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VLUK SAFEGUARDING POLICY 2021-2022

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1. Purpose

Virtual Learning UK (VLUK) has a responsibility to protect and safeguard the welfare of children and young people they come into contact with. The need for guidelines and procedures is important to ensure that this is done with understanding and clarity.

The person with lead responsibility for safeguarding within the organisation is: Neil Ouldrige, VLUK Designated Safeguard Lead

The following is based on LSCB guidelines. The Local Safeguarding Children Board (LSCB) is the key statutory mechanism for agreeing how relevant organisations will cooperate to safeguard and promote the welfare of children and ensure the effectiveness of what they do.

This document is an overview of safeguarding work at VLUK. In the case of any serious incident VLUK campuses should always make reference to formal LSCB guidance. Procedures can be accessed through the vast websites and LSCBs that cover VLUK sites across the UK.

[‘Working Together to Safeguard Children 2018’](#)

The Managing Directors are expected to monitor policy and procedure through the LSCB safeguarding audit and return the audit to the Local Authority annually.

There are many areas of potential overlap with a range of other policies which are referenced throughout.

2. Safeguarding arrangements

According to Working Together 2018 there are two key principles that underpin safeguarding:

- Safeguarding is everyone’s responsibility
- A Child – Centred Approach.

In order to fulfil their duty under sections 157 and 175 of the Education Act 2002, all educational settings, including Independent Training Providers, to whom the duty applies should have in place the arrangements to develop and improve their practice and the practice of others. In addition, the Designated Safeguard Lead, Senior Leadership Team, Directors and Governing Body have regard to specific guidance given by the Secretary of State under sections 157 and 175 of the Education Act 2002 namely, Safeguarding Children and Safer Recruitment in Education and Dealing with allegations of abuse against teachers and other staff.

3. Awareness and Prevention

3.1 The government has published a policy ([Keeping Children Safe in Education September 2021](#)), in which guidance commenced on 1st September 2021. This policy has been used in formulating VLUK’s safeguarding statement.

3.2 The definition of Safeguarding Children that VLUK and Education Funding Partners’ (EFP) work to is:

- Protecting children from maltreatment

- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes. (Working Together to Safeguard Children 2018, [pages 6/8](#))

This definition covers the full spectrum of safeguarding:

- Universal safeguarding – Working to keep all children and young people safe and create safe environments for all children.
- Targeted safeguarding – Some groups of children are more at risk than others, and it is important to target policies and services to these groups, to help keep them safe from harm i.e. children with additional needs or children in need.
- Responsive safeguarding – Unfortunately, no matter what we do, there will always be some children and young people who suffer harm. We need to respond quickly and appropriately when this happens – supporting children and dealing with those who harm them i.e. children in need of protection.

VLUK also works within a child protection system. Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering or who are likely to suffer significant harm. (Working Together to Safeguard Children 2018, Virtual Learning UK Child Protection Policy).

All staff and volunteers are provided with the Child Protection policy and the process for reporting concerns. Staff acknowledge awareness of systems and policies within VLUK which support safeguarding, when they sign that they have read and understood Part One of the [Keeping Children Safe in Education 2021 statutory guidance](#).

3.3 VLUK fully recognises its responsibilities for safeguarding and promoting the health and well-being of all the children in its care. Our Designated Safeguarding Lead (DSL) Neil Ouldrige and he is assisted by two further DSLs.

4. Support for students who may have suffered abuse or neglect

VLUK are aware that children who are significantly harmed or at risk of significant harm, or who witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. VLUK Education Programmes may be the only stable, secure and predictable element in the lives of children at risk. When at their study programme site their behaviour may be challenging and defiant or they may be withdrawn. VLUK will endeavour to support learners through:

- The content of the curriculum.
- Supporting the appropriate assessment of their needs.
- The VLUK/site ethos, which promotes a positive, supportive and secure environment and gives learners a sense of being valued.
- The VLUK behaviour policy, which is aimed at supporting vulnerable children on the study programmes. VLUK will ensure that the learner knows that some behaviour is unacceptable but they are valued and not blamed for any harm, which has occurred.
- Referral to VLUK's counsellor
- Liaison with other external agencies and educational partners that support the learner.

5. Health and Safety

VLUK has a Health and Safety Policy, which is monitored each term by the Chief Operations Officer and Managing Directors

A copy of this policy can be viewed on request.

