

- Giving the staff member leave of absence on full pay
- Suspending the staff member
- Ensuring that the staff member is not working alone with learners

Confidentiality Statement

SBA Nationwide Ltd will operate on the premise that all information imparted to a member of staff will be treated in confidence. Confidentiality is a key issue in the lives of learners. They may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must not make promises on confidentiality which they may be unable to keep.

Furthermore, staff should always make a learner fully aware of any situation where a duty of care deems that confidentiality cannot and must not be maintained. This would be the case in child and vulnerable adult protection situations. Learners may disclose information that is difficult for the member of staff to deal with without further advice/support. In such cases, the learner should be told that the situation will be discussed with another colleague with a speciality in that area but confidentiality will be maintained if possible. (More details in 1.5 of the Safeguarding Guidance section).

Information Sharing

SBA Nationwide Ltd is committed to sharing information for the purposes of Safeguarding and promoting the welfare of children and young people in line with Working together to safeguard children (2018) and with respect for The General Data Protection Act 2018.

Any decision to break confidentiality should always be preceded by informing the learner of what is about to happen and the reason for the decision.

There will be no breach of confidence if the person to whom a duty of confidence is owed

consents to the disclosure. Staff should, in the first instance, seek the consent from the learner if considering sharing information with other agencies. It is therefore essential that members of staff understand what is meant by the above and for that reason do not promise absolute confidentiality to the learner.

Training

As part of the SBA Nationwide Ltd Induction, there is a minimum requirement that each member of SBA Nationwide Ltd staff will undertake the online Safeguarding training modules, Social Media and Information Security Awareness, Channel & Prevent Duty Awareness Training and Equality, Diversity and Inclusion Training. Each member of SBA Nationwide Ltd staff will also complete regular mandatory refresher training in relation to Safeguarding and Wellbeing, the Prevent Duty and fundamental British Values.

Staff development training will also include training on online safety, additionally SBA Nationwide Ltd will make assessments of the appropriate levels of focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, forced marriages, female genital mutilation, cyberbullying and mental health to ensure that staff have the training they need to keep learners safe. DSOs and the SPOC will attend mandatory standardisation training which will be deemed appropriate and commensurate in line with their roles and responsibilities. The SPOC will maintain records of all Safeguarding and Prevent training for staff on SharePoint.

Teaching learners about safeguarding

SBA Nationwide Ltd staff teaches all learners about safeguarding through their learning journey with us. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

All staff are directed to encourage all learners to respect other people in particular with the protected characteristics set out in the Equality and Diversity Act 2010 and to challenge extremism and be aware of what preventative actions to take. Learners are reminded about harmful sexual behaviours, including sexual violence and sexual harassment, through learner intervention.

Learners are provided with the opportunity to talk about safeguarding issues within the learning environment and on a 121 basis. They are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern as well as how any report will be handled.

Monitoring and Review

The Head of Quality is responsible for implementing and monitoring the Safeguarding Policy. The number of Safeguarding cases will be reviewed annually by the SPOC. Reports from monitoring and review activities will be reviewed by the Head of Quality and presented to SBA Nationwide Ltd Senior Management Team on a monthly basis.

This policy and the associated guidance and procedures document will be reviewed annually by the SPOC and Head of Quality Development and Assurance within four weeks of a review of any serious Safeguarding/Prevent incident.

Access to Policy Documentation, Advice and Support

This policy and the associated guidance and procedures document is to be made available to all staff and learners in various formats appropriate to SBA Nationwide Ltd audiences, e.g. in Learner Handbooks, on e- platforms and on SBA Nationwide Ltd SharePoint system

3. SBA Nationwide Ltd Safeguarding Guidance

Introduction

Staff (in the context of this policy, 'staff' is taken to also apply to all SBA Nationwide Ltd partners and associates) should conduct themselves in such a way as to avoid compromising situations and to protect themselves against allegations of abuse. The following guidelines have been developed to support staff working in all settings to establish safe & responsible environments which safeguard learners and manage the risk of adults being unjustly accused of improper or unprofessional conduct. This is reiterated in the SBA Nationwide Ltd Staff Code of Conduct.

One-to-One Situations

Guiding Principle

- Ensure that SBA Nationwide Ltd staff can work with learners without them feeling vulnerable, and to manage and reduce the likelihood of allegations being made against staff
- The following guidance is provided to ensure SBA Nationwide Ltd staff are aware of their responsibilities when conducting any one-to-one session

In certain situations, it may be unrealistic to state that one-to-one interactions should not take place. Where there is a need to work in one-to-one situations, the manager must be informed beforehand what the nature of the one to one session will be about.

When using the internet for learning activities staff should:

- Restrict access to illegal, harmful or inappropriate images and other content
- Educate learners in e-safety practice, e.g. not sharing personal information or inappropriate communication with strangers
- Ensure that learners know how and to whom e-safety incidents should be reported
- Undertake only professional related communication directly with learners

It is important the SBA Nationwide Ltd member of staff ensures that they:

- define and record the reason for the meeting
- identify the meeting location
- conduct and agree a full risk assessment
- avoid conducting one-to-one meetings in remote/secluded areas
- always inform other line managers/colleagues/guardian(s) and assess the need to have them present or close by
- always report situations which are or could be interpreted as Safeguarding incidents

4 Social Contact

Staff should not work with young people 'unofficially' outside SBA Nationwide Ltd. This means:

- Staff must not take learners to their own homes or transport learners in their own vehicle
- Not having social contact with the learners or their families, unless the reason has been firmly established and agreed with their line manager
- If a learner or parent seeks to establish social contact or if this occurs coincidentally, the staff member(s) must exercise their professional judgement in making a response but should always discuss the situation with their line manager
- Staff should be aware that social contact in certain situations can be misconstrued as grooming. As such they should advise their manager or in their absence, the Programme Manager or SPOC of any coincidental social contact they have with a young person or parent with who they work which may give rise to concern
- Staff should be aware that the sending of personal communications such as birthday or faith cards should always be recorded and/or discussed with their line manager
- Staff should record & report any situation which may place a young person at risk or which may compromise SBA Nationwide Ltd or their own professional standing.

