

# Safeguarding, Child Protection & Vulnerable Adults Policy 2020-2021

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2.4	22/04/2021	Rachael Wrapson	Mark Pike

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This Policy is intended to cover all Board Members, Employees, Volunteers, Learners, Partner organisations and Employers.

## 1. Objectives

- 1.1. To ensure that all children, young people and vulnerable adults who are involved in activities, training, events and placements organised by Develop are effectively safeguarded.
- 1.2. To ensure that all Develop employees and volunteers are aware of and are undertaking full and correct safeguarding procedures, inclusive of the identification, recording and reporting of suspected cases of abuse, extremism and radicalisation.
- 1.3. To ensure that Develop remains up to date with legislation and practice relating to safeguarding.
- 1.4. To raise awareness and actively promote the principles of safeguarding and well-being throughout Develop activities.
- 1.5. To work in partnership with children, young people, vulnerable adults, their parents, carers and other agencies & key stake holders. This is to ensure effective implementation of this Policy.

## 2. Scope

- 2.1. To cover all activities carried out by Develop.
- 2.2. To cover all activities carried out by learners, volunteers, employees and employers; and is extended to all Board Members.
- 2.3. Develop partners and settings need to provide their own Child Protection / Safeguarding Policies, which includes preventing extremism and radicalisation.

## 3. Key Principles

- 3.1. For the purpose of this document, 'individual' or 'individuals' refers to all individuals working with, or in contact with, children, young people or vulnerable adults at any time as part of their employment. This includes staff, volunteers, employers, consultants and learners. All employers who have learners on learning programmes with Develop are required to comply with the safeguarding policy.
- 3.2. Develop is firmly committed to safeguarding in all relevant aspects of its employment and business. Develop is committed to both the legal implications of safeguarding policy and the promotion of health and in relation to all relevant customers.
- 3.3. Develop will ensure that all individuals in direct contact with children, young people or vulnerable adults as part of their employment, be they directly employed by Develop or working with Develop in any other capacity, will have enhanced Disclosure and Barring

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Service (DBS) clearance.

- 3.4. External Speakers and Visitors to Develop without DBS clearance will be supervised in the company of all learners at all times.
- 3.5. Referral and reporting procedures will be in place and strictly adhered to in the event of any concerns relating to the abuse of children, young people and vulnerable adults.
- 3.6. Develop staff will maintain up-to-date knowledge of safeguarding practice and procedures, extended to include the Prevent agenda.
- 3.7. Develop recognises that the welfare of children, young people and vulnerable adults is paramount and will prioritise their safeguarding accordingly.
- 3.8. Develop will actively seek to work with all related agencies, companies, bodies and providers in order to promote and maintain the highest standards of safeguarding.
- 3.9. Develop will comply with all applicable regulations set out in;
  - The Protection of Children’s Act 1999.
  - The Safeguarding Vulnerable Groups Act 2006.
  - The Children’s Act 2004.
  - The Education Act 2002.
  - The Sexual Offences Act 2003.
  - The Protection of Freedoms Act 2012.
  - Keeping Children Safe in Education.
  - The Counter-Terrorism & Security Act 2015.
  - The Modern Slavery Act 2015
  - Government Guidance – Sexual violence and sexual harassment between children in schools and colleges.

#### 4. Designated Persons

- Rachael Wrapson – Safeguarding and Well-being Manager  
[wrapsonr@developebp.co.uk](mailto:wrapsonr@developebp.co.uk)  
 Tel: 01525 408690 / 07712395302
- Mark Pike - Chief Executive Officer, Deputy Designated Safeguarding Lead and Regulated Activity Provider (RAP)  
[pikem@developebp.co.uk](mailto:pikem@developebp.co.uk)  
 Tel: 01525 408080

#### 5. Roles & Responsibilities

- 5.1. The Safeguarding and Well-being Manager has a key duty for raising awareness across all staff of issues relating to the welfare of children, young people and adults at risk.

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- 5.2. The post holder is required to have training in safeguarding issues and inter-agency working, receiving refresher training at least every two years or as and when any new issues arise. The Safeguarding and Well-being Manager is responsible for:
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
  - Providing advice and support to other staff on issues relating to safeguarding.
  - Maintaining a detailed and accurate record of any child protection referral, complaint or concern (even where that concern does not lead to a referral).
  - Liaising with the Local Authorities and other appropriate agencies.
  - Supporting Heads of Centre and liaising with educational establishments and secondary schools that send pupils to Develop, to ensure that appropriate arrangements are made for learners.
  - Liaising with employers and training organisations that receive children or young people from Develop on block placement work experience or long term placements to ensure that appropriate safeguarding policies are put into place.
  - Ensuring that staff will receive training in safeguarding issues appropriate to their roles and are aware of Develop safeguarding procedures.
  - Advising the CEO on efficiency and adequacy of resources and training being available to implement this policy.
  - Ensuring arrangements are made to bring this policy to the notice of all employees, volunteers, employers, sub-contractors and visitors.
  - The policy and its arrangements are regularly reviewed during Develop Safeguarding Quality Improvement Groups.
- 5.3. Within Develop other designated staff that hold a responsibility for safeguarding and are based at centres. Names of Develop employees are within Appendix A. These designated staff:
- Report to the Safeguarding and Well-being Manager, who has lead responsibility.
  - Know how to make an appropriate referral.
  - Are available to provide advice and support to staff on issues relating to safeguarding.
  - Are available to listen and respond appropriately to children, young people, Looked After Children (LAC) and adults at risk studying within Develop.
  - Deal with individual cases, including attending case conferences and review meetings as appropriate.
- 5.4. The designated Chair of Board, Barry George, is responsible for liaising with the CEO and the Safeguarding and Well-being Manager over matters regarding safeguarding, including:
- Ensuring Develop has procedures and policies in place which are consistent with guidelines.

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- Ensuring the Board considers the organisation's policy on safeguarding each year.
- Ensuring that each year the Board is informed of how Develop and its staff have complied with the policy, including, but not limited to a report on the training that staff have undertaken.

The designated Chair of Board is responsible for overseeing the liaison between agencies, e.g. Police, Social Services in connection with allegations against the CEO. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

5.5. CEO has overall responsibility for all matters relating to Safeguarding and will refer any cases of suspected abuse or allegation, to relevant investigating agencies as agreed with the Local Safeguarding Board.

The CEO will:

- Ensure that all employees have knowledge and understanding of safeguarding and that it is taken seriously.
- Ensure that appropriate child protection and safeguarding policies are adopted, implemented and monitored.
- Ensure that, where services or activities are provided by sub-contractors or another body, the body concerned has appropriate safeguarding policies and procedures.
- Foster a culture of openness and support.
- Ensure that all employees feel able to raise concerns about poor or unsafe practice and such concerns are handled sensitively and in accordance with the whistle blowing procedure.
- Acknowledge and discuss any concerns about any members of staff.
- Ensure that the development and the use of our new and existing media technologies do not expose learners to any potential harm during their educational hours with Develop.
- Work with the IT Coordinator to ensure safeguarding when using digital media and the internet in the education of our learners.
- Ensure that Develop has access to the external and internal resources to offer extensive support around Child Protection and Safeguarding.
- Monitor the processes for promoting learner welfare and safeguarding to ensure that adequate resources are given to it, including staff training.
- Work with the Safeguarding and Well-being Manager to ensure procedures are in place to ensure that learners requiring safeguarding measures are monitored in relation to their situation and progress with their learning.
- Report to the Board at each Board meeting.
- Ensure that all recruitment procedures follow Safer Recruitment Guidance.
- Ensure that learners' safety and welfare is addressed through the curriculum.