The Chief Operations Officer, the member of staff with responsibility for Health and Safety, Director Of Quality & Compliance and the Managing Directors with responsibility for Health and Safety oversee this comprehensive list. Any concerns from staff are reported to any of the above and the site supervisor carries out an initial examination, assessing what remedial action needs to take place.

Each term there is a minimum of one fire drill that practices efficient evacuation from the buildings. Risk Assessments are undertaken for activities, visits, alternative provision, off site activities and trips.

6. First Aid

At all VLUK campuses there are trained members of staff who oversee first aid. There are first aid kits situated at each campus.

When a learner is poorly, or has suffered an accident at a campus there is a protocol for staff to follow:

- A person trained in first aid is consulted
- The incident is logged in the 'hub' on google Drive
- For head injuries a note to parents/carers is issued
- If there is any doubt at all a parent/carer is contacted
- In the case of serious accidents/injuries emergency ambulance services will be called

On matters of an intimate nature, staff are expected to deal with a learner with utmost sensitivity and always to seek guidance from the Designated Safeguard Leads. In almost all situations the parents will be asked to come to the campus immediately so that they are part of the decision-making process for such matters. In rare circumstances the appropriate emergency service will be contacted as a matter of urgency before the parent.

7. Campus Security

7.1 All VLUK study programme campuses provide a secure location, which is controlled by precise management directives to which everyone on campus must adhere. Laxity can cause potential problems to safeguarding. Therefore:

- Site safety procedures are checked and reinforced with all campuses prior to the start of the Academic Year
- Learners are given a campus tour and instructions regarding Campus safety as part of their induction programme
- Doors should be secured to prevent intrusion but to facilitate smooth exit.
- Visitors and volunteers must only enter through the nominated main entrance and after signing in.

7.2 In the event that a learner leaves the learning environment/education programme premises without permission staff should not chase after a learner, but rather report immediately to the VLUK staff. Then parents will be informed of the circumstances. The incident should be logged.

8. Attendance

8.1 Excellent attendance is expected of all learners. Absence from the Education Programme can be an indicator of a safeguarding issue so close monitoring and vigilance is needed from all staff. For details on how to report a safeguarding concern refer to the Child Protection Policy.

When learners are unwell parents are expected to confirm absence by telephone or email immediately. If there is no notification VLUK has a policy of phoning or emailing home to ascertain each learner's whereabouts. For specific information and guidance about the attendance protocols and procedures please see the attendance policy.

8.2 Attendance rates are collated each term and reported termly to the government, and to all parents. Positive measures are in place to encourage learners to attend regularly and punctually and VLUK has a duty to report such issues to the relevant authorities.

9. Safer Recruitment including Staff Conduct

9.1 Appointments of staff and induction of newly appointed staff and work placements. All staff appointed to VLUK will be in compliance with [Keeping Children Safe in Education \(2021\)](#) and will operate within relevant Standards for Safer Recruitment Procedures. People working and volunteering within the organisation are required by law to have a Disclosure and Barring Service (DBS) check at the enhanced level. This will provide any information to the registered body/Local Authority on any convictions, cautions or other police information relevant to the work. The Local Authority will consider the relevance of information on the DBS clearance and may seek further information in line with the Safer Recruitment Policy if there is a cause for concern. Where there is evidence to suggest a risk to working with children a decision will be taken by the Local Authority in consultation with the VLUK Managing Directors as to whether to progress the appointment or not.

9.2 At least one member of the recruitment panel will have completed the accredited Safer Recruitment training.

9.3 All new staff at VLUK will receive an induction session on safeguarding children. New VLUK staff will also undergo Level 2 Child Protection Awareness training.

10. Volunteers/Visitors

10.1 Induction of volunteers:

For extended contact with learners, when learners may be left alone with an adult, or when an adult visitor may be in and around the study programme campus or facility, VLUK initiates an enhanced DBS search. Visitors, who do not yet have clearance, will under no circumstance be left alone with a learner or group of learners.