(The above are provided as examples and are not intended to be exhaustive).

Guidance for Engaging Learners Through Digital Media

Communicating effectively with learners in a variety of ways is an integral aspect of SBA Nationwide Ltd's work. Telephone contact, texting, e-mail, face to face work and detached work are all vital tools for supporting learners' personal and professional development. Learners use electronic methods of communication as a primary vehicle, with much of their social interaction and peer education occurring in these spaces.

Given the pace of change in this area, the principles outlined in these guidelines should be seen as applying to emerging technologies and/or applications:

- Staff should ensure young people are using electronic methods of communication
- electronic communication methods provide opportunities for promoting services; they encourage learners to participate in positive activities, and to become involved in developing the service

However, electronic communication methods are also utilised by individual's intent on 'grooming' young people. To protect both individual staff members and SBA Nationwide Ltd from the consequences of allegations relating to the use of digital media, staff should cooperate fully with any requests or processes instigated to address these risks.

The following procedures have been prepared with the above principles in mind.

Universal Digital Media Guidelines

- Staff should apply the same rules and standards of best practice when communicating with learners via digital media as in face to face communication
- Extra diligence must be taken to ensure messages cannot be misinterpreted
- Staff should use messaging via new media as a method of communicating information and not as a primary communication tool to build relationships i.e. to inform of an event or a change of time
- If staff receive a message from a learner wishing to engage in a 'social conversation', they must send a message to explain that they cannot engage in social messaging and direct them to an appropriate email address, telephone contact or website they can access
 - for further help if they should need it
- If staff receives a verbally abusive or threatening message, or if they worry about the safety of the sender or someone else, they must contact their line manager and a SBA Nationwide Ltd DSO/SPOC

SMS/Text Messaging

- Mobile phones are allocated to staff as an operational necessity
- Under no circumstances should staff give their personal mobile or home number to a learner
- Mobile telephones are issued for business use; any misuse of the phone may be a disciplinary issue
- If necessary, staff work mobile numbers can be publicly displayed i.e. on posters, clearly stating the staff members name

Email

- All staff will be given an email address on joining SBA Nationwide Ltd
- Under no circumstances should a staff member give their personal email address to a learner
- Emails should only be sent to learners during what could be perceived as 'reasonable hours' (e.g. 7am-8pm depending on learner workplace practices)
- Work email addresses can be given to learners who are engaging in personal and professional development activities with SBA Nationwide Ltd and have a need to receive information
- Materials sent will be unbiased and meet equal opportunities criteria in terms of ethnicity, sexual orientation, gender, disability, religion, and beliefs and age
- If necessary, staff email addresses can be publicly displayed i.e. on posters, clearly stating the staff members name

Social Networking

- Prior consent/sign-off should be sought from SBA Nationwide Ltd's Marketing & Communications department before first use of Social Networking Sites to communicate with learners
- Staff intending to use Social Networking Sites in a work capacity should do so from a separate profile than their personal profile, should they have one
- In the event that a member of staff sets up a work profile, they must inform their line manager of the existence of this profile and the login details for it
- In order to protect themselves from risk of allegations, we recommend that staff using Social Networking Sites with a personal profile - in a private capacity - should set their privacy settings so only friends can view their profile
- Under no circumstances should a staff member with a personal profile add a learner

- they work with or have worked with within the last five years as a friend on a Social Networking Site
- Staff should not put photographs of work activities on their personal profiles
- Staff must familiarise themselves with the SBA Nationwide Ltd Social Media and Information Security Awareness Policy
- Messages sent via Social Networking Sites should only be sent to learners during 'reasonable' hours (as per email section above)

Instant Messaging

- Under no circumstances should staff communicate with a learner through an instant messaging site
- Under no circumstances should staff give their instant messaging address to a learner
- If a staff member receives an instant message from a learner, they must not engage and should inform their line manager and a SBA Nationwide Ltd DSO immediately

Recording for Marketing Purposes

- We are committed to capturing learner's views and involving them in planning for the future. In order to do this, it is from time to time beneficial to record learners either individually or as a group. We also seek to record activities so we can showcase what we do and why it works. However, in all cases where recording is undertaken, whether audio, video or photographic, prior permission must always be obtained. Staff must ensure that where a learner is under 18, or is deemed vulnerable, that
 - permission to record images or voice is obtained from a parent, or other person holding parental responsibility
- Any restrictions stipulated by parents or other carers i.e. voice recording only, must be respected
- It is essential that all members of a group have valid permissions obtained before undertaking group recording
- Particular care must be taken to ensure that images and recordings are only used for legitimate purposes, and that they are not released to non SBA Nationwide Ltd staff without specific agreement being obtained about how such images are to be used

5. Confidentiality

Members of staff may have access to confidential information about learners in order to undertake their everyday responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information

about a learner for their own, or others' advantage (including that of partners, friends, relatives or other services).

Information must never be used to intimidate, humiliate, or embarrass the learner.

Confidential information about a learner should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the

learner's identity does not need to be disclosed the information should be used anonymously.

Personal information about learners is treated with respect and confidentiality. Consent will be sought to share personal information. However, information can be shared without consent when:

- Asking for consent will increase the risk of harm to a child or vulnerable adult or; A delay in sharing information may increase the risk of harm to a child or vulnerable adult

More information can be found at:

HM Government (2015) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

SBA Nationwide Ltd staff are expected to treat any information they receive about a learner in a discreet and sensitive manner.