CEO is responsible for referring cases of suspected abuse or allegations to the Local Authority Designated Officer (LADO) (see Allegations of Abuse Against Staff Policy). CEO is responsible for dealing with allegations made against members of staff.

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## 6. Child Welfare

- 6.1 Develop recognises the need to prioritise the welfare of children, young people and vulnerable adults with which it works. These are defined as follows:
- A child is anyone who is 18 years or younger.
  - A young person is anyone who is 19 but has not reached their 20<sup>th</sup> Birthday.
  - A vulnerable adult is someone who is aged 18 years or over; who is, or may be, in need of community care services by reason of mental health, or other disability, age or illness. They may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. Individuals will operate in line with this safeguarding policy at all times.
- 6.2 Develop considers abuse of any kind, neglect, maltreatment, aggressiveness, intimidation and bullying, all as damaging to the welfare of a child, young person or vulnerable adult.
- 6.3 Complaints or concerns relating to individuals working with Develop will be reported to the CEO immediately. Develop's Whistleblowing Policy or Data Protection Policy do not prevent information sharing with investigating agencies where the information will help to safeguard welfare. Develop will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to Social Care Services/Police or the appropriate agencies as agreed with the relevant Local Safeguarding Board.
- 6.4 Individuals will be offered training that will help to make them aware of possible signs of abuse/exploitation and act appropriately.
- 6.5 Children, young people and vulnerable adults will be respected at all times and encouraged to interact in both formal (evaluation and feedback) and informal (spoken word) communication.
- 6.6 Individuals will maintain appropriate relationships with children, young people and vulnerable adults, reducing physical contact and one-on-one situations to the minimum practicable level.
- 6.7 Individuals will endeavour to avoid being alone with a child, young person or vulnerable adult whenever possible, and will not offer informal travel or other similar services. The Safeguarding and Well-being Manager, when receiving safeguarding disclosures, will work in accordance with the Lone Working Policy.
- 6.8 Develop recognises the right of children, young people, vulnerable adults and/or their parents/guardians, to withdraw from featuring in promotional material, either on video or in photographs. Opt out forms will be prioritised and strictly adhered to in relevant situations.
- 6.9 Peer on Peer abuse: Develop's procedures for minimising the risk of Peer on Peer abuse, ensure learners are issued with:
- Learner code of conduct
  - Learner handbook, contain the contact details for the Safeguarding and Well-being Manager and Centre Designated Safeguarding Leads and Deputy

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### Safeguarding Leads

- Anti-bullying Policy
- Safeguarding, Child Protection and Vulnerable Adults Policy

All learners receive a face-to-face safeguarding induction with the Safeguarding and Well-being Manager when they enrol at Develop, which addresses Peer on Peer abuse.

## 7. Children who may be particularly vulnerable

a. Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. LAC are particularly vulnerable - the most common reason for children becoming looked after is as a result of abuse and/or neglect. Develop will ensure that employees have the skills, knowledge and understanding necessary to keeping LAC safe. In particular, they will ensure that appropriate employees have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

b. To ensure that all children, young person or vulnerable adult working alongside Develop receive appropriate protection, we will give special consideration to those who are:

- Disabled or have Special Education Needs
- Living in a domestically abusive situation
- Affected by parental substance misuse
- Asylum seekers
- Regularly absent from school
- Attending alternative provision or subject to a managed move
- Living away from home (frequent movers)
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Living a transient lifestyle
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- Involved directly or indirectly in prostitution or child trafficking
- Speakers or another first language
- Children that are subject to a Full Care order (LAC), Child Protection Plan or Children in Need Plan
- Children that may be vulnerable to messages of violence and extreme ideologies and radicalisation

### Peer on Peer abuse

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Allegations of Peer on Peer abuse, within Develop, will be investigated. This will include meetings between the Safeguarding and Well-being Manager, the Head of Centre, the Learner and their Parent(s)/Carer(s) and any relevant external agencies. This is in line with Develop's Support Policy, including the disciplinary process.

The victim, perpetrator and any other learner affected by Peer on Peer abuse will be supported in accordance to the Support Policy. Both victims and perpetrators will be dealt with on a case by case basis, taking into account circumstances and individual needs.

## 8. Definitions and categories of abuse

Develop recognises the following as definitions of abuse; physical, emotional, neglect, and sexual with the additional categories of acts of omission, psychological, financial or material, institutional or professional abuse.

Someone may abuse or neglect a child or young person by inflicting harm, by failing to act to prevent harm, or by failing to ensure safety and adequate care. Harm may occur intentionally or unintentionally. Children may be abused in a family, an institution or community setting, by those known to them, or by a stranger. Examples of abuse are set out below these examples are by no means exhaustive;

### a. 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. Possible signs of physical abuse include:

- Any injuries not consistent with the explanation given for them.
- Injuries which occur to the body in places which are not normally exposed to falls or rough games.
- Injuries which have not received medical attention.
- Reluctance to change for, or participate in, games or swimming.
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation.
- The child gives inconsistent accounts for the cause of injuries.

### b. 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

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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:

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy.
- Obsessions or phobias.
- Sudden underachievement or lack of concentration.
- Seeking adult attention and not mixing well with other children.
- Sleep or speech disorders.
- Negative statements about self.
- Highly aggressive or cruel to others.
- Extreme shyness or passivity.
- Running away, stealing and lying.

c. **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 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. Possible signs of neglect include:

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice.
- Clothing that is dirty, too big or small, or inappropriate for weather conditions.
- Frequently left unsupervised or alone.
- Frequent diarrhoea.
- Frequent tiredness.
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to.
- Frequently hungry.
- Overeating junk food.

d. **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

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inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Possible signs of sexual abuse include:

- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age.
- Sexual activity through words, play or drawing.
- Repeated urinary infections or unexplained stomach pains.
- The child is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations.
- Eating disorders such as anorexia or bulimia.

## 8.5 Domestic Abuse/Violence

The cross-government definition of abuse is: “Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse

- Psychological
- Physical
- Sexual
- Financial
- emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.” \*

This definition, which is not a legal definition, includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.” (GOV.UK)

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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 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.

## 8.6 Bullying and Cyberbullying

Cyberbullying is bullying that takes place over digital devices, such as mobile phones and internet use through computers, laptops and tablets. Cyberbullying can occur through SMS, Text and Apps or online with social media, forums or gaming, where people can view, participate in, or share content. Cyberbullying includes sending, posting or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information or images about someone else causing embarrassment and humiliation. Some Cyberbullying crosses the line into unlawful or criminal behaviour. See Develop’s Anti-Bullying Policy for further information.

- The most common places where Cyberbullying takes place:
- Social Media, such as Facebook, Instagram, Snapchat and Twitter
- SMS (short Message Service) also known as a ‘text message’ sent through devices.
- Instant Messaging (via devices, email provider services, Apps and social media messaging features)
- Email

## 8.7 **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 (on occasions weapons) from urban areas to suburban and rural areas, market and seaside towns. The key to identifying potential involvement in county lines are missing episodes, where the victim may have been trafficked for the purpose of transporting drugs.

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 and females, and young people or adults; and

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- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, the power of 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.

## 8.8 Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex.

CSE 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 (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship, where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex and sexual bullying. CSE does not always involve physical contact; it can also occur through the use of technology; cyber bullying and grooming.