10.2 Welcoming visitors:

It is the responsibility of the employing statutory agency of the professional personnel visiting a VLUK campus to ensure that their staff have appropriate and up to date DBS checks in place. VLUK will assume that these appropriate DBS checks are in place but can request confirmation of staff identity and DBS clearance at any time should they deem it necessary. All professional personnel visiting VLUK campuses will have an appropriate identity, which they must produce upon visiting the VLUK campus. VLUK staff will check the identity of visitors before admittance into the learning facility and all visitors will be expected to sign in. People undertaking work on site who may not have a DBS check, as it is not pertinent to their employment, will not have unaccompanied access to learners. All other visitors to the campus will be accompanied at all times by staff involved with the VLUK education programme.

10.2 All VLUK staff and other staff involved with the study programmes are expected to wear their identity badges. Staff should report to either the Operations Director or their Assistant Curriculum Leader (ACL) in the event of a lost lanyard.

Lanyards will be given to all visitors. Visitors to the campus must be accompanied at all times and must be challenged if seen walking around the education campus without a member of education programme staff and reported to the Performance Mentor or VLUK Tutor immediately.

11. The Child Protection Policy

11.1 The Designated Safeguard Lead for Child Protection is Neil Ouldrige, there are also two other DSL's employed within the organisation. The designated governor responsible for liaising with Education Funding Partners and external organisations, as appropriate, in the event of allegations being made against the Chief Operations Officer or DSL's, is Neil Holman.

11.2 There is also a detailed Child Protection Policy. It is the duty of the VLUK leadership team and governors to ensure the policy is reviewed annually and any deficiencies within the policy addressed immediately. All VLUK staff have had appropriate Child Protection Training, which is updated at least every two years.

The Child Protection Policy includes a statement on physical restraint. VLUK follows DFE guidelines on use of reasonable force, which asserts that physical restraint may be used if there is the possibility that a learner may be about to cause harm to him/ herself or to another. It also asserts that on no occasion should such physical contact be used as a punishment. For further information, please see the DFE advice on ['use of reasonable force'](#).

11.3 All concerns regarding children at risk of significant harm will be dealt with following the relevant LSCB Procedures via one of VLUK's Designated Safeguard Leads. The contact details for referrals to Children Services will vary dependent on the site raising the concern. One of the VLUK DSL's, will communicate with the relevant LSCB.

12. The Design of the Education Programme and the Enrichment Agenda

12.1 The curriculum deals with safeguarding in two ways:

- The curriculum in the Tutorial curriculum, where relevant issues are discussed with the children. Topics can include such themes as British Values, Drugs, Sex and Relationships

and Stranger Danger, Child Sexual Exploitation and Female Genital Mutilation. Children are encouraged to explore and reflect upon these issues.

- The curriculum is designed so that safety issues within the subject are discussed, and safe practices taught, such as using equipment properly in Performing Arts, PE, sport and Fitness.

At all times there has to be appropriate staffing levels and when the study programme is taken off site, appropriate and agreed learner/adult ratios are maintained. The lead adult always assesses visits as to the level of risk and all trips are finally authorised by the Acting Head of Quality or Chief Operations Officer.

Visiting speakers, with correct clearance, are always welcome onto VLUK campuses so that they can give specialist knowledge to the learners.

12.3 Introduction and development of a range of Tutorial/PSHE materials helps to develop resilience and reduce vulnerability. The resources focus on teaching social, emotional and behavioural skills to all learners. This helps to develop the learner's emotional health and well-being. learners with good self-esteem value and seek to protect themselves and others.

13. Internet Safety

13.1 learners should be encouraged to use the internet as much as possible, but, at all times, in a safe way. If teachers know of misuse, either by a teacher or child, the issue should be reported to the Assistant Curriculum Leader, Acting Head of Quality or Chief Operations Officer without delay.

13.2 VLUK staff will promote safe internet provision through its internet provider.

13.3 VLUK operates an agreed Acceptable Use Policy. VLUK update their guidance in accordance with the DFE's [Teaching Online Safety in Schools](#) and the [Online safety in schools and colleges: Questions from the Governing Board](#)

13.4 For further information refer to VLUK's Online E-safety Policy.

14. Diversity and Equality (To include duties for Race, Gender and Disability)

14.1 VLUK will comply with the [Equality Act 2010](#) and will operate in compliance with the relevant policies.

14.2 At VLUK we try to ensure that everyone is treated fairly. All young people are given equal access to the study programme and its curriculum and all at VLUK are considered equal in the learning partnership. When young people have special needs we make arrangements to inform parents and design specific programmes.