If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from a SBA Nationwide Ltd DSO or the SPOC. Any media or legal enquiries should be passed to their line manager and the SBA Nationwide Ltd Marketing & Communications team.

A confidential record will be kept of all cases referred to the Designated Safeguarding Team, including details of cases referred to the Local Authority or the police. These written records will be kept securely for a period of six years via a restricted site on SBA Nationwide Ltd SharePoint with any paper information held securely by the SPOC.

The storing and processing of personal information about a learner is governed by the General Data Protection Act 2018. SBA Nationwide Ltd adopts SBA Nationwide Ltd's Data Protection

policy and processes which should be adhered to at all times. The Government booklet "What to Do If You're Worried a Child Is Being Abused" contains further guidance on sharing information to protect children. <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

More information regarding SBA Nationwide Ltd privacy notice can be found by clicking here: [SBA Nationwide Ltd Privacy Notice](#)

6. Staffing

Staff Recruitment

(To include the recruitment of: permanent and fixed-term staff; sessional, associate workers and volunteers)

- All appointments are made following a face-to-face interview that explores attitudes, motivation, temperament and personal qualities as well as skills and experience relevant to the role
- All offers of employment/work are made conditional to satisfactory references and a DBS check dependent on the nature and responsibilities of the post
- All appointments are subject to the SBA Nationwide Ltd Group Recruitment and Screening Policy and process
- All staff/workers are subject to a DBS check at the relevant level. For all staff working directly with learners, this will be at the enhanced level
- If it is necessary for someone to start work at short notice, before checks are completed, a risk assessment is carried out, documented, and kept confidentially. Until their DBS disclosure is received by SBA Nationwide Ltd, the individual is supervised by a DBS-checked member of staff
- Where candidates are recruited from overseas, extra care is taken in pursuing references and carrying out the relevant checks. Where appropriate, advice from the DBS Overseas Information Service is obtained
- All staff/workers are made aware of SBA Nationwide Ltd's Safeguarding Policy and

procedures, and their obligations regarding child protection, as part of their induction. Staff/workers with face-to-face access to learners will receive additional on-going training as appropriate

7. Processes and Procedures

This section covers the processes and procedures to follow in response to key Safeguarding and/or Prevent incidents, i.e.:

- Concerns about learners
- Disclosure of abuse made by learners
- Flowchart of disclosure procedures
- Allegations of abuse against SBA Nationwide Ltd staff
- Handling information from third parties
- Flowchart of third party procedures

Concerns about learners

If a staff member has any concern regarding a learner's safety and welfare, they must take the following action (please also see Appendix A: Disclosure):

1. The staff member must inform their DSO, SPOC and line manager of the situation as soon as possible. If they are unavailable within office hours, staff should use the Knowledepool Safeguarding Hotline. If no-one in the line-management chain is available, they should go directly to the Head of Quality and Operations Director.
2. If the DSO and/or line manager agrees that there is a concern regarding a learner's safety and welfare, they should make a referral to the SPOC. The SPOC will make appropriate referrals without delay. In most situations, it will be appropriate to inform the learner that a referral is going to be made, to explain the reasons for this and to offer to support the learner through the resulting investigation. If the staff member remains concerned regarding their learner, they are entitled to make a referral to the relevant authorities regardless of whether the DSO, SPOC and/or the line manager shares this concern.
3. The only exceptions to 2. is if that in the view of the DSO & SPOC, informing the learner that a referral was going to be made would:
 - impede the investigation
 - place the learner at greater risk or place the member of staff concerned at risk
4. If such exceptions apply and the learner is under the age of 18, a referral should be made directly to the relevant Children's Services Department without informing the learner first.

SBA Nationwide Ltd staff should not investigate the matter. That is for Children's Services and perhaps the Police. SBA Nationwide Ltd staff must only gather sufficient information to establish and record that there is concern about risk of harm to a child.

If the learner has a named social worker, they should be contacted with the referral. If the named worker is not available, or if there is no named worker, the SPOC should ask to speak to the Children's Services Duty Manager, explaining that they wish to make a child protection referral.

When making the referral, the SBA Nationwide Ltd staff member should note the name of the person in Children's Services who they have contacted and the date and time when the referral was made. They will also need to clarify what action Children's Services are proposing to take and the timescale for this. Any referral made by telephone will need to be followed up with a written referral.

If the Line Manager, DSO, and SPOC have not already been informed of the situation, the staff member should do this as soon as possible. There will need to be a discussion as to how the young person and all the staff directly involved in the situation can best be supported for the duration of the investigation.

All incidents, concerns and referrals in relation to learners and the action that results from these should be recorded and kept confidential.

8. Handling a Disclosure of Abuse Made by a Learner with whom SBA Nationwide Ltd is Working

Staff may observe signs that leads them to suspect that a learner may have been physically, emotionally, or sexually abused, or suffer severe neglect, or are becoming radicalised; or in addition, in the case of a vulnerable adult, they may be experiencing financial, discriminatory or institutional abuse. Please read with Appendix A: Disclosure.

Lists of possible signs of abuse are included in Appendix B for further information.

In addition to these, a person may be being abused by virtue of their race, gender, age, disability or sexual orientation which would indicate discriminatory abuse. Similarly, any of the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.

If a learner, with whom SBA Nationwide Ltd is working, discloses abuse, or risk of abuse, to a member of staff or volunteer, he or she must take the following action. In the first instance it should be established whether the learner is legally a child (someone under 18 years old) or a young adult.