However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. The victim may have been sexually exploited even if the sexual activity appears consensual.

## 8.9 Peer on Peer Abuse

Peer on Peer abuse is considered to be a specific safeguarding issue. When considering if a behaviour between a child or young person to another child or young person has been abusive it is important to consider; whether there is a large difference in power (for example age, size, ability, development between the young people concerned); or whether the perpetrator has repeatedly tried to harm one or more other children; or whether there are concerns about the intention of the alleged perpetrator. Peer on Peer abuse can manifest itself in many different ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual, or emotional (blackmail/threats) and can include gender based violence/sexual assaults, sexting, teenage relationship abuse, peer on peer exploitation, serious youth violence, sexual bullying, harmful sexual behaviour, cyber bullying, initiations, and showing prejudice in race, religion or disability.

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All Peer on Peer abuse is unacceptable and will be taken seriously, regardless of the gendered nature of abuse.

Peer on Peer abuse is categorised under ‘abuse’ and should never be tolerated or passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse.

Upskirting is an example of Peer on Peer abuse and is a criminal offence. Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals, or buttocks or to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Under the Voyeurism Act, the offence of upskirting can be punishable by imprisonment.

### 8.10 Teenage Relationship Abuse

This is a pattern of abusive behaviours over a course of time used to exert power and control over a dating partner. Violent words and actions are tools an abusive partner uses to gain and maintain power and control over their partner. Types of abuse include: emotional, verbal, physical, financial, sexual, stalking and digital (using technology to threaten, stalk, intimidate or bully).

### 8.11 Sexual Violence and Sexual Harassment between children in schools and colleges

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone

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consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information on consent:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16
- sexual intercourse without consent is rape.

Sexual Harassment: When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment 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.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (Develop will consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include;
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

It is important that staff consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

All learners and staff in Centres have been provided with information on how to report, within Develop, any concerns relating to sexual violence and sexual harassment within education. They have also been provided with the following external support information

NSPCC helpline for people who have experienced sexual harassment or abuse in education 0800 136 663

Everyone’s Invited is a website, which invites anyone affected by sexual harassment, abuse or assault to share his or her experience anonymously. Many of the testimonials submitted relate to experiences of children and young people at schools, college or university. You may receive enquiries from learners, parents and carers’ media and

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also requests for support. You can view the website and testimonials at:  
<https://www.everyonesinvited.uk/about>

Requests for support must be shared with Develop’s Safeguarding and Wellbeing Manager in accordance with Develop’s safeguarding procedures and should be done so using CPOMS.

Staff and Learners may also access the Childrens Services Consultation Hub for Child Protection – advice line on 0300 123 4043.

Below are a list of links, which will enable staff and learners to report or request support from the following Local Authorities.

Milton Keynes

<http://www.solacesarc.org.uk/>

Bedfordshire

<https://www.bedfordshire.police.uk/information-and-services/Crime/Rape-and-sexual-offences/Can-I-report-to-a-third-party#fc005036>

Hertfordshire

<https://www.herts.police.uk/Information-and-services/Victim-services/Operation-Meadow/Sexual-abuse-or-violence>

Norfolk

<https://www.norfolk.gov.uk/safety/domestic-abuse/how-to-get-help/help-following-sexual-abuse>

## 8.12 Serious Violence

Serious Violent offences are offences such as homicides and offences involving guns and knives. All staff should be aware of indicators, which may signal that learners are at risk from, or are involved with serious violent crime. These may include increased absence from Centre, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that learners 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.

Early intervention is about recognising and responding to the indicators of potential vulnerability, providing early support that is effective.

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When a learner begins to show the signs of exploitation or vulnerability to exploitation, and therefore are at increased risk from Serious Violence, we should be able to intervene as early as possible to help reduce the risk factors and increase the protective factors.

Within Develop timely reporting on CPOMS is crucial in helping achieve the early intervention a learner may need in this situation.

### 8.13 Honour Based Abuse

So-called ‘honour based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including forced marriage, Female Genital Mutilation (FGM) and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and must be reported immediately.

### 8.14 Forced Marriage

Forced Marriage is considered to be a form of Honour Based Abuse. A forced marriage is a marriage without the full consent of both parties and where pressure or threats are a factor. This is very different to an arranged marriage, which both people will have agreed to. Emotional pressure from their family might stop them from saying anything to anyone else. The lack of control over their own decisions can lead to depression and self-harm.

Signs and indicators of concern:

- Truancy / absence from school.
- Low Motivation.
- Lack of Punctuality.
- Self-Harm.
- Depression.
- Isolation.
- Attempted Suicide.
- Eating Disorders.
- Brother/Sisters forced to marry or reported missing.
- Family disputes.
- Runaways.
- Domestic violence.
- Substance misuse.

While many of these signs and indicators could be linked to their issues, it is important to consider all potential reasons and keep an open mind. Honour Based Abuse and Forced Marriages are a fundamental abuse of human rights. As of 16th June 2014 changes to legislation made Forced Marriages a criminal offence. Remember the ‘**One Chance Rule**’.

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## If someone you know is at risk

Contact the Forced Marriage Unit (FMU) if you know someone who's been taken abroad to be forced into marriage.

Give as many details as you can, for example:

- where the person has gone
- when they were due back
- when you last heard from them

The FMU will contact the relevant embassy.

If they're a British national, the embassy will try to contact the person and help them get back to the UK if that's what they want.

### 8.15 Female Genital Mutilation:

Female genital mutilation (sometimes referred to as female circumcision or 'cutting') refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. It has been estimated that over 65,000 girls under the age of 13 are at risk of female genital mutilation (FGM) in the UK each year, and that 170,000 women and girls in the UK are living with the consequences of FGM. However, the true extent is unknown, due to the "hidden" nature of the crime. Females may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to "heal" before they return to school. There is evidence that girls have now undergone this FGM in the UK.

Risk Factors:

- A child talking about a special ceremony.
- A young person talking about being 'cut'.
- A child belonging to certain communities.
- Planning an extended trip abroad.
- Knowledge of previous siblings.

Indicators it may have taken place:

- Prolonged absence.
- Change in behaviour on returning from an extended holiday.
- Urinary infections, bladder or menstrual problems.
- Describing pain in the groin.
- Avoiding physical activity.
- Appears uncomfortable including when sitting.
- Finds it difficult to sit still.
- Talking about something happening to them or someone hurting them and having to keep a secret.

### Making a Report

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires Teachers in

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England and Wales to make a report to the police where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
  - observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the Teacher who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second. For staff that are not teachers, reports concerning FGM must be made directly to the Safeguarding and Well-being Manager who will make any necessary reports directly to the Police.

Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

### **8.16 Recognising Young People Who May Be Affected by Gang Activity**

Gang involvement is a multi-agency issue; partnership working and information sharing is therefore a key to safeguarding children, young people, vulnerable adults at risk of gang-related harm. Children, young people, vulnerable adults are put at risk by gang activity both through participation in and as victims of gang violence. Learners particularly vulnerable to suffering harm in the gang context are those who are:

- Not involved in gangs, but living in an area where gangs are active.
- Not involved in gangs, but at risk of becoming victims of gangs; by way of truanting from education, permanent exclusion from school/college or having been a victim of abuse or neglect.
- Not involved in gangs but at risk of becoming drawn in, for example, siblings or children of known gang members; or
- Gang-involved and at risk of harm through their gang-related activities (e.g. drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members).