14.3 Learners with disabilities must be able to take a full and active part in every lesson and every measure must be taken to ensure this.

15. Behaviour Policy

15.1 Good behaviour is essential at VLUK campuses and its education programmes, we have high expectations for this. Our Behaviour Policy details the rewards and sanctions available to staff. Although the emphasis is always on the positive there are also times when learners have to be disciplined in order to maintain the safety and security of all learners. For further details, refer to the Behaviour Policy.

15.2 Staff are discouraged from handling learners, but when they deem it is safest to do so, guidance has been given on safe methods of restraining a child so that they do not harm either themselves or others. For further guidance refer to the DfE's guidance on [Use of reasonable force in schools](#).

16. Anti-Bullying

16.1 VLUK agrees with The [Anti-Bullying Alliance](#) definition of [bullying](#) "bullying as the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online."

16.2 Bullying behaviour can be:

- Physical – pushing, poking, kicking, hitting, biting, pinching etc.
- Verbal - name calling, sarcasm, spreading rumours, threats, teasing, belittling.
- Emotional – isolating others, tormenting, hiding books, threatening gestures, ridicule, humiliation, intimidating, excluding, manipulation and coercion.
- Sexual harassment – unwanted physical contact, inappropriate touching, abusive comments, homophobic abuse, exposure to inappropriate films etc.
- Online /cyber – posting on social media, sharing photos, sending nasty text messages, social exclusion
- Indirect - Can include the exploitation of individuals.

16.3 VLUK's response to this is unequivocal. Adults must be informed immediately and action will take place. Young people are encouraged to 'TELL'. Although bullying at VLUK sites is rare, VLUK always acts swiftly with a process of investigation, communication and action. Bullying will not be tolerated.

17. Racial respect and understanding

17.1 In line with the Equality & Diversity Policy, VLUK asserts that pupils will be prepared for an ethnically diverse society. VLUK will work hard to promote racial equality and harmony by preventing and challenging racism. If anyone ever feels unjustly treated then VLUK welcomes and values a response. It is in working together that we will make VLUK even better.

17.2 Racism is tackled in tutorial sessions and aspects of the education programmes. Learners take part in discussions designed to raise awareness and address prejudices. From time to time visitors work with the learners.

17.3 VLUK operates in line with the government's [Prevent Agenda](#).

18. Record Keeping

18.1 We take account of guidance issued by the Department for Education to:

- Keep records of concerns about learners on CPOMS, even where there is no need to refer immediately.
- Ensure all records are kept securely. VLUK uses CPOMS to ensure security.
- Ensure that, when a learner who is subject to a Child Protection Plan leaves, their information is transferred to the new education establishment immediately and that the child's social worker is informed.

18.2 To meet and support this guidance, in 2021, VLUK introduced CPOMS as their safeguarding, pastoral and wellbeing solution

19. Photographing and videoing

19.1 We have taken a sensible, balanced approach to photographs and videoing on VLUK campuses, along with activities off site. VLUK will seek individual permission from parents/carers to photograph the individual learner; this is done upon enrolment to a VLUK study programme at the beginning of the academic year. For group activities outside the study programme, permission will be sought from all parents/carers. If an individual parent does not agree to the photographing or videoing of their child in the group activity this may prohibit photographing or videoing the group activity or it will be done sensitively without including the specific learner in the photographs or video. VLUK will operate within the above guidelines, which allows parents to photograph or video.

20. Social media & communication with learners

20.1 Occasionally it is necessary for professional academic reasons for staff to communicate with learners out of school.

Except where absolutely necessary, personal email addresses, home, mobile phone numbers, social media contact details, online aliases or text-based messaging aliases must not be given, asked for or used. Staff should communicate via their work email address.

20.2 A staff mobile phone number might be given to students for use during an educational visit; where possible, a VLUK-owned mobile phone should be used for this purpose.

Pastoral matters should not normally be dealt with by personal email or using personal phone contacts.

Only in the most exceptional circumstances, for instance, where there is well-founded concern for the unexplained whereabouts of a learner, should pastoral matters be dealt with by personal email, using personal phone contact or other personal communication tools.

20.3 In any event, records of all contacts must be kept on the student file (CPOMS) so that if it is necessary to use email or personal contact, the reason why will be specified in the written record.

