

OnTrak Statement of Safeguarding Assurance 2025-2026

*We can confirm that all adults at OnTrak Community Initiative are subjected to **enhanced DBS checks** and all other appropriate safer recruitment measures in line with KCSIE 2024. We also undertake **due diligence** in all our processes including recruitment, information sharing, Working Together, running of the charity and charitable businesses, community works and all other undertakings.*

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Key Contacts for Safeguarding and Child and vulnerable adult protection at OnTrak

Designated Safeguarding Lead (DSL)

| | | |
|---------------|----------------------------------------------------------------------------------------------|-------------------|
| Contact email | Adrian.woods@ontrakcommunity.org.uk | |
| Telephone | 07949 068833 / 01274 678272 | |
| Training | 08/2024 | Next Due: 08/2026 |

Deputy Designated Safeguarding Lead (DDSL)

| | | |
|---------------|----------------------------------------------------------------------------------------------|----------------------|
| Contact email | Adrian.woods@ontrakcommunity.org.uk | |
| Telephone | 01274 678272 | |
| Training | 30/07/2024 | Next Due: 30/07/2026 |

Safeguarding Officers

| | | |
|-----------------|---------------|--|
| Contact details | Adrian Woods | |
| | Allison Woods | |

Pastoral Staff

| | | |
|-----------------|-------------------------------------------------|----------------|
| Contact details | Allison Woods Kim Woods Viv Caines-Lamont | |
| Training | 07/2024 | Next Due: 2026 |

Designated Looked After Children Lead

| | | |
|-----------------|--------------|--|
| Contact details | Adrian Woods | |
|-----------------|--------------|--|

| | |
|-----------|-----------------------------|
| | |
| Telephone | 07949 068833 / 01274 678272 |

Nominated Trustee for Safeguarding

| | |
|-----------------|----------------------------|
| Contact details | Wayne Lockwood 07933631076 |
|-----------------|----------------------------|

Local Authority Designated Officer (LADO) – Ask for Duty LADO

| | |
|-----------|----------------------------------------------------------------|
| Telephone | 01274 435600 |
| Email | LADO@bradford.gov.uk |

Key Contacts for Safeguarding and Child and vulnerable adult protection at OnTrak

Local Authority Safeguarding contact numbers and emails

BRADFORD OFFICE

During Office Hours 8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday
 YP- Already assigned a social worker 01274 435600 for switchboard / 01274 433999 for support or raise concern / 01274 431010 Emergency Duty Team
 Adults – 01274 431077 MASH team or 01274 435400 for Emergency Duty
 Or call 111 /

Local Authority Safeguarding contact numbers and emails

HALIFAX OFFICE

During Office Hours Multi Agency Screening Team (MAST) 9am – 5pm
 Telephone 01422 393336 MASTadmin@calderdale.gov.uk
 Vulnerable Adult - 01422 393600 daytocare@calderdale.gov.uk

Out of Office Hours MAST for both YP and A 01422 228800 or call 111 / 999

If you are concerned about extremism, or if you think a child might be at risk of extremism, contact the helpline on **020**

7340 7264 or counter.extremism@education.gov.uk

SAFEGUARDING FLOW CHART

Staff, students, volunteers, visitors or external organisations can talk to Adrian Woods, or Allison Woods as Level 3/5 DSL’s and DSO’s for a safeguarding concern. The safeguarding concern will be considered and appropriate action taken.

Is the young person in immediate danger?

YES –
Call appropriate office and /or 111 / 999
NO –

Keep a record, if appropriate discuss with school / referral organisation for any concerns

they have shown that may match and show a pattern in line with Working Together. Should it become necessary, call appropriate number to discuss support / next steps.

Regular concerns will be recorded and acted upon and a referral made.

Purpose of Policy

OnTrak Community Initiative fully recognises its responsibilities for safeguarding children and vulnerable adults. Our students’ and staff welfare and safety are at the heart of our charity’s ethos and in everything we do.

In this policy, a 'child' means all children and young people below 18 years of age. In this policy, a "vulnerable adult" means all adults 18 years of age and above.

In accordance with relevant law and guidance, as set out below in the second section, this policy details our procedures for safeguarding and child and vulnerable adult protection.