Victims and offenders are often the same people. When adults treat a young person as just a victim or just an offender, they are not taking into account the complex, cyclical nature of the victim-offender link and the factors that influence young people's lives. There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk factors for a person becoming involved in gangs may include:

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- Becoming withdrawn from family;
- Sudden loss of interest in education – decline in attendance or academic achievement;
- Starting to use new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason;
- Sudden change in appearance - dressing in a particular style or ‘uniform’;
- Dropping out of positive activities;
- New nickname;
- Unexplained physical injuries;
- Graffiti style tags on possessions, school books, walls;
- Constantly talking about another young person who seems to have a lot of influence over them;
- Broken off with old friends and hanging around with a new group;
- Increased use of social networking sites;
- Starting to adopt codes of group behaviour e.g. ways of talking and hand signs;
- Expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past;
- Being scared when entering certain areas;
- Being concerned by the presence of unknown youths in their neighbourhood.

This is not an exhaustive list and should be used as a guide, amended as appropriate in light of local knowledge of the risk factors in a particular area.

### 8.17 Contextualised Safeguarding

Contextualised Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and Carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can determine parent-child relationships.

Link to further information: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

### 8.18 Recognising Extremism and Radicalisation

The following guidance is written with regard to the Home Office guidance “Channel: Protecting Vulnerable People from Being Drawn into Terrorism” and “Channel: Vulnerability Assessment Framework”.

**Engagement:** Example needs, susceptibilities, motivations and contextual influences that make individuals vulnerable to engagement with an extremist group, cause or ideology include:

- Feelings of grievance and injustice.

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- Feeling under threat.
- A need for identity, meaning and belonging.
- Desire for status.
- A desire for excitement and adventure.
- A need to dominate and control others.
- Susceptibility to indoctrination.
- A desire for political or moral change.
- Opportunistic involvement.
- Family or friend's involvement in extremism.
- Being at a transitional time of life.
- Being influenced or controlled by a group.
- Relevant mental health issues.
- Pre-existing conviction that their religion / culture is under threat.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists.
- Changing their style of dress or personal appearance to accord with the group.
- Their day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups).
- Attempts to recruit others to the group/cause/ideology.
- Communication with others that suggest identification with a group/cause/ideology.
- Increased Social Media use, changes in their profile/image or name and being overly secretive about it. Extremist groups/individuals use social media to recruit those vulnerable to radicalisation.

**Intent to cause harm:** Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately.

Intent factors describe the mind-set that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- Over-identification with a group or ideology.
- 'Them and Us' thinking.
- Dehumanisation of the enemy.
- Attitudes that justify offending.
- Harmful means to an end.
- Harmful objectives.

Example indicators that an individual has an intention to use violence or other illegal means include:

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- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills.
- Using insulting or derogatory names or labels for another group.
- Speaking about the imminence of harm from the other group and the importance of action now.
- Expressing attitudes that justify offending on behalf of the group, cause or ideology.
- Condoning or supporting violence or harm towards others plotting or conspiring with others.

**Capability to cause harm:** Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Example indicators that an individual is capable of directly or indirectly causing harm include:

- Having a history of violence.
- Being criminally versatile and using criminal networks to support extremist goals.
- Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction).
- Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

**Please refer to Develop’s Preventing Extremism and Radicalisation Safeguarding Policy for further details.**

## 8.19 Hate crime

What are hate incidents?

The Police and Crown Prosecution Service have agreed a common definition of hate incidents. They say something is a hate incident if the victim or anyone else thinks it was motivated by hostility or prejudice based on one of the following things:

- Disability
- Race
- Religion
- Transgender identity
- Sexual orientation.

This means that if you believe something is a hate incident it should be recorded as such by the person you are reporting it to, i.e. Head of Centre, Safeguarding Lead.

**Anyone can be the victim of a hate incident.**

Other personal characteristics:

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Those people who live by an alternative sub-culture can be subject to hate incidents. These are incidents based on someone's appearance and include Goths, Emos, Punks and other similar groups.

### What type of incidents can be a hate incident?

Hate incidents can take many forms, for example:

- Verbal abuse like name-calling and offensive jokes.
- Harassment.
- Bullying or intimidation by children, adults, neighbours or strangers.
- Physical attacks such as hitting, punching, pushing, spitting.
- Threats of violence.
- Hoax calls, abusive phone or text messages, hate mail.
- Online abuse for example on Facebook or Twitter.
- Displaying or circulating discriminatory literature or posters.
- Harm or damage to things such as your home, pet, vehicle.
- Graffiti.
- Arson.
- Throwing rubbish into a garden.
- Malicious complaints for example over parking, smells or noise.

### When is a hate incident also a hate crime?

When hate incidents become criminal offences they are known as hate crimes.

A criminal offence is something which breaks the law of the land. Any criminal offence can be a hate crime if it was carried out because of hostility or prejudice based on disability, race, religion, transgender identity or sexual orientation.

When something is classed as a hate crime, the courts can impose a tougher sentence on the offender under the Criminal Justice Act 2003.

Incidents which are based on other personal characteristics, such as age and belonging to an alternative subculture, are not considered to be hate crimes under the law. These should still be reported, but they will not be prosecuted specifically as hate crimes by the police and the Crown Prosecution Service.

### Examples of hate crimes

- Assaults
- Criminal damage
- Harassment
- Murder
- Sexual assault
- Theft
- Fraud
- Burglary
- Hate mail (Malicious Communications Act 1988)
- Causing harassment, alarm or distress (Public Order Act 1988).

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## What can you do about a hate incident or crime?

If you've experienced a hate incident or crime you must report it to the Safeguarding and Well-being Manager, who can report it to the police. You should also report a hate incident or crime even if it wasn't directed at you. For example, if another learner behaves inappropriately.

When reporting the incident or crime you should say whether you think it was because of disability, race, religion, transgender identity, sexual orientation or a combination of these things. This is important because when it gets reported to the police it gets recorded as a hate incident or crime.

It's also important to keep in mind that some hate crimes start as smaller incidents which may escalate into more serious and frequent attacks - so it's always best to act early.

If you're being repeatedly harassed, should you report all the incidents? If you've experienced hate crime, it may have been just one isolated incident. But sometimes, you may be repeatedly harassed by the same person or group of people.

### 8.20 Modern Slavery

Modern slavery is a form of organised crime in which individuals including children and young people are treated as possessions/supplies and exploited for criminal gain. Traffickers and slave drivers trick, force and/or persuade children and parents to let them leave their homes.

Grooming methods are used to gain the trust of a child and their parents, e.g. the promise of a better life or education, which results in a life of abuse, enslavement and inhumane treatment.

Child modern slavery is identified as child abuse which requires a child protection response. It is an abuse of human rights, and all children, irrespective of their immigration status, are entitled to protection under the law.

Children are recruited, moved or transported and then exploited, forced to work or sold. The Modern Slavery Act 2015 includes two substantive offences i) human trafficking, and ii) slavery, servitude and forced or compulsory labour. It also provides two civil prevention orders - the Slavery and Trafficking Prevention Orders (STPO) and Slavery and Trafficking Risk Order (STRO) and provision for child trafficking advocates.

Children are not considered able to give 'informed consent' to their own exploitation (including criminal exploitation), so it is not necessary to consider the means used for the exploitation - whether they were forced, coerced or deceived, i.e. a child's consent to being trafficked is irrelevant and it is not necessary to prove coercion or any other inducement.

