



## Active Communities Network Safeguarding Policy- England

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## **1. Introduction**

Active Communities Network is committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of “it could happen here” and that they recognise that safeguarding is everyone’s responsibility.

We are fully committed to creating a culture of vigilance. We expect everyone who works in and visits our organisation to share this commitment. We encourage staff, volunteers, service users and visitors to report anything that concerns them, and to maintain an attitude of “it could happen here”. We will always act in the best interest of the child. We are committed that under no circumstances should any staff member or volunteer inflict physical or psychological harm to young people. Where we have vulnerable adults, we will work with them to promote an individual’s welfare, particularly when it comes to protecting them from abuse.

Our community and service users are supported to stay safe, including when online, and to recognise when they may be at risk. We ensure that children and vulnerable adults know how to get help when they need it. In line with the latest Working Together to Safeguard Children, we place importance on contextual safeguarding and consider risks in our local community when assessing the safety of our service users.

## **2. Equality Statement**

The Charity is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics).

## **3. Definitions**

In line with the Department for Education Guidance - [After-school clubs, community activities, and tuition safeguarding guidance for providers](#) we recognise that safeguarding is everybody’s responsibility and define safeguarding as:

- protecting children from maltreatment
- preventing impairment of children’s mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- taking action if you identify or have concerns that children are suffering from, or are at risk of harm

## Definition of Terms

|                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Children & Young People         | Anyone under the age of 18 years                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Adults at Risk                  | Anyone over the age of 18 who is: <ul style="list-style-type: none"> <li>• In need of community care services,</li> <li>• Unable to care for themselves,</li> <li>• Unable to protect themselves against significant harm or exploitation,</li> <li>• Has a physical or sensory disability,</li> <li>• Is physically frail or has a chronic illness,</li> <li>• Has a mental illness or dementia,</li> <li>• Has a learning difficulty,</li> <li>• Misuses drugs and/or alcohol,</li> <li>• Has social and/or emotional issues,</li> <li>• Exhibits challenging behaviours</li> </ul> |
| Staff, employees and volunteers | Anyone working for, or on behalf of Active Communities Network whether paid or voluntary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Service users                   | Individuals of any age who attend Active Communities Network.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

## 4. Key contacts

| Name                      | Role                               | Area of operation                                | Contact details                  |
|---------------------------|------------------------------------|--------------------------------------------------|----------------------------------|
| Oliur Rahman Co CEO       | Designated Safeguarding Lead (DSL) | Co-CEO Active Communities Network                | Oliur@activecommunities.org.uk   |
| Shinead Philpott Director | Deputy DSL(s)                      | Director of Programmes Active Communities.org.uk | shinead@activecommunities.org.uk |
| Mary Clarke               | Safeguarding Trustee/Board         | Trustee                                          | m.clarke@newstartedu.org.uk      |

|                |                                           |                   |                                                                                                                                         |
|----------------|-------------------------------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
|                | representative                            |                   |                                                                                                                                         |
| Eva Simcock    | Local Authority Designated Officer (LADO) | Southwark Council | <a href="tel:02075250689">020 7525 0689</a><br><a href="mailto:gau.safeguarding@southwark.gov.uk">gau.safeguarding@southwark.gov.uk</a> |
| Deborah Carter | Senior Safeguarding Manager               | Lambeth Council   | 07935602437<br>DCarter@lambeth.gov.uk                                                                                                   |

We are part of Southwark Council local authority. We follow Southwark Council multi-agency safeguarding arrangements put in place by the safeguarding partners. Further detail can be found here.

<https://www.southwark.gov.uk/children-and-families/child-protection-and-safeguarding/professionals-working-children/child-3>

## **5. Roles and responsibilities**

### **5.1 Designated Safeguarding Lead (and deputies):**

- The DSL will take lead responsibility for safeguarding with the support of any Deputy DSLs.
- Be available during operating hours for staff, service users or their parents or carers to discuss any safeguarding concerns.
- Be aware of the local criteria for action and the local protocol for assessment which can normally be found on the relevant local authority website.
- Lead on referrals to local authority children's social care, the Channel Programme where there is a radicalisation concern, the DBS where relevant in relation to allegations of abuse made against staff or volunteers, and where a crime has been committed to the police as required, this guidance may be used to inform such decisions [NPCC- When to call the police.](#)
- Understand what early help is and how to identify children and families who may benefit from early help and refer or signpost them to the right agencies for support.
- Act as a source of support, advice and expertise for all staff and volunteers.
- Act as a point of contact with the safeguarding partners and share information with them as required.