It is not the staff member's responsibility to investigate what has happened or to establish whether or not abuse has taken place, however, the following approach should be adopted:

If the Person is legally a child, the staff member should:

- Listen carefully to what the learner is saying
- Explain that because this is a serious matter, it cannot remain confidential between the staff member and the learner. The staff member should inform the young person that she/he will need to inform their line manager and to talk to a DSO. They must do this before they can decide on what action may be necessary to ensure that the learner is safe in the future and ensure the safety of any other learner who may be in contact with the alleged abuser
- Undertake to keep the learner informed as to any action that is proposed and to support the learner through this

The worker must inform their line manager and consult with an SBA Nationwide Ltd DSO as soon as possible. If a DSO is unavailable, then the SPOC should be contacted as soon as possible. In the event the SPOC is not available, a member of the SBA Nationwide Ltd Senior Management Team should be contacted. The Safeguarding/Prevent hotline is available Monday – Friday between the hours of 9am until 5.30pm on 0333 014 4402. SBA Nationwide Ltd staff can also email the Safeguarding and Prevent inbox safeguarding@sbanationwide.com. If in the extreme case a serious Prevent incident occurs, all staff are aware of the anti-terrorism hotline number: 0800 789321. The SBA Nationwide Ltd Management team will decide whether or not to make a referral to local Children's Services or the Police. All serious allegations of abuse should be referred to Children's Services, however if in any doubt, a consultation should take place with the relevant Children's Services duty team. This is not only to protect the young person themselves but also any other children or young people that the alleged abuser may be in contact with.

If the situation arises out of office hours, the SBA Nationwide Ltd staff member should contact the SPOC and appropriate steps of escalation must be taken.

If the concern arises out of office hours and it is not possible to contact any appropriate SBA Nationwide Ltd manager or safeguarding support, and where a learner has disclosed serious abuse, then a referral should be made directly to local Children's Services or the Police. Rather than placing a learner at risk by unreasonable delay in the making of a referral, and it proves difficult to get hold of the contact details of the relevant Children's Services, then contact with the Police locally (ideally via a non-emergency number) should be made. Contact with the duty officer of the Child Protection Team should be requested.

When making the referral, the SBA Nationwide Ltd manager or safeguarding support staff should note the name of the person in Children's Services who they have contacted, and the

time and date when the referral was made. They will also need to clarify what action Children's Services are proposing to take and the timescale for this. They should also establish how the child/young person's immediate safety is to be ensured.

All telephone referrals should be followed up in writing within 2 working days. All incidents, concerns and referrals in relation to children and young people and the action that results from these should be recorded

If the Person is a vulnerable adult, the staff member should:

- Listen carefully to what the learner is saying
- Explain that because this is a serious matter, it cannot remain confidential between the staff member and the learner. The staff member should inform the learner that she/he will need inform their line manager and to talk to a DSO. They must do this before they can decide on what action may be necessary to ensure that the learner is safe in the future; and ensure the safety of any other learner who may be in contact with the alleged abuser
- Undertake to keep the learner informed as to any action that is proposed and to support the learner through this

The worker must inform their line manager and consult with a SBA Nationwide Ltd DSO as soon as possible. If a DSO is unavailable, then the SPOC should be contacted as soon as possible. In the event the SPOC is not available a member of the SBA Nationwide Ltd Senior Management Team should be contacted.

At this stage any disclosure that may or does constitute a criminal offence should be referred by the DSO/SPOC to the Police. If necessary the DSO/SPOC should inform and liaise with the relevant LADO. If the learner is at immediate risk then the Staff Member, DSO, SPOC or SBA Nationwide Ltd senior manager should contact the Police immediately

Handling Concerns / Information From Third Parties

Third party information is when anyone (other than those directly involved with SBA Nationwide Ltd) passes on information or expresses their concerns.

Information from a third party regarding suspicions of child abuse cannot be ignored. If the person imparting the information has concerns, they should be encouraged to contact their local Children's Services themselves, in order to discuss their concerns with a qualified social worker. If they do not wish to do so, it should be explained to them that SBA Nationwide Ltd is obligated to. The concerns should be logged as confidential and any action taken recorded fully.

- In the first instance, it should be established whether the young person is legally a child (someone under 18) or a vulnerable adult

If the Person is legally a Child or a Vulnerable Adult, the worker should clarify with the third party and record the following:

- The nature of their concerns
- How and why their concerns have arisen
- Whether they wish to remain anonymous
- What involvement they are having or have had with the learner

The worker must inform their line manager and a DSO of the situation as soon as possible. If the concern arises out of office hours and it is not possible to contact any manager or safeguarding support, and where the information relates to serious abuse, rather than placing a child/young person at risk by unreasonable delay in the making of a referral, a referral should be made directly to Children's Services, or the duty officer in the local police child protection team.

The SBA Nationwide Ltd staff member should ask to speak to the Children's Services Duty Manager within the Local Authority, explaining that they wish to make a child protection referral. If the situation arises out of office hours, the SBA Nationwide Ltd staff member should contact the local out of hours/emergency social worker. If for any reason the emergency social worker is not available, then the duty officer in the local police child protection team should be contacted.

When making the referral, the SBA Nationwide Ltd DSO/SPOC should note the name of the person in Children's Services who they have contacted and the time and date when the referral was made. The line manager will also need to clarify what action Children's Services are proposing to take and the timescale for this, and also how the child/young person's immediate safety is to be ensured.

All Telephone referrals should be followed up in writing within 48 hours (2 working days).

If the SPOC has not already been informed of the situation, they should be contacted as soon as possible (in the absence of the SPOC, any member of the SBA Nationwide Ltd Senior Management team should be contacted). There will need to be a discussion as to how the child or young person and all the staff directly involved in the situation can best be supported for the duration of the investigation.

All incidents, concerns and referrals in relation to young people and vulnerable adults and the action that results from these should be recorded and stored in a confidential location.