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Boys and girls of all ages are affected and can be trafficked into, within ('internal trafficking'), and out of the UK for many reasons and all forms of exploitation - e.g. sex trafficking - children can be groomed and sexually abused before being taken to other towns and cities where the sexual exploitation continues. Victims are forced into sexual acts for money, food or a place to stay. Other forms of slavery involve children who are forced to work, criminally exploited and forced into domestic servitude. Victims have been found in brothels or saunas, farms, in factories, nail bars, car washes, hotels and restaurants and commonly are exploited in cannabis cultivation. Criminal exploitation can involve young people as drug carriers, begging and pick-pocketing. Debt bondage (forced to work to pay off debts that realistically they will never be able to), organ harvesting and benefit fraud are other types of modern slavery.

Victims often face more than one type of abuse and slavery, for example they may be sold to another trafficker and then forced into another form of exploitation.

Children and young people may be exploited by parents, carers or family members. Often the child or young person will not realise that family members are involved in the exploitation.

Some young people may not be victims of human trafficking but are still victims of modern slavery.

Slavery, servitude and forced or compulsory labour may also be present in trafficking cases; however, not every young person who is exploited through forced labour has been trafficked. In all cases, protection and support is available through different agencies (e.g. the police, Home Office, including Border Force, UK Visas and Immigration, local authorities and voluntary organisations).

### Risk Factors and Vulnerable Circumstances

Victims may not always be recognised by those who come into contact with them. They may be unwilling to come forward to agencies not seeing themselves as victims, or fearing further reprisals from their abusers.

Vulnerable circumstances include:

- Poverty, limited opportunities at home, low levels of education, and the effects of war are some of the key drivers that contribute to trafficking of victims;
- Poor and displaced families may hand over care of their children to traffickers who promise to provide them with a source of income, education or skills training, but ultimately exploit them;
- Wanting to help their families back at home or seeking better futures;
- Escaping familial situations of harm and abuse, homelessness or being orphaned;

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- A lack of equal opportunities, discrimination or marginalisation and social customs such as children being expected to respect and follow the adult in charge. Faith abuse and other specific practices may be used to control the child. A demand for cheap or free labour or a workforce who can be easily controlled and forced into criminal activity;
- Unaccompanied, internally displaced children;
- Some children may say they are unaccompanied when claiming asylum - the trafficker may have told the child that in doing so they will be granted permission to stay in the UK and be entitled to claim welfare benefits;
- Former victims of modern slavery or trafficking;
- Trafficked children have an increased risk of going missing from care in the UK, with some re-joining those who exploited them in the first place.

### Indicators

Signs that a child has been trafficked may not be obvious, or children may show signs of multiple forms of abuse and neglect. Spotting the potential signs of child slavery/trafficking in referrals and children you work with can include:

- A reluctance to seek help - victims may be wary of the authorities for many reasons such as not knowing who to trust or a fear of deportation or concern regarding their immigration status and may avoid giving details of accommodation or personal details;
- The child seeming like a willing participant in their exploitation, e.g. involvement in lucrative criminal activity - however this does not mean they have benefitted from the proceeds;
- Discrepancies in the information victims have provided due to traffickers forcing them to provide incorrect stories;
- An unwillingness to disclose details of their experience due to being in a situation of dependency;
- Brought or moved from another country;
- An unrelated or new child discovered at an address;
- Unsatisfactory living conditions - may be living in dirty, cramped or overcrowded accommodation;
- Missing - from care, home or school - including a pattern of registration and de-

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registration from different schools;

- Children may be found in brothels and saunas;
- Spending a lot of time doing household chores;
- May be working in catering, nail bars, caring for children and cleaning;
- Rarely leaving their home, with no freedom of movement and no time for playing;
- Orphaned or living apart from their family, often in unregulated private foster care;
- Limited English or knowledge of their local area in which they live;
- False documentation, no passport or identification documents;
- Few or no personal effects - few personal possessions and tend to wear the same clothing;
- No evidence of parental permission for the child to travel to the UK or stay with the adult;
- Little or no evidence of any pre-existing relationship with the adult or even an absence of any knowledge of the accompanying adult;
- Significantly older partner;
- Underage marriage.
- Physical Appearance - Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn. Physical illnesses - including work-related injuries through poor health and safety measures, or injuries apparently as a result of assault or controlling measures. There may be physical indications of working (e.g. overly tired in school or indications of manual labour).
- Sexual health indicators - sexually transmitted infections, or pregnancy; injuries of a sexual nature and/or gynaecological symptoms.
- Psychological indicators - suffering from post-traumatic stress disorder which may include symptoms of hostility, aggression and difficulty with recalling episodes and concentrating. Depression/self-harm and/or suicidal feelings; an attitude of self-blame, shame and extensive loss of control; drug and or/alcohol use.

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## Protection and Action to be Taken

Modern slavery is child abuse, and any potential victim should immediately be referred to the Safeguarding and Well-being Manager through CPOMS. See section 10 of this Policy for reporting procedures.

### **8.21 Further information**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. NSPCC offers information for schools on its website [www.nspcc.org.uk](http://www.nspcc.org.uk) Broad government guidance on the issues listed below can also be accessed via the [www.gov.uk](http://www.gov.uk) website:

#### Missing Children and Vulnerable Adults

- children missing education  
<https://www.gov.uk/government/publications/children-missing-education>
- children missing from home or care  
<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>
- Missing children and adults  
<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

#### Other

- Drugs
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Mental health
- Private fostering
- Radicalisation
- Sexting
- Teenage relationship abuse
- Human trafficking.

## **9. Procedure for dealing with a disclosure**

When a child, young person or vulnerable adult discloses abuse to a member of Develop the employee must report the disclosure to the Safeguarding and Well-being Manager or the Deputy Designated Safeguarding Lead at Develop immediately. All concerns must be reported within 24 hours. Failure to do so may result in disciplinary action. **See flow chart appendices.**

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All external speakers and visitors are issued with the Develop leaflet setting out guidance about their courses of action in this circumstance.

The member of staff concerned should refer to the following guidance when hearing the allegation of abuse from a child, young person or vulnerable adult.

The staff member should listen carefully:

- Notify the person that the disclosure cannot be kept a secret, and you are required to inform the relevant Designated Safeguarding Leads.
- Allow the person to speak without interruption, remember 'TED' (Tell, Explain, Describe).
- Never trivialise or exaggerate the issue.
- Never make suggestions
- Never coach or lead, in any way.
- Re-assure the person and let them know that they are glad the person has spoken up and that they were right to do so.
- Always question enough to clarify understanding, but not to probe or interrogate.
- Remain calm at all times, this is not an easy thing for them to do.
- Do not show emotions such as anger, disgust or disbelief as this may stop the person communicating further. This may be because the person may feel that they are upsetting the staff member or may feel the staff member's negative feelings are directed towards them.
- Let the person know that Develop will take their disclosure very seriously and will take the appropriate action.
- Employees and volunteers are not required by Develop to investigate suspicions where they may suspect that a child, young person or vulnerable adult may be at risk of suffering significant harm.

They must always refer such concerns to the Safeguarding and Well-being Manager or Deputy Designated Safeguarding Lead and never explore concerns or allegations themselves; the designated people will then determine the appropriate course of action.

## 10. Reporting concerns and disclosures

Immediately report concerns/disclosures to the Safeguarding and Well-being Manager, Deputy Safeguarding Lead/CEO. Inform them about any medical attention needed or other requirements needed to safeguarding children, young people, vulnerable adults or themselves for immediate protection. If the Safeguarding and Well-being Manager, Deputy Safeguarding Lead/CEO are unavailable please refer to your internal list of Local Multi Agency Arrangements, as issued to you by your Head of Centre.