- Liaise with the organisation's leaders to keep them informed of issues, especially police investigations and ongoing enquiries under section 47 of the Children Act 1989.
- Liaise with the case manager as required and the LADO for child protection concerns in cases which concern a staff member or volunteer.
- Promote engagement with service users and their parents, family members and/or carers in safeguarding and promoting the welfare of children and where appropriate, vulnerable adults.
- Ensure records are kept in line with good record-keeping practice.
- Ensure that this policy and safeguarding procedures are accessible to the organisations community, reviewed at least annually and available publicly and to our service users and their parents or carers.
- Maintain records of safeguarding training including online safety and refresher training for all staff and volunteers.
- Liaise with local safeguarding partners where relevant and participate in multi-agency training where required
- Update DSL and deputies training every two years covering the content outlined in the guidance.
- Update own knowledge and skills at least annually.
- Work to understand the views of service users and encourage a culture of listening to their wishes and feelings.
- Hold and share information in line with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and the guidance around information sharing in KCSIE.
- Active Communities Network will notify the local authority if we become aware of any private fostering, to allow the local authority to check the arrangement is suitable and safe for the child. Private fostering occurs when a child under the age of 16 (under 18, if disabled) and is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

## **5.2 Trustees**

- Review and approve this policy at each review and hold the organisation to account over its implementation.
- Appoint a safeguarding trustee committee member to oversee safeguarding compliance and the effectiveness of this policy.
- Read and understand all relevant guidance and review this at least annually.
- Engage with safeguarding training, including training at induction, which equips the board with the skills to provide strategic challenge in relation to safeguarding.
- Be aware of the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) that places duties on organisations and individuals to process personal information fairly and lawfully and to keep information they hold safe and secure. In addition, adhere to the [ICO](#)

[guidance](#), which includes information about the obligations and how to comply with these.

### **5.3 All staff, employees and volunteers must:**

- Receive appropriate safeguarding and child protection training and refreshers including online safety.
- Receive safeguarding updates regularly through email and regular staff meetings at least quarterly that provides the relevant skills and knowledge to safeguard children effectively.
- Understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) or to access Early Help services.
- Know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality.
- Know not to promise a child that they will not tell anyone about a report of any form of abuse.
- Reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- Understand that the process for making referrals locally, what the routes are after referral and the assessment processes and have awareness of the NSPCC helpline.
- Know that if a child is suffering (or is likely to suffer) immediate harm, it is important to make a referral to children's social care and where relevant contact the police and your local authority designated officer at once.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.
- Know the indicators of abuse and neglect and the specific safeguarding issues that can put children at risk of harm and undertake appropriate training.
- Be aware of extra-familial and/ or contextual risks which occur outside of the families e.g. sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online.
- Have a responsibility to highlight any concerns or risks to the safeguarding and protection of vulnerable adults.
- Know how to report concerns about safeguarding practices within the organisation via whistleblowing procedures or other means.
- Know how to report concerns if staff have a safeguarding concern, or an allegation is made about another member of staff (including volunteers and contractors) harming or posing a risk of harm to children or vulnerable adults.
- Attend and engage with induction training, including reading and understanding our:
  - safeguarding policy

- the staff/volunteer behaviour policy/code of conduct

## **6. Responding to and recording concerns**

When staff or visitors to the organisation have a safeguarding concern, they should promptly contact the DSL (or deputy) by email or phone.

All staff/volunteers should know what to do if an individual tells them they or someone else is being abused, exploited, or neglected and to maintain an appropriate level of confidentiality. All staff and volunteers should know to act upon concerns about a child or vulnerable adult's welfare immediately.