It is very difficult to envisage circumstances under which individual contact is appropriate except through VLUK's official channels.

20.4 Social networking sites used for personal use, such as Facebook, Twitter, Instagram, WhatsApp, online games, digital communication/online services and other digital media, pose risks for all staff in terms of professional integrity and the welfare of students.

(a) Staff must not use these sites to contact or communicate with current learners, learners who have recently left, or ex-learners under the age of 18 or who are still in full time education.

Employees wishing to befriend learners who are over 18 and who have left an education establishment should do so with extreme caution and with the knowledge that any content posted on either ex-learners' or their own social network, may not only compromise their own position but that of any colleagues with whom they are also friends and who may not want their content to be seen by any ex-learner.

Unfortunately, some learners post information on their social networking sites which is inappropriate in language or visuals. To view such pages may alter your judgement of learners, to be known to be viewing them may alter a learner's view of you, and to comment to learners about what you have seen is likely to have an impact on your professional reputation, as well as possibly causing distress to learners concerned.

(b) Social media should not be used to address concerns regarding a learner's welfare, which should instead be raised with an appropriate member of the VLUK's SLT or safeguarding team.

21. Whistle-blowing or Allegations against a member of staff

21.1 Any member of staff or visitor to who has concerns about people working with learners and their suitability, whether they work in a paid or unpaid capacity has a responsibility to notify the relevant Assistant Curriculum Leader, Acting Head of Quality or Chief Operations Officer. The concern will then be raised, if required, with the Managing Directors. All concerns reported will be appropriately recorded and information treated according to the guidance in VLUK's staff handbook. [Low Level concerns awareness KSIE 2021](#)

22. Allegations against a learner

22.1 This will be dealt with via VLUK's Behaviour Policy. Where there is a referral to Children Services or subject to a Police investigation, incident logs of the situation will be completed and shared with appropriate staff, parents and other agencies involved.

23. Safeguarding Children in Specific Circumstances: Sexual violence and sexual harassment between children

23.1 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

It is very important that VLUK recognise that learners can, and sometimes do, abuse their peers in this way and that it is made clear to them that sexual violence and sexual harassment is not acceptable, will never be tolerated, will be taken seriously, and is not an inevitable part of growing up.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. It is likely to adversely affect their educational attainment.

Sexual violence and sexual harassment may overlap and can occur virtually on-line and off-line (both physical and verbal).

Sexual violence includes offences under the Sexual Offences Act 2003 (rape, assault by penetration and sexual assault).

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, and can be withdrawn at any time during sexual activity and each time activity occurs. VLUK staff (and especially designated safeguarding leads) understand consent and learners are taught about this explicitly in Tutorial lessons.

Sexual harassment is unwanted conduct of a sexual nature that 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. It can occur online and off-line.

Sexual harassment can include:

- sexual comments, such as telling sexual stories;
- making lewd comments;
- making sexual remarks about clothes and appearance;
- calling someone sexualised names; sexual "jokes" or taunting;
- deliberately brushing against someone;
- interfering with someone's clothes;
- Upskirting or,
- displaying pictures, photos or drawings of a sexual nature.

Online sexual harassment 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), sexual exploitation, coercion and threats, and upskirting.

23.2 VLUK will follow [Sexual Violence and Sexual Harassment guidance](#) (DfE, 2021) when responding to such issues alongside local interagency procedures and the Harmful Sexual Behaviours strategy. This includes responding to any reports in a learner-centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other learners. VLUK will respond to reports of sexual violence and sexual harassment on a case by case basis to consider/identify whether a criminal offence may have been committed and subsequently decide whether a report to the Multi Agency Safeguarding Hub is necessary. VLUK will also consider seeking specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

The 2021 version of 'Sexual violence and sexual harassment between children in schools and colleges' is now in force and replaces both the 2018 version, and the document published in July for information.