Records will be kept of all such incidents. Their outcomes will be held by the Safeguarding and Well-being Manager/Deputy Safeguarding Lead in accordance with the Data Protection Act. The law provides that these outcomes may be shared with

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Children’s Services, the Police, DBS and Local Multi Agency Arrangements, upon request.

## 11. Recording Concerns

Record all disclosures by using the appropriate documentation, as advised by the Safeguarding and Well-being Manager or Deputy Designated Safeguarding Lead. This will either be the electronic reporting system or the cause for concern form.

Effective recording:

- Reports must be factual and accurate and include as much detail as possible.
- Opinions should be clearly stated e.g. “I thought this might be because...In my opinion...”
- List any witnesses who may corroborate your testimony.
- Differentiate between fact, opinion, interpretation, observation and allegation.
- Always record in the child’s words no matter how distressing e.g. “The child told me...”
- Report all concerns, as advised, using CPOMS no later than 24 hours after the disclosure.
- Allegation of Peer on Peer abuse will be recorded by all Develop staff using CPOMS, in line with our reporting procedure.

## 12. Confidentiality

- a. Develop employees and volunteers will inform the child, young person or vulnerable adult at the earliest possible stage of the disclosure that information will be shared with appropriate persons.
- b. Develop will ensure that all data about learners is handled in accordance with the requirements of the Data Protection Act 2018, and any national laws and legislations and local guidance.
- c. All Develop employees or volunteers who gain access to sensitive information about a learner or the learner’s family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know.
- d. Develop ensures that confidentiality and trust will be maintained within limits, but staff must act on the basis that the safety of the person disclosing is the overriding concern. The degree of confidentiality will be governed by the need to protect those concerned.

## 13. Learners awareness of Safeguarding

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- a. Develop will issue all learners with induction materials explaining how to report safeguarding matters. This is to make learners aware of what constitutes a safeguarding issue by keeping communal notice boards up to date with relevant information.
- b. Develop assures that all policies and procedures, including those on abuse, bullying and internet safety, are implemented.
- c. Learners that participate on programmes through Develop are made aware of methods to report concerns to ensure opportunities are not missed.

#### 14. Allegations against members of staff

- a. Any Allegations that are made about any employee of Develop (including any volunteers or Board Members) the allegation will be dealt with in accordance with national guidance and agreements, as implemented locally.
- b. The CEO, rather than the Safeguarding and Well-being Manager will handle such allegations, unless the allegation is against the CEO, where the Chair of Board will handle the response on behalf of Develop, with the investigation being conducted by the HR Manager (Deputy CEO).
- c. The Deputy CEO of Develop may also be involved from a HR position as any serious allegations against a member of staff may require the individual to be suspended pending investigation.
- d. The CEO (or Chair of Board) will gather information about the allegation, and report these without delay to LADO.

#### 15. Allegations by a learner against another learner

- a. If allegations are made by a learner against another learner, the Safeguarding and Well-being Manager/Deputy Safeguarding Lead must be informed and will refer to the relevant organisations, as deemed appropriate. Please inform us using CPOMS.

#### 16. Recruitment and Selection Procedures

- a. Develop follows safer recruitment principles when recruiting staff and volunteers who will work with children, young people and vulnerable adults. Please see Recruitment of Staff Policy.
- b. In order to ensure that everyone is protected whilst at Develop, we will ensure that our employees and volunteers are carefully selected, screened, trained and supervised.
- c. Develop has a responsibility to ensure safe recruitment and employment practices. All employees and volunteers are vetted appropriately before commencement of employment/voluntary position, including a DBS check.

#### 17. Disclosure and Barring Service (DBS)

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- a. All individuals working with children, young people and vulnerable adults will be made aware of DBS processes and regulations.
- b. Develop will ensure rapid and efficient interaction with DBS with regard to the discovery of new and relevant information relating to any individual.
- c. DBS checks and any subsequent queries or concerns will be conducted through official channels and in keeping with the Data Protection Act 2018.
- d. CEO has overall responsibility for the DBS policy.
- e. Develop recognises its legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
  - The harm test is satisfied in respect of that individual;
  - The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed offence and
  - The individual has been removed from (paid or unpaid) regulated activity, or would have been removed had they not left.

This will be the responsibility of the CEO

**17.6.** Develop will refer information to the DBS where an individual is deployed to another area of work that is not regulated activity, or they are suspended in regards to point 17.5.

## 18. Identification Badges

- a. Develop have taken the view that it is appropriate for employees to wear ID badges especially when representing Develop and will make their own arrangements for issuing such badges to all staff.

## 19. Training

- a. Develop has a duty to promote safeguarding issues and measures to staff and ensure they:
  - Analyse their own practice against established good practice, and assess risk to ensure their practice is likely to protect them from false allegations.
  - Recognise their responsibilities and report any concerns about suspected possible abuse or poor practice.
- b. The Safeguarding and Well-being Manager is required to undertake a minimum of level two training in safeguarding and inter-agency working, and receives refresher training at least every two years. They will also undertake appropriate training on current safeguarding issues and legislation.
- c. Other Designated Safeguarding staff are required to have training in safeguarding and inter-agency working and receive refresher training at least every two years.
- d. All employees/volunteers working directly with children, young people and adults at risk will undertake appropriate training on safeguarding to raise awareness of

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- current issues and legislation every two years.
- e. Mandatory training for all employees and volunteers working directly with learners will take the form of attendance on the relevant face to face course every two years or more frequently if appropriate. The mandatory training for those working directly with learners must not just take the form of E-Learning.
  - f. All employees/volunteers will receive an induction on commencement of service which will include online training of “An Awareness of Child Abuse and Neglect”. In addition, they will be given a copy of Part A of the Department of Education’s “Keeping Children Safe in Education” and they will be required to sign to say that that they have read, received and understood this document.
  - g. Safeguarding training is mandatory to all Develop employees/volunteers. Refusal to undertake safeguarding training, will be a matter of gross misconduct, and may lead to dismissal.
  - h. Safeguarding Training will be required to be undertaken by all Board Members.
  - i. Safeguarding Training will be regularly reviewed by Heads of Centre during staff reviews and with consultation with the Safeguarding and Well-being Manager.

## 20. Health and Safety

- a. The Health and Safety Manager has overall responsibility for health and safety matters and will work closely with the Safeguarding and Well-being Manager on all matters relating to Safeguarding.
- b. Develop will ensure the safety of children, young people and vulnerable adults through the following measures:
  - Risk assessment will be carried out by qualified individuals in all areas and settings where Develop is responsible.
  - Develop practice will be carried out in accordance with *Health and Safety at Work, etc Act 1974*, the *Management of Health and Safety at Work Regulations 1999* and Develop’s Health and Safety policy.
  - Non-qualified individuals will be aware of Health and Safety procedure and refer any concerns or queries directly to qualified personnel.
- c. Wherever relevant and possible, Develop will promote good health and safety practice when:
  - Undertaking excursions, trips or any other activity taking place away from Develop premises.
  - Children, young people and vulnerable adults are required to travel alone or unsupervised to and/or from any activity, event or training organised by Develop.
  - Develop recognises that Health and Safety is vital to safeguarding children, young people and vulnerable adults and accordingly will ensure that it remains a priority.