All staff and volunteers should do the following when responding to concerns:

- Listen carefully,
- Not confront the alleged abuser,
- Take notes on what the child says as soon as possible after the disclosure,
- Reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- Explain what the individual and organisation will do next (if age appropriate),
- Report the abuse without delay using the appropriate procedures in the setting,
- Not investigate the disclosure themselves and take advice from relevant roles,
- Understand that individuals may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.

If a member of staff/volunteer is concerned by verbal conversations, disclosures, or signs of abuse or neglect these should immediately be recorded in writing and passed to the DSL. If the member of staff is unsure, they should always speak to the DSL or a deputy regarding their concerns.

The DSL will then decide what action must be taken, which can include:

- Further support or monitoring within the organisation
- Referral for an Early Help assessment
- Referral to social care and/ or the police

If the DSL and deputies are not available, a staff member should not delay and should consider speaking to another senior member of staff or contact local social care or [the NSPCC for advice](#) or to make a referral. Any such action should be shared with the DSL as soon as is practically possible.

Service users and their parents or carers may raise any concerns through contacting the DSL or deputies or by using our Complaints Procedure which can be found online

Parents and vulnerable adults should be aware that referrals can be made where there is suspected abuse or neglect by the organisation and that our concerns regarding an individual will be shared with relevant authorities. For children the organisation will always seek to share these concerns and the referral with parents first, unless to do so would put the child at greater risk of harm, where we are advised not to, or where it has not been practicable to. For vulnerable adults the organisation will discuss these concerns with the service-user and any relevant carers and consider together the best course of action.

Staff/volunteers will provide first-hand a summary of their concern or detail of a disclosure they have received. They will use professional language and try to capture the incident as it took place or as it was described to them. They will report all concerns in a timely fashion. The safeguarding team will ensure that any action taken, or outcome is accurately recorded in line with good record-keeping guidance which should follow:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved, and
- A note of any action taken, decisions reached and the outcome.
- The rationale for the action taken including where a decision to refer, or not, to external agencies has been made.

Service users can confidently report concerns knowing that these concerns will be treated seriously, and that they can express their views and give feedback too. This can be done through a variety of means which include contacting [info@activecommunities.org.uk](mailto:info@activecommunities.org.uk) or contacting the area lead.

## **7. Records and information sharing**

Active Communities Network recognises the importance of effective record keeping and follow the following principles to support this:

- Maintain records of contact with child/ young person and their family/ carer outside of any planned and expected interaction,
- Records should be objective and distinguish between fact and opinion,
- Personal information, other than the individual's name, should be kept separate from information about other people,
- Records should clearly include the full name of the person who has reported the concern and the time and date this was logged, they must be recorded first-hand,
- Records should be created in a timely manner,

- Records should be kept securely and only the DSL and relevant senior colleagues should have access to safeguarding records,
- The recording of information and the reasons for this should be shared with service users (if age appropriate) or their parents or carers where to do so would not increase a risk of harm,
- Records are retained in line with the organisation's retention schedule, which is informed by national guidance,
- Where referrals are made to external agency a written record of this is retained, where referrals are made via the telephone this is confirmed in writing within 48 hours.

We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children or vulnerable adults whether this is when problems are first emerging, or where an individual is already known to the local authority children's social care.

We have due regard to the relevant data protection principles, understanding that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. At Active Communities Network, we understand that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

## **8. Site safety**

All staff members and volunteers have a responsibility to ensure the activity site is secure and to report any concerns that may occur.

The identity of all visitors and volunteers coming into an activity site is checked.

Active Communities Network will not accept the behaviour of any individual, parent or anyone else, that threatens the security of the site or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the site and advice being sought from our local safeguarding partners.

For further information about our Health and Safety procedures and risk assessments please refer to <https://www.activecommunities.org.uk/>.

## **9. Whistleblowing and Complaints**

At Active Communities Network, we recognise that poor processes and procedures may cause harm.

Any member of staff or volunteer with concerns about poor or unsafe practice and potential failures in our safeguarding regime should see the Whistleblowing policy contact: <https://www.activecommunities.org.uk/>

Where an individual feels unable to raise an issue with the organisation, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general advice on whistleblowing can be found at the [Gov.uk](https://www.gov.uk) website.
- the [NSPCC Whistleblowing Advice Line](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their organisation.

Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Service users and their parents or carers can raise concerns via our complaints policy which can be found here. <https://www.activecommunities.org.uk/>

## **10. Individuals with special educational needs and disabilities**

At Active Communities Network, we are aware of our responsibilities under the Equalities Act 2020 and abide by this legislation.

We recognise that children and vulnerable adults with social workers may potentially be at greater risk of harm and need further support. Individuals may need this support due to abuse, neglect, exploitation or complex family circumstances. Staff are aware that these individuals may face additional barriers. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place.

Service users with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding barriers when recognising abuse and neglect for reasons including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to their disability without further exploration
- being more prone to peer group isolation than others
- the potential for those with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

- communication barriers and difficulties in overcoming these barriers.
- cognitive understanding- being able to understand the difference between fact and fiction in online content and then repeating the content/ behaviours within the organisation or the consequences of doing so.

At Active Communities Network we identify individuals who may be more at risk of harm and take action to ensure their safety.

## **11. Online safety**

We recognise that the use of technology has become a significant component of many safeguarding issues, including child-on-child abuse. We recognise that children and vulnerable adults need to be safeguarded from potentially harmful and inappropriate online material and the organisation's role within this. To address this, our organisation strives to:

- Have clear procedures in place to ensure the online safety of all staff and service users,
- Educate our community in the safe and responsible use of online technology where this is used,
- Set clear expectations for the use of online technology, including mobile phones.

Our approach to online safety is framed by four main areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

To address the risks above, as an organisation we will:

- Teach about online safety as a part of any online activities that we may undertake.
- Train all staff in online safety, including at induction

We have clear guidance for our community on acceptable use of technology and the use of mobile phones and smart technology and our Mobile Safety Policy aligns with this.

Staff and service users should report concerns about online safety or conduct in line with this policy.

## **12. Child-on-child abuse**

In line with our strong commitment to safeguarding, at Active Communities Network, we believe that all children have a right to be in a safe environment and take a strong approach to child-on-child abuse which includes preventative work, appropriate responses, and a zero-tolerance approach to abuse.

Our staff recognise that children of any age or gender can be capable of abusing other children, which can happen both inside and outside of the setting and online.

This child-on-child abuse can include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting which is a criminal offence
- initiation-type violence and rituals

All the above are examples of abuse and should never be tolerated or passed off as “banter,” “just having a laugh”, “boys will be boys” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Further information on our approach can be found in our anti-Harassment and bullying policy found here; <https://www.activecommunities.org.uk/>

We recognise that the gendered nature of child-on-child abuse makes it more likely that girls will be victims and boys perpetrators but all reports will be taken seriously. All concerns should be passed onto the DSL (or a deputy).

All staff understand the importance of challenging and reporting inappropriate behaviours between peers and their role in preventing and responding to child-on-child abuse. Our staff understand that even if there are no reports of child-on-child abuse in our organisation, it does not mean child-on-child abuse is not happening-it may be the case that it is just not being reported. Children can report any child-on-child abuse by speaking to a lead worker including a youth worker, mentor, coach or volunteer or reporting via email to a trusted adult within the organisation including a youth work, mentor, coach.

Any cases of child-on-child abuse will be thoroughly investigated, with the victim always being taken seriously and both the victim and alleged perpetrator given

appropriate support. Support will take the child's wishes into account. We will liaise with the police and children's social care as necessary. Where there has been a report of sexual violence, an immediate risk assessment will be made, considering the needs of the victim, the alleged perpetrator, and our other pupils. All allegations of child-on-child abuse will be recorded in our safeguarding files.

We record these incidents in line with our normal record-keeping process (see section 5).

### **Appendix 1: Types of abuse and safeguarding concerns**

These types of abuse and safeguarding concerns align with the KCSIE definitions. Whilst KCSIE applies to schools and colleges, it may also be useful for out-of-school settings as 'best practice'. These definitions focus on children. Vulnerable adults may also be the victim of abuse, and our staff are taught to consider these definitions when working with vulnerable adults.