SBA Nationwide Ltd staff should not investigate the matter. That is for Children's Services and perhaps the Police. SBA Nationwide Ltd staff must only gather sufficient information to establish that there is concern about risk of harm to a child / vulnerable adult.

If the person is neither a child nor a vulnerable adult, this is not a safeguarding issue. However, consider other lines of support / referral e.g. the Police.

Appendix A provides the reporting process to be taken in the event that a third party discloses abuse or risk of abuse to a member of SBA Nationwide Ltd staff.

Handling Allegations of Abuse Made Against SBA Nationwide Ltd Staff

1. Any allegation of abuse against a SBA Nationwide Ltd member of staff must be taken seriously, both for the sake of the child/young person involved and the member of staff themselves. Allegations of abuse by a member of staff include:
 - Behaving in a way that has harmed a child, or may have harmed a child/young person
 - Committing a criminal offence against or related to a child/young person
 - Behaving towards a child/young person in a way that indicates she or he is unsuitable to work with young people
2. If it is a learner making the allegation, the member of staff receiving the allegation should remain calm and inform the learner that:
 - It is a serious matter and will need to be discussed with the appropriate manager in order to decide how the matter will be investigated
 - The learner will be kept informed about the progress of the investigation
3. The member of staff receiving the allegation should immediately contact the manager of the worker against whom the allegation has been made and the SPOC.

The worker who is the subject of the investigation must NOT be informed of the allegation at this point.

4. The manager of the worker against whom the allegation has been made and the SPOC should refer the matter immediately to the Head of Quality or in their absence the Operations Director. This 'responsible senior manager' will decide:
 - Whether there are sufficient grounds for taking further action
 - If there are sufficient grounds for taking further action, the decision as to whether the incident is serious enough to be considered as potential child abuse will be informed by a consultation with the relevant LADO
 - Whether or not to contact Social Services the police and / or Channel.

The LADO will be kept informed of all decisions taken by SBA Nationwide Ltd in relation to the allegation and the person/s subject to the allegation. If following this

consultation with the LADO the allegation does not amount to child abuse, the 'responsible senior manager' in consultation with the SPOC will consider whether the case should be dealt with under SBA Nationwide Ltd's disciplinary policy.

5. In cases where there is insufficient information to make this decision, the 'responsible senior manager' will need to decide, as a matter of urgency, what information is needed and how this should be obtained, so that a decision can then be taken as to whether or not this situation should be considered as a matter of potential child abuse.
6. If the 'responsible senior manager,' in consultation with the LADO, decides that the situation should be considered as potential child abuse, she or he should refer the matter to the relevant Children's Services department and request that an emergency planning/strategy meeting be convened to plan the process of the investigation including the interviewing of the member of staff who is the subject of the allegations.
7. The 'responsible senior manager' will also need to decide whether for the duration of the investigation the member of staff should continue in their work, be moved to other duties, or be suspended in accordance with the SBA Nationwide Ltd disciplinary policy and procedures.

In making this decision the 'responsible senior manager' will need to take into account:

- The need to avoid further contact between the learner and the named member of staff
 - The feasibility of the named member of staff continuing to work in their post whilst a child abuse investigation is under way
 - The potential risk to other learners
 - The possibility of the member of staff seeking to interfere with the investigation
8. The suspension or moving of the member of staff does not indicate an assumption of guilt. The purpose is to facilitate an effective investigation. If the worker is subsequently cleared, there can then be no allegation of a 'cover up'. If a staff member requests to be suspended during the investigation, this should be considered.
 9. At this point the 'responsible senior manager' will need to inform the named member of staff that an allegation has been made against him/her and that this matter has been referred to Children's Services to be formally investigated, and that Children's Services (and possibly the police) will be interviewing the member of staff in the near future.

10. To avoid prejudicing the investigation, the details of the allegation should not be discussed prior to the Children's Services interview and the member of staff should be instructed not to discuss this with other colleagues.
11. There should be no contact between the alleged perpetrator and the learner making the allegation and, if appropriate, no contact with any learner linked to SBA Nationwide Ltd.
12. A named manager from SBA Nationwide Ltd, who is not involved in the line management of the member of staff and who will not be involved in the investigation, should be appointed to offer general support over the period of the investigation.
13. This information should always be given to the member of staff in writing, in addition to any verbal communication. In the event of a suspension from work, these discussions and the written communication, must also comply with the procedure for suspension set out in the disciplinary Policy and Procedures, and HR advice must be sought.
14. The 'responsible senior manager will, in consultation with the member of staff's line manager, decide what should be said to:
 - The learner making the allegation
 - The other staff in SBA Nationwide Ltd and any other learners linked to SBA Nationwide Ltd
15. Any details of the allegation should only be provided on a strict 'need to know' basis.
16. Once the Children's Services investigation has been completed, the 'responsible senior manager' should decide whether any further action is needed in relation to the information arising from the investigation. Depending on the outcome or the investigation, it may or may not be appropriate at this point to institute SBA Nationwide Ltd's disciplinary procedures. This decision should be conveyed to the member of staff within seven days of the completion of the investigation.
17. Any contact from the media concerning any allegation of abuse should immediately be redirected to the Head of Quality Development and Assurance.

APPENDICES

Appendix A: Disclosure and Reporting Process	Page 28
Appendix B: Type of Abuse and Possible Signs of Abuse	Page 34
Appendix C: Useful External Contacts	Page 44

Appendix A

Disclosure and Reporting Process

Someone has confided in you...

If someone informs you directly that they are concerned about an individual's behaviour towards them; this is known as a disclosure.