## 21. Monitoring and Evaluation

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- a. Through an annual review of this Policy.
- b. Through the Safeguarding Quality Improvement Group.
- c. Through Local Multi Agency Arrangements, inter-agency communication, training and feedback.
- d. This policy is liable to full equality impact assessment annually.

Policy signed by CEO: *Mark Pike*

Date: 22/04/2021

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## Appendix A – Develop Safeguarding Responsibilities/Contact

Name	Safeguarding Responsibility	Telephone	Mobile	email	Site
Mark Pike	CEO/RAP Deputy Safeguarding Lead	01525 408080	07900413490	<a href="mailto:pikem@developebp.co.uk">pikem@developebp.co.uk</a>	Head Office
Rachael Wrapson	Safeguarding and Well-being Manager/ WRAP	01525 408690	07712395302	<a href="mailto:wrapsonr@developebp.co.uk">wrapsonr@developebp.co.uk</a>	Head Office
Wayne Taylor	Head of Centres/ Designated Safeguarding Representative /WRAP	01582 690954  01462 510413	07827340276	<a href="mailto:taylorw@developebp.co.uk">taylorw@developebp.co.uk</a>	Develop Dunstable  Develop Hitchin
Darshan Ohbi	Head of Centre/ Designated Safeguarding Representative /WRAP	01234 262004	07827340288	<a href="mailto:ohbid@developebp.co.uk">ohbid@developebp.co.uk</a>	Develop Bedford

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Appendix B –Useful Links for Safeguarding

<b>Luton Police Protection Unit</b> 01582 394250 (South)	<b>Luton MASH</b> Tel: 01582 547653 MASH@luton.gcsx.gov.uk	<b>Luton Multi Agency Arrangements</b> Tel: 01582 547590	<b>Luton LADO</b> Tel: 01582 548069
<b>Bedfordshire Police Protection Unit</b> Tel: 01234 846960 (North)	<b>Bedford Multi Agency Support Hub</b> Tel: 01234 718700	<b>Bedford Multi Agency Arrangements</b> Tel: 01234 276512	<b>Bedford LADO</b> Tel: 01234 276693
<b>Bedfordshire Police Protection Unit</b> Tel: 01234 846960 (North)	<b>Central Bedfordshire Access and Referral</b> Tel: 0300 300 8585	<b>Central Beds Multi Agency Arrangements</b> Tel: 0300 300 6455	<b>Central Bedfordshire LADO</b> Tel: 0300 300 4833
<b>Norfolk Police Family Protection Unit</b> Tel: 01603 276313	<b>Norwich Children’s Services</b> Tel: 0344 800 8014	<b>Norfolk Multi Agency Arrangements</b> Tel: 01603 223409	<b>Norfolk LADO</b> Tel: 01603 223473
<b>Thames Valley Police Protecting Vulnerable People Unit</b> Tel: 01296 39650	<b>Milton Keynes Multi Agency Support Hub</b> Tel: 01908 691691	<b>Milton Keynes Multi Agency Arrangements</b> Tel: 01908 254373	<b>Milton Keynes LADO</b> Tel: 01908 254373
<b>Hertfordshire child abuse investigation unit</b> Tel: 01707 354000	<b>Hertfordshire Children’s Information Services</b> Tel: 0300 123 4043	<b>Hertfordshire Multi Agency Arrangements</b> Tel: 01992 555420	<b>Hertfordshire LADO</b> Tel: 01992 555420
<b>Suffolk Police Family Protection Unit</b> Tel: 0800 800 4005	<b>Suffolk Multi Agency Safeguarding Hub</b> Tel: 0800 800 4005	<b>Suffolk Multi Agency Arrangements</b> Tel: 03456 061 499	<b>Suffolk LADO</b> Tel: 0300 123 2044
<b>Essex Police Protecting Children and Vulnerable Unit</b> Tel: 01245 291600	<b>Essex Children &amp; Families Hub</b> Tel: 0345 603 7627	<b>Essex Multi agency Arrangements</b> Tel: 0345 603 7627	<b>Essex LADO</b> Tel: 03330 139 979

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Appendix C – Dealing with Safeguarding Flowchart – Ampthill

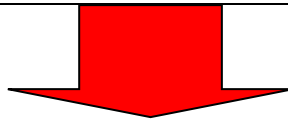
**Dealing with Safeguarding/Prevent Concerns**

**ALL Staff and Volunteers**

You have a statutory and moral duty to ensure the promotion of the welfare of young people and vulnerable adults receiving education and training, this includes reporting concerns.

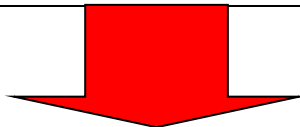
If you observe, note or have reported to you:

- Worrying or changed behaviour of a learner
- Physical evidence of injury
- Evidence of self-harming or placing themselves in risky situations
- Showing risk taking behaviour
- An allegation of abuse made by a learner / third party
- Disclosures, information or incidents that are of a safeguarding concern



**DO NOT TAKE ANY ACTION YOURSELF**

Immediately contact your Safeguarding and Well-being Manager, Rachael Wrapson, to discuss your concern on 01525 408690 or 07712395302. If Rachael is unavailable please contact the Deputy Safeguarding Lead, Mark Pike on 01525 408082 or 07900413490. All reports must be made within 24 hours of the concern.



The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

**Your Safeguarding and Well-being Manager:**

Rachael Wrapson ([wrapson@developebp.co.uk](mailto:wrapson@developebp.co.uk))

**Deputy Designated Safeguarding Representative in Ampthill:**

Mark Pike 01525 408082 or 07900413490

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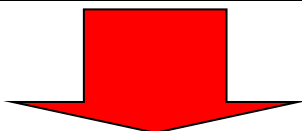
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- Disclosures, information or incidents that are of a safeguarding concern



**DO NOT TAKE ANY ACTION YOURSELF**

Immediately contact your Designated Safeguarding Representative to discuss your concern or call Rachael Wrapson, Safeguarding and Well-being Manager, on 01525 408690 or 07712395302, if they are unavailable. All reports must be made within 24 hours of the concern.



The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

**Your Designated Safeguarding Representative:**

Darshan Ohbi

**Designated Safeguarding Representatives in Ampthill:**

Rachael Wrapson, Safeguarding & Well-being Manager – 01525 408690 or 07712395302  
 Mark Pike, Deputy Designated Safeguarding Lead – 01525 408082 or 07900413490

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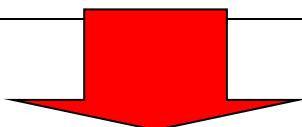
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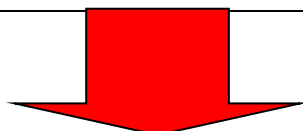
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- Disclosures, information or incidents that are of a safeguarding concern



**DO NOT TAKE ANY ACTION YOURSELF**

Immediately contact your Designated Safeguarding Representative to discuss your concern or call, Rachael Wrapson, Safeguarding and Well-being Manager, on 01525 408690 or 07712395302 if they are unavailable. All reports must be made within 24 hours of the concern.



The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

**Your Designated Safeguarding Representative:**

Wayne Taylor

**Designated Safeguarding Representatives in Ampthill:**

Rachael Wrapson, Safeguarding & Well-being Manager – 01525 408690 or 07712395302

Mark Pike, Deputy Designated Safeguarding Lead –01525 408082 or 07900413490

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**DO NOT TAKE ANY ACTION YOURSELF**

Immediately contact your Designated Safeguarding Representatives to discuss your concern or call Rachael Wrapson, Safeguarding and Well-being Manager, on 01525 408690 or 07712395302 if they are unavailable. All reports must be made within 24 hours of the concern.