23.3 ['Report Abuse in Education' \(NSPCC helpline\)](#) was available from the 1st April 2021. This bespoke helpline is available to provide appropriate support and advice to victims of abuse, and concerned adults, including onward action such as contacting the police if they wish to. Young

people and adults can contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

23.4 If staff have a concern about one of their learners or a learner makes a report to them which relates to child-on-child sexual violence and/or sexual harassment, they are expected to report the concern through CPOMS, informing all Designated Safeguarding Leads

24. Safeguarding Children in Specific Circumstances: Child Sexual Exploitation and Child Criminal Exploitation (including County Lines)

24.1 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse which tend to occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance can be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

- The abuse can be perpetrated by individuals or groups, males or females, and children or adults.
- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

24.2 Child Sexual Exploitation (CSE)

A victim of CSE may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact: it can also occur through the use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any person under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex);
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both; and
- can occur without the child or young person's immediate knowledge (eg through others copying videos or images they have created and posted on social media).

The indicators of CCE can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

24.3 Child Criminal Exploitation (CCE)

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

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; and
- children who regularly miss school or education or do not take part in education.

24.4 County Lines

County Lines is a specific form of Child Criminal Exploitation. It is 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 (within the UK), using dedicated mobile phone lines or other form of "deal line". Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

24.5 Missing college is a potential indicator of involvement in county lines.

If a learner is suspected to be at risk of or involved in county lines, a safeguarding referral through CPOMS should be made, alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further advice is available in the Home Office document "Criminal exploitation of children and vulnerable adults: county lines"

25. Safeguarding Children in Specific Circumstances: Female Genital Mutilation (FGM)

25.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.

FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM, or help someone trying to do this.

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the school's safeguarding reporting procedures via CPOMS. A teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions.

25.2 If VLUK are concerned that a child/young person has experienced or is at risk of FGM, a Child Protection referral will be made to the Multi Agency Safeguarding Hub in accordance with

interagency procedures produced by that LSCB. There is a specific legal duty on teachers, if in the course of their work in the profession discovers that an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must report this to the police. See the annex to KCSIE 2021 part one

HBA - If any member of staff has a concern regarding a child who might be at risk of Honour based abuse they should speak to the DSL or deputy. As appropriate the DSL will activate local safeguarding procedures using existing national and local protocols for multi agency liaison with police and children's social care.

26. Definitions

Child: A child is any person under 18 years of age. (Children's Act, 1989)

Vulnerable adult: A vulnerable adult is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.' (Department of Health, 2000)

Child Protection: The protection of children from violence, exploitation, abuse and neglect

Duty of care: This is the duty which rests upon an individual to ensure that all reasonable steps are taken to ensure the safety of a student involved in any activity, or interaction for which that individual is responsible. Any person in charge of, or working with students in any capacity, is considered both legally and morally to owe them a duty of care.

Designated person: A member of staff who has responsibility for receiving and handling safeguarding and child protection concerns and has been trained to perform the role to an appropriate level.

Early help: Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged.

Safeguarding: Wider than Child Protection and is defined as: protecting from maltreatment preventing impairment of health or development ensuring that a person is growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children have the best outcomes to enable optimum life chances and to enter adulthood successfully.

Safeguarding is also about being proactive and putting measures in place in advance of any contact with students to ensure that students are going to be kept safe.

This list is not exhaustive and there may be other safeguarding issues that within the organisation;

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Emotional Abuse: Defined as persistent emotional ill treatment which is likely to cause serious harm to emotional development.

Neglect: The persistent failure to meet a person's basic physical and psychological needs, which is likely to result in serious impairment to health and development.

Physical abuse: This can best be described as actions such as hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating that cause harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual abuse: Forcing or enticing a child/young person or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening. It may involve penetrative or non-penetrative acts and includes involving children/young people or vulnerable adults in watching pornographic material or watching sexual acts.

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.

Human trafficking/modern slavery: Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (which comes from the Palermo Protocol).

Child Sexual Exploitation: This is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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

Radicalisation: The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism: The vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

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

Channel: Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for

organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation

Domestic abuse: Any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to; psychological, physical, sexual, financial and emotional.

Peer on Peer abuse: Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Child criminal exploitation: County lines: Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns

Up skirting: The practice typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals and buttocks. The Voyeurism Act outlaws 'upskirting' where the purpose is to gain sexual gratification or to cause humiliation, distress or alarm.

References

This policy complies with:

- [Keeping Children Safe in Education, September 2021](#)
- Equality and Diversity Act 2010
- Health and Safety Act
- Prevent Duty Guidance
- Education Act 1996
- Article 8 of the European Convention on Human Rights
- Section 91 of the Education and Inspections Act 2006