The person receiving the disclosure should:

- React calmly so as not to frighten the learner
- Tell the learner that he or she is not to blame and that he or she was right to tell
- Take what the learner says seriously
- If the learner is in immediate risk of significant harm, telephone for an ambulance and police, inform them of concerns and ensure that they are aware that this is a safeguarding issue
- Ensure the immediate safety of the learner
- Avoid leading the learner and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said, seen or heard
- Re-assure the learner but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments. You must tell the learner you will have to inform the local SBA Nationwide Ltd DSO
- Contact your local SBA Nationwide Ltd DSO
- If there is a Safeguarding, welfare or Prevent concern, refer all concerns/allegations/disclosures that may or do constitute a criminal offence to the police
- If applicable, parents/carers will need to be informed as soon as possible but this must be from an appropriate source (Children's Social Care/police)
- DSO will advise on the most appropriate next steps
- DSO will report to the SPOC before any decisions are taken regarding referring to the police, Social Services or any other external agency
- Inform the learner's line manager (employer)

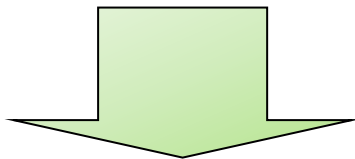
If you receive a disclosure, or need to record a concern, remember to always include the following:

- Names of all involved, date, time, and venue/location – record the conversation/observations as accurately as possible using the Learner Incident Report Form

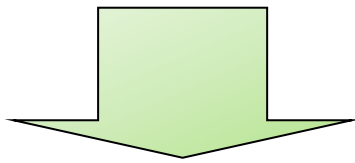
- Staff member of SBA Nationwide Ltd to scan and email ensuring that this the document is password protected completed handwritten Learner Incident Report to DSO. DSO to update with action taken then scan and email to SPOC on the same day as the incident/concern
- SPOC to record summary of incident/concern
- It is not your responsibility to investigate what has happened or to establish whether or not abuse has taken place
- All Disclosures should be noted in confidence and Guidance on record keeping is set out in Retention of Records and Documents Policy, which can be found by clicking
 - [SBA Nationwide Ltd Privacy Notice](#)

Reporting Process:

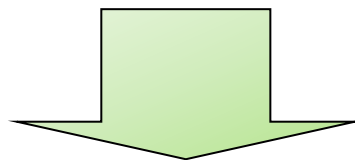
Safeguarding/Well-being or Prevent query/incident received



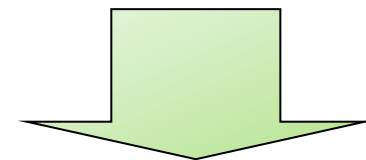
Recipient completes a Safeguarding Incident Form and email securely to the appropriate Designated Safeguarding Officer (DSO) cc'ing in Garry Brown (SPOC).
If related to Prevent, or considered urgent, to be immediately followed up with a phone call to the DSO to confirm receipt of form and action required. If DSO cannot be contacted, escalate to SPOC or Quality Team



DSO to establish what action is required according to the Safeguarding processes and completes their section of the Safeguarding Form



DSO sends completed form to the SPOC within 24 hours regardless of the outcome



SPOC logs the incident, arranges follow up if required and updates the Safeguarding, Prevent and Welfare Log on SharePoint

**If Required: Safeguarding & Prevent Hotline for any concerns or issues is open 9am – 5.30pm
Monday to Friday: call [07740 531231](tel:07740531231) or email [0333 014 4402](mailto:03330144402) or
Safeguarding@sbanationwide.com**

Details of the disclosure/allegations/suspicious

Are you recording:

- A disclosure that concerns a child (U18)?
- A disclosure that concerns a Vulnerable Adult?
- A disclosure made to you directly?
- A disclosure or suspicions from a third party?
- Your own suspicion/concern?

<input type="checkbox"/>	Individual's	<input type="text"/>
<input type="checkbox"/>	name:	
<input type="checkbox"/>		
<input type="checkbox"/>	Third Party Name:	<input type="text"/>

Date..... Time

D.O.B/age (if known)

Address (if known)

Post Code / location of learner

Details of the disclosure/allegations/suspicious. *State exactly what you were told or observed and what was said. Use the persons own words as much as possible. If you are stating your opinion, please start with: In my opinion....*

Print name of all persons referred to in this report	Initials Use initials in report	Role i.e. external individual(s); SBA Nationwide Ltd Staff, etc.
Example Jon Brown		Example Member of the public

What action did you take?

(please say who you have shared this information with, e.g. a line manager, social services, partner agency)

To be completed by DSO	
Name of DSO/SPOC:	Date completed:
Outline any your involvement, and discussion and follow up action taken:	
Review required? Y/N	When?
Review of concern (if appropriate):	
Name of person reviewing concern:	Date reviewed:
Outline result of review and any further action required:	

Appendix B

Types of Abuse and Possible Signs of Abuse/Other

A Child or Young Person - The legislation specifically refers to any person who is under the age of 18 years.

Abuse is 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. They may be abused by an adult or adults or another child or children.

Part one of KCSIE 2018 defines the following types of abuse, SBA Nationwide Ltd staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

Vulnerable Adults aged 18 or over

A vulnerable adult is defined by the Safeguarding Vulnerable Groups Act 2006 as a person who is aged 18 years or over:

- Who is or may be in need of community care services by reason of mental or other disability, age or illness
- Who is or may be unable to take care of him or herself or unable to protect him or herself against significant harm or serious exploitation

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.

It is important to note that abuse can:

- Consist of a single act or repeated acts
- Be intentional or unintentional or result from a lack of knowledge
- Be an act of neglect, an omission or a failure to act
- Cause harm temporarily or over a period of time
- Occur in any relationship
- Be perpetrated by anyone, individually or as part of a group or organisation

- Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on company computers or equipment

Neglect

Neglect is 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 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)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs
Neglect and acts of omission

Includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Possible signs of neglect include:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance
- Low self-esteem
- Poor social relationships
- Untreated medical problems
- Compulsive stealing or scrounging

Physical abuse

Physical abuse 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.

Includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

Possible signs of physical abuse include:

- Unexplained injuries or burns – particularly if they are recurrent
- Refusal to discuss injuries
- Improbable explanations for injuries
- Aggression/bullying
- Fear of medical help
- Over compliant behaviour or a 'watchful' attitude
- Untreated injuries or lingering illness not attended to
- Admission of punishment which appears excessive
- Shrinking from physical contact
- Fear from returning home or of parents being contacted

Emotional abuse:

Emotional abuse is 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 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.

Possible signs of emotional abuse include:

- Continual self-deprecation
- Fear of new situations
- Inappropriate emotional response to painful situations
- Compulsive stealing/scrounging
- Drug/solvent abuse
- Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on

- Air of detachment – ‘don’t care’ attitude
- Social isolation – does not join in and has new friends
- Desperate attention-seeking behaviour
- Eating problems, including overeating
- Lack of appetite

Sexual Abuse

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.. The sexual abuse of children by other children is a specific safeguarding issue in education.

Possible signs of sexual abuse include:

- Bruises, scratches, burns or bite marks on the body
- Scratches, abrasions or persistent
- Infections in the anal or genital regions
- Sexual awareness inappropriate to the person's age, shown for example in a drawings, games and vocabulary games and so on
- Frequent public masturbation
- Attempts to teach others about sexual activity
- Refusing to stay with certain people or to go to places or with aggressive, anger, anxiety or tearfulness, withdrawal from friends
- Promiscuity, prostitution, provocative sexual behaviour
- Self-injury, self-destructive behaviour, suicide attempts
- Pregnancy – particularly in the case of young adolescents who are evasive
- Tiredness, lethargy, listlessness
- Genital discharge/irritation
- Sleep disturbance

Financial abuse

The misappropriation of an individual’s funds, and/or any other actions that are against their best interests. For example:

- Theft of money, possessions, property or other material goods
- Misuse of money
- Fraud or extortion of material assets

Discriminatory abuse

This includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment. Hate crime can be viewed as a form of discriminatory abuse, although will often involve other types of abuse as well. It also includes not responding to dietary needs and not providing appropriate spiritual support. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse. Click on [Safe from Harm](#).

Child Sexual Exploitation

The nature of child sexual exploitation is that it is a course of conduct rather than an isolated incident leading to a series of serious sexual and other offences.

It is best described as a process of involving children in sexual activities through means such as deceit, manipulation, coercion, use of violence and threats of force with cumulative effect on children, families, social systems and the community as a whole. The sexual exploitation of children and young people is a form of child abuse and must be reported.

The National Working Group (NWG) for Sexually Exploited Children and Young People define child sexual exploitation as follows: (<http://www.nwgnetwork.org>) "Child sexual exploitation is a form of child 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 through the use of technology."

What to do if you are concerned that a young person is being sexually exploited.

Given that child sexual exploitation is a form of child abuse, any staff member with concerns that a young person is being exploited should follow the Safeguarding reporting procedures.

Grooming

Grooming is a phased, gradual process used by perpetrators to sexually exploit children and young people. It can take place over varying periods of time - from a few days to several years. It can also take different forms, and be more or less violent. Although it is talked about as having stages, this doesn't necessarily mean that it will always develop in the same way. Typically, grooming involves a number of stages:

1. Initial contact
2. Befriending; this can include non-coercive behaviour such as buying gifts, and coercive behaviour such as threats, intimidation and the use of violence
3. Exchange of favours
4. Control
5. Exploitation

The process of grooming affects children and young people in different ways. It is not easy to recognise the signs because many could be regarded as 'normal' teenage behaviour.

The following list of warning signs is not exhaustive but if you spot them it could indicate that a young person is at risk of sexual exploitation.

- Low level indicators include: overtly sexualised dress; going missing unaccounted-for monies or goods; associated with unknown adults; experimenting with drugs and alcohol; reduced contact with family & friends; poor self-image
- Medium level indicators include: getting into cars with unknown adults; disclosure of sexual assault which is then withdrawn; having a much older boyfriend/girlfriend; staying out overnight without reasonable explanation; self-harming
- High level indicators include: serious self-harming; being taken to clubs and hotels by adults; chronic alcohol or drug use; removed from a known 'red light' district; abduction; disclosure of serious sexual assault which is then withdrawn

Radicalisation

Radicalisation is the process by which individuals come to support terrorism or violent extremism. Young people may express extremist ideas, be in possession of extremist literature or express extremist views. They may associate with known extremists or seek to recruit others to an extremist ideology. Concerns that a learner's behaviour indicates involvement with extremist ideas should be considered a safeguarding issue and reported as such.

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology

The individual may change their appearance, their health may suffer (including mental health) they may become isolated from family, friends, peers or social group

There are a number of possible factors that make individuals more likely to be vulnerable to exploitation by extremist, sexual exploitation or other forms of exploitation. Factors that may contribute to vulnerability include:

- Being rejected by peer(s), faith or a social group/family
- Pressure from persons linked to extremism
- Victim or witness to race or religious hate crime
- Conflict with family over religious beliefs/lifestyle/politics
- Identity confusion
- Recent religious conversion
- Under-achievement
- May possess literature related to extreme views
- Experience poverty, disadvantage or social exclusion
- Extremist influences
- A series of traumatic events - global, national or personal

Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between two or more children/adult of any age or sex. They can occur through a group of children/adults sexually assaulting or sexually harassing a single child/adults or group of children/adults.