The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

**Your Designated Safeguarding Representatives:**

Wayne Taylor

**Designated Safeguarding Representatives in Ampthill:**

Rachael Wrapson, Safeguarding & Well-being Manager – 01525 408690 or 07712395302

Mark Pike, Deputy Designated Safeguarding Lead – 01525 408082 or 07900413490

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Version No.	Date Issued	Created by	Approved by
2.4	22/04/2021	Rachael Wrapson	Mark Pike

**Dealing with Safeguarding/Prevent Concerns**

**ALL Staff and Volunteers**

You have a statutory and moral duty to ensure the promotion of the welfare of young people and vulnerable adults receiving education and training, this includes reporting concerns.

If you observe, note or have reported to you:

- Worrying or changed behaviour of a learner
- Physical evidence of injury
- Evidence of self-harming or placing themselves in risky situations
- Showing risk taking behaviour
- An allegation of abuse made by a learner / third party
- Disclosures, information or incidents that are of a safeguarding concern



**DO NOT TAKE ANY ACTION YOURSELF**

Immediately contact your Designated Safeguarding Representative to discuss your concern or call Rachael Wrapson, Safeguarding and Well-being Manager, on 01525 408690 or 07712395302 if they are unavailable. All reports must be made within 24 hours of the concern.



The Designated Safeguarding Representative/Lead will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

**Your Designated Safeguarding Representative:**

Wayne Taylor

**Designated Safeguarding Representatives in Ampthill:**

Rachael Wrapson, Safeguarding & Well-being Manager – 01525 408690 or 07712395302

Mark Pike, Deputy Designated Safeguarding Lead – 01525 408082 or 07900413490

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Appendix H – Dealing with Safeguarding Flowchart – Outreach

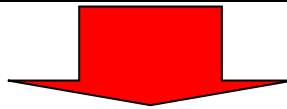
**Dealing with Safeguarding/Prevent Concerns**

**ALL Staff and Volunteers**

You have a statutory and moral duty to ensure the promotion of the welfare of young people and vulnerable adults receiving education and training, this includes reporting concerns.

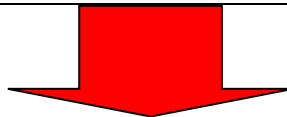
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- Evidence of self-harming or placing themselves in risky situations
- Showing risk taking behaviour
- An allegation of abuse made by a learner / third party
- Disclosures, information or incidents that are of a safeguarding concern



**DO NOT TAKE ANY ACTION YOURSELF**

Immediately contact Rachael Wrapson, Safeguarding and Well-being Manager, on 01525 408690 or 07712395302. All reports must be made within 24 hours of the concern.



Rachael or Mark will advise you what action to take. They have the responsibility for making contact with any outside agencies e.g. Police or Social Workers.

**Other Safeguarding Representative in Ampthill:**

Mark Pike, Deputy Designated Safeguarding Lead – 01525 408082 or 07900413490

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## Table of substantive changes

### V1.4

Where in policy?	What are the changes	Date changes made
Section 3 – Key Principles.	Keeping Children Safe in Education document updated in September 2016.	September 2016
Section 3.4 – Key Principles	External Speakers and Visitors without DBS clearance will be supervised at all times.	June 2017
Section 4 Designated Persons & Appendices	Change of Designated Safeguarding Lead name from Vee Rourke to Aimee Sykes. WRAP Lead now Mark Pike.	September 2016
Section 6.7 – Child Welfare	DSL's will adhere to Lone Working Policy when receiving disclosures	June 2017
Section 8 – Definitions.	Addition of honour based violence and breast ironing.	September 2016

### V1.5

Where in policy?	What are the changes	Date changes made
Start	Title and contents page added.	June 2017
Throughout Policy	Designated Safeguarding Lead changed to Safeguarding and Well-being Manager.	June 2017
Section 8 – Definitions	Addition of Peer on Peer Abuse and Teenage Relationship Violence. Change to CSE definition.	June 2017
Sections 10 & 11 – Reporting and Recording Concerns/ Discloses	Changed section 10 & 11 sequence. Providing details on how this can be done.	June 2017
Section 19.5 & 19.6 – Training	Changes to the requirements of staff safeguarding training, induction Materials and expectations.	June 2017
Appendices	Addition of Hertfordshire & outreach programme flowcharts (Appendices G & H).	August 2017

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## V2.0

Where in policy?	What are the changes	Date changes made
Sections 6, 7 and 11	Information on Peer on Peer abuse added.	22/10/2018
Section 8	Information on Domestic Abuse/Violence, Cyberbullying, Child Criminal Exploitation (County Lines), Sexual violence and sexual harassment between children, contextualised safeguarding and Modern Slavery added. Additional information added regarding Peer on Peer abuse.	22/10/2018
Section 17	DBS legal duty to refer staff who has harmed, or poses a risk of harm, to a child or vulnerable adults added.	22/10/2018

## V2.1

Where in policy?	What are the changes	Date changes made
Appendices A & C	Removal of John Greenwood as Safeguarding Lead at Norwich	01/04/2019

## V2.2

Where in policy?	What are the changes	Date changes made
Appendices A & C	Removal of Catherine Hegarty as Safeguarding Lead at Norwich	01/05/2019

## V2.3

Where in Policy?	What are the changes	Date changes made
Section 4	Removal of Aimee Sykes as Deputy Designated Safeguarding Lead and insertion of Mark Pike as Deputy Designated Safeguarding Lead	14/10/2019
Section 8.9	Peer on peer Abuse as a specific	14/10/2019

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	safeguarding issue Upskirting as a form of Peer on Peer abuse, its definition and criminal offence information	
Section 8.12	Serious Violence added	14/10/2019
Section 8.13	Honour Based Violence is replaced by Honour Based Abuse	14/10/2019
Section 8.14	Forced Marriage is now Honour Based Abuse	14/10/2019
Section 10	Local Safeguarding Children's Boards have been replaced by Multi Agency Arrangements	14/10/2019
Section 11	Use of CPOMS to report all concerns	14/10/2019
Section 12.2	Data Protection Act 1098 is replaced by Data Protection act 2018	14/10/2019
Section 15	Use of CPOMS to report all concerns	14/10/2019
Section 19.5	Staff Safeguarding training will be every two years or more frequently if appropriate	14/10/2019
Section 21	Local Safeguarding Children's Boards have been replaced by Multi Agency Arrangements	14/10/2019
Appendix A	Removal of Aimee Sykes as Deputy Designated Safeguarding Lead and insertion of Mark Pike as Deputy Designated Safeguarding Lead  Wayne Taylor replaces Johanne Kenlin as Designated Safeguarding Lead for Hitchin	14/10/2019
Appendix B	LSCBs in all Counties now known as Multi Agency Arrangements	14/10/2019
Appendices C – H	Mark Pike as Deputy Designated Safeguarding Lead, replacing Aimee Sykes	14/10/2019

## V2.4

Where in	What are the changes	Date changes made
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<b>policy?</b>		
Section 4	Removal of Barry George, Chair of the Board	19/04/2021
Section 14	New guidance on how to report Sexual Abuse/Harassment in education for staff and Learners	19/04/2021
Appendix A	Removal of Barry George, Andy Smith and Kerry Lymbery	19/04/2021
Appendix F	Removal of Andy Smith and Kerry Lymbery. Replaced with Wayne Taylor	19/04/2021

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