KCSIE splits abuse into four main categories:

#### **Physical abuse:**

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

#### **Emotional abuse:**

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

#### **Sexual abuse:**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children

in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:**

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

**Child Criminal Exploitation (CCE):**

Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late

**County lines:**

A term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

**Serious violence:**

Where children are involved with serious violent crime. Indicators may include increased absence from school, 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. There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

**Child Sexual Exploitation (CSE):**

Occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. Indicators can be similar to the indicators of CCE, as well as:

- referring to older children or adults as 'boyfriends' or 'girlfriends'; and
- children who suffer from sexually transmitted infections or become pregnant.

**Modern Slavery and the National Referral Mechanism:**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

**Child abduction and community safety incidents:**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

**Cybercrime:**

Criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

### **Domestic abuse:**

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children and therefore children are now classified as victims and not merely witnesses where domestic abuse occurs. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Homelessness:**

Being homeless or being at risk of becoming homeless presents a real risk to an individual's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. It should also be recognised in some cases that 16- and 17-year-olds could be living independently from their parents or guardians, for example through their

exclusion from the family home, and will require a different level of intervention and support.

### **'Honour-based' abuse (HBA):**

Encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

### **Forced marriage:**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **Female Genital Mutilation (FGM):**

covers 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.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police.

The duty does not apply in relation to at risk or suspected cases-these should be discussed with the DSL, in line with our referral process.

Potential risk factors may include:

- a female child is born to a woman who has undergone FGM
- a female child has an older sibling or cousin who has undergone FGM
- a woman/family believe FGM is integral to cultural or religious identity
- a parent or family member expresses concern that FGM may be carried out on the girl
- a girl talks about FGM in conversation, for example, a girl may tell other children about it

- being taken on a long holiday to country where FGM is prevalent

### **Radicalisation:**

We recognise that children and adults are vulnerable to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Our organisation adheres to the Prevent duty and we have "due regard to the need to prevent people from being drawn into terrorism". We build individuals' resilience to radicalisation by providing a safe environment for debating controversial issues, promoting fundamental British values.

Staff should be alert to changes in behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying those who might be susceptible to radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

All our staff receive training on the Prevent duty via

<https://www.gov.uk/guidance/prevent-dhhttps://www.gov.uk/guidance/making-a-referral-to-preventuty-training>

If the organisation needs to make a Prevent referral, we following guidance via

<https://www.gov.uk/guidance/making-a-referral-to-prevent>

The following roles in the organisation have completed training in how to make a Prevent referral: DSL

As part of managing the risk of radicalisation, we have clear protocols for ensuring that any visiting speakers, are suitable and appropriately supervised. In England, the Prevent duty complements organisations' other responsibilities for ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Our protocols include following guidance set out within;

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

### **Mental health:**

All staff at Active Communities Network are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where staff have a mental health concern about an individual that is also a safeguarding concern, they should contact the DSL or a deputy DSL and report and record their concerns in line with this policy ([see section 5](#)).

## **Appendix 2-Safer recruitment**

### **New staff**

Relevant staff have completed safer recruitment training. When appointing new staff, we will:

- Verify a candidate's identity, including checking the name on a birth certificate where this is available.
- Provide clear person specifications and role descriptions for all posts.
- Advertise all posts with a clear safeguarding or child protection statement
- Provide an information pack for people interested in each post including a standard application form and separate self-disclosure form.
- Have a process for shortlisting candidates for selection, involving more than one person.
- Have a face-to-face interview or meeting with a panel of more than one person with a transparent scoring system for shortlisting and interviews.
- Obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- Refer where appropriate to our written policy on the recruitment of ex-offenders.
- Verify the candidate's mental and physical fitness to carry out their work responsibilities.
- Verify the person's right to work in the UK.
- If the person has lived or worked outside the UK, make any further checks the organisation considers appropriate.
- Verify professional qualifications, as appropriate.
- Ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State.
- Seek two references, including from the current employer, and ask specific questions about the suitability of the candidate to work with children.
- Consider conducting online searches on shortlisted candidates, reviewing publicly available material for any incidents or issues and notify applicants of this process.
- Have a probation period for staff and volunteers with a review before they are confirmed in post and regular ongoing performance reviews to check suitability and training requirements.
- Have an induction process for all staff and volunteers and provide regular supervision support and annual appraisal on an ongoing basis.
- Ensure that staff are aware of the Sexual Offences Act 2003 – and that it is an offence for a person over the age of 18 to enter into a sexual relationship, or engage in certain other sexual activities, with a young person (aged under 18) where they knowingly coach, teach, train, supervise or instruct them on a regular basis in a sport or religion setting.