Anyone who is the victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. SBA Nationwide Ltd will respond to allegations seriously and all victims will be offered appropriate support.

SBA Nationwide Ltd is aware of the importance of:

(a) making it clear to learners that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

(b) not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

(c) challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

References to sexual violence are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

References to sexual harassment mean "unwanted conduct of a sexual nature" that can occur online and offline.

In the context of child on child sexual harassment, it is likely to: violate a child's dignity; and / or make them feel intimidated, degraded or humiliated; and / or create a hostile, offensive or sexualised environment.

Peer on Peer Abuse

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. SBA Nationwide Ltd recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal)

Allegations against learners should be reported as per Appendix A (Disclosure and Reporting) If harmful sexual behaviour is alleged to have occurred, the DSO/SPOC will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

All those involved in such allegations will be treated as being at risk and in need to support and the safeguarding procedures in accordance with this Policy will be followed.

Children/Young Person missing education

Learners going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. It is important that staff carefully monitored and liaise with learners' line manager to identify any trends of attendance that perhaps could lead to a concern about their welfare. Staff should speak to the DSO/SPOC if they have any concerns.

Honour Based Violence

All forms of so-called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSO/SPOC if they have any doubts.

County Lines, Cross Borders, Gangs, Trafficking and Cuckooing

These are police terms for urban gangs supplying drugs to suburban areas and market/or coastal towns using dedicated mobile or 'deal lines'. Gangs use children and vulnerable people to move drugs and money. Often they take over the homes of vulnerable adults and children by force or coercion in a practice referred to as cuckooing. Getting involved in gang culture can have serious and potentially devastating consequences, with dealers/offenders/members not afraid to use violence. There are people themselves vulnerable and at risk of exploitation by gang members from outside the county. Any activity that seems to be suspicious, or involve drug dealing/crime/exploitation should be passed to the police on 101. Should young people thought to be involved the early help assessment is a useful tool. A request for involvement to CSC/police is needed if the child is at immediate risk of harm.

Female Genital Mutilation (FGM)

Although most cases of FGM are thought to take place between the ages of 5 and 8 years, it should be recognised that FGM can occur at any time, for example on reaching adulthood or before marriage.

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.

There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM (pages 59-61 focus on the role of how to report this). All reports of FGM should be reported directly to local authorities. All reports of FGM should be reported directly to DSO who may in turn speak to the local authorities via fmufco.gov.uk for advice and information.

Forced marriage

Forced marriage is a marriage in which one or both partners do not consent to the marriage and are coerced into it. Coercion can be physical, emotional or financial. It also applies to vulnerable adults who may not have the capacity to consent to the marriage. People who are forced to marry or fear they might be forced to marry can go missing from education.

In addition to definitions provided above, in the context of vulnerable adults the following outlines the main forms of abuse:

Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

Cyber bullying

Cyber bullying is when one person or a group of people try to threaten, tease or embarrass someone else by using a mobile phone or the internet. Cyber bullying is just as harmful as bullying in the real world. Click on [No Bullying](#) and [NSPCC Bullying](#).

Cyber bullying can be perpetrated through the use of modern communication technologies (e.g. internet, text or video messaging, email, chatrooms, social media

networking sites) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them.

Significant harm

Significant harm is the threshold that provides for intervention by other agencies.

Appendix C

Guidance and Advice Sources

This Policy has regard to the following guidance and advice:

- Keeping children safe in education (2018) (KCSIE);
- Working Together to Safeguard Children (2018);
- Disqualification under the Childcare Act 2006 (2018);
- Prevent Duty Guidance for England and Wales (2015);
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015);
- Multi-agency statutory guidance on FGM (2016);
- What to do if you're worried a child is being abused: advice for practitioners (2015);
- Information sharing: advice for practitioners providing safeguarding services (2018);
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), 2016);
- Care Act 2014
- Children missing education (2016);
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (2017)
- Sexual violence and sexual harassment between children in schools and colleges (2018)

2. The most important relevant guidance arising from the legislation is:

- Working Together to Safeguard Children (HM Government 2018)
- What to do if you're worried a child is being abused (HM Government 2015)

3. An additional important convention is:

The United Nations Convention on the Rights of the Child

4. In relation to safe recruitment of staff the following report is important:

Choosing with Care (HM Government 1992)

5. In relation to Fraser guidelines relating to contraception etc., NSPCC have further information which can be found by following the link to NSPCC

Common Inspection Framework – 2016

Safeguarding continues to be an integral part of the 'Common Inspection Framework'. The role of management in Safeguarding all learners is clearly articulated. To make this judgement, inspectors will evaluate the extent to which:

- Safeguarding arrangements are in place and regularly reviewed to keep all learners aged 14 – 18 safe
- There is a clear approach to implementing the Prevent duty and keeping children and learners safe from the dangers of radicalisation and extremism
- Staff, leaders and managers understand the risks posed by adults or young people who use the internet to bully, groom or abuse children, young people and vulnerable adults; there are well-developed strategies in place to keep learners safe and to support them in learning how to keep themselves safe
- Staff, leaders and managers oversee the safe use of electronic and social media by staff and learners and take action immediately if they are concerned about bullying or risky behaviours
- Appropriate arrangements are made with regards to health and safety to protect staff and learners from harm
- Staff, leaders, governors and supervisory bodies (where appropriate) and volunteers receive appropriate training on safeguarding, which is updated regularly
- Leaders, governors and supervisory bodies (where appropriate) fulfil legislative requirements, such as those for disability, Safeguarding, and health and safety
- Appropriate arrangements are in place for health and safety and protect staff and learners from harm to those in need, or at risk of significant harm, and appropriate action is taken

Counter Terrorism Act 2015 <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill> (Working in line with Channel Awareness_ Government Prevent Strategy