## **Existing staff**

If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff. If a member of staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out.

We will follow our legal duty to refer to the DBS if a member of staff 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 relevant offence
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

## **Volunteers**

We will never leave an unchecked volunteer to be left unsupervised or to work in regulated activity. We will obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity. We will undertake a risk assessment when deciding whether to undertake an enhanced DBS certificate for any volunteer not engaging in regulated activity and retain a record of this risk assessment.

## **Trustees**

All trustees will have an enhanced DBS check without barred list information. A barred list check will be completed if a trustee is in regulated activity.

## **Contractors**

We will ensure that any contractor whose work provides them with the opportunity for contact with children will have the appropriate checks. Those contractors engaging in regulated activity will have an enhanced DBS check including barred list information.

For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required.

No contractors who have not had checks conducted upon them will be left unaccompanied.

### **Appendix 3- Statement of procedures for dealing with allegations of abuse against staff and volunteers**

This appendix applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

#### **Allegations that meet the harm threshold**

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation.

We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation.

Allegations of abuse against staff should be reported to the DSL. If the allegation relates to this nominated person allegations should be shared with Director of Programmes or Joint CEO. If the member of staff perceives there to be a conflict of interest, they can refer directly to the LADO. The contact details are available in the key contacts.

The DSL will contact the Local Authority Designated Officer (LADO) immediately for advice and if the individual should be suspended.

Notification of the suspension and reasons will be conveyed in writing to the individual in accordance with the organisation's procedures. There will be no internal investigation before interaction with the LADO and the organisation will act accordingly on the advice provided.

#### **Low-level Concerns**

The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored, and reinforced by staff. Our values are outlined in more detail in our Staff Code of Conduct. Which can be found here. <https://www.activecommunities.org.uk/>

A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

Such behaviour can exist on a spectrum. Our organisations' response to low-level concerns is an extension of our Code of Conduct. Staff are able to share their concerns confidentially in a simple and easy manner. It is imperative that where staff do have concerns, they share them as outlined in this policy to support with building a culture of expected behaviour and promoting our values.

Low-level concerns should be reported to the DSL

The DSL will have oversight of all recorded concerns and has ultimate decision-making power in respect of all low-level concerns. Any concerns about the DSL should be reported to Joint CEO.

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual who raised the concern should be noticed, but if the individual wishes to remain anonymous, that will be respected to the extent it is reasonably possible to do so.

Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold. We will also consider whether there are wider cultural issues existing within the organisation that may have enabled the behaviour to occur. If this is found to be the case or a contributory factor, we may review our policies and deliver extra training where we consider this will minimise the events happening again.

## **Learning lessons**

At the conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the organisation's procedures or practice to help prevent similar events in the future.

## **Non recent allegations**

Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

## **Appendix 4 Links to other policies and support**

This policy follows guidance as outlined by:

References to other policies/ procedures

- Complaints procedure,
- Information sharing arrangements,
- Whistleblowing policy
- Behaviour policy (code of conduct),
- Working together to Safeguard Children (2023),
- Health and Safety Policy
- Recruitment of ex-offenders Policy,
- Anti-bullying policy,

## **Local services and early help available:**

- [Kooth](#) -anonymous online counselling and support for young people
- [UK Safer Internet Centre](#) - resources for parents
- [Citizens Advice Service](#) - advice on protecting children
- [Mencap](#) - advice around safeguarding adults

## **This policy is based on guidance from:**

- [After-school clubs, community activities, and tuition – Safeguarding guidance for providers \(2023\)](#)
- [Safeguarding for charities and trustees](#)
- [Working Together to Safeguard Children 2023,](#)
- [Safeguarding Standards and Guidance \(NSPCC\)](#)