It is applicable to the whole charity community. **Safeguarding and promoting the welfare of children is everyone's responsibility, whether they work or volunteer within the charity. Everyone has a role to play in child and vulnerable adult protection and safeguarding.**

All staff and volunteers will ensure that their approach and actions are child-centered and meet the "Every Child Matters" outcomes (safety, health and wellbeing, enjoy and achieve, economic improvement and positive contribution to society). This means that they'll consider, at all times, what is in the best interests of the child and that of the vulnerable adults within their care. Because of the day-to-day contact with students, charity staff and volunteers are well placed to observe signs of harm, abuse, neglect, peer on peer sexual violence and sexual harassment, victimization and/or exploitation. We support and actively support Working Together to safeguard children and assist with help and support to meet the needs of the child and vulnerable adult immediately as the problem emerges and promote early help as soon as a problem or issue is noticed. This includes whether the child and / or vulnerable adult is being mistreated at home and online.

OnTrak ensures that arrangements are in place to safeguard and promote the welfare of student by:

- Creating and maintaining an environment where all students feel secure, are encouraged to communicate, and are listened to
- Making sure that all students know which adults in the charity they can approach if they have any worries. We do this by having posters throughout the building so that contact details are always to hand
- Teaching students to keep themselves safe from all forms of abuse (including what they see, hear or experience) including: domestic abuse, online abuse, missinchild sexual exploitation, female genital mutilation, forced marriage, extremism, grooming, radicalisation, and peer on peer abuse including sexual violence and sexual harassment.
- Appointing senior members of staff from the charity leadership team to the roles of Designated and Deputy Safeguarding Leads.
- Providing effective, relevant and ongoing training and development for all staff and Trustees.
- Swiftly and effectively addressing any concerns and ensuring robust, timely referrals are made to other agencies. Ensuring effective links with relevant agencies in all matters regarding safeguarding and child and vulnerable adult protection.
- Reviewing and supporting students who are subject to child and vulnerable adult protection plans and contributing to the implementation of the plan.
- Keeping meticulous, written records of concerns about students, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately.
- Ensuring the suitability of all staff through safe recruitment practice and maintaining an accurate and up to date record.

- Making sure that all charity staff and volunteers understand their responsibilities with regard to safeguarding and child and vulnerable adult protection.
- Ensuring that parents and carers also have an understanding of the responsibility placed on the charity and its staff for safeguarding and child and vulnerable adult protection, and how they play a role in that responsibility through duty of care.
- Maintaining awareness of those students who have unexplainable / or persistently absent or missing from the charity, notifying the appropriate local authority in line with 'Children absent from education' protocols.
- Maintaining clear procedures in line with the latest guidance for reporting allegations against staff members (see Behaviour Policy and Statement of Behaviour Principles).

Furthermore, OnTrak recognises that:

- some students are at increased risk of abuse.
- Some students face additional barriers with respect to recognising or disclosing abuse.
- The charity is committed to recognising diversity and ensures anti-discriminatory practices. We ensure that **all students have the same protection** (see Equality, Diversity and Inclusion Policy).

We give special consideration to students who:

- Have special educational needs (SEN) or disabilities (further information is in section 9).
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Have English as an additional language.
- Are known to be living in difficult situations e.g. where there are issues at home, such as: substance abuse/misuse or domestic violence or where a family member has mental health needs.
- Are at risk due to either their own or a family member's mental health needs.
- Are within the care system and are looked after or previously looked after.

Safeguarding Children and Adults

OnTrak recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

Protecting children and vulnerable adults from maltreatment.

Preventing impairment of children's and vulnerable adults health and/or development.

Ensuring children are growing up in circumstances consistent with the provision of safe and effective care and that vulnerable adults are also provided with safe and effective care for their needs.

Undertaking that role so as to enable children to have optimum life chances, so they can enter adulthood successfully.

As part of meeting a child's needs, OnTrak :

- Recognises the importance of information sharing between professionals and other agencies as vital in identifying and tackling all forms of child abuse, including the prevention of child sexual exploitation, trafficking, female genital mutilation, forced marriage, and radicalisation.

- Will ensure any fears about sharing information will not be allowed to stand in the way of protecting the safety and welfare of any child or vulnerable adult.
- Will identify students who may be suffering from significant harm and make child and vulnerable adult protection referrals.
- Identify students who need extra help and make appropriate referrals, including to early help service, to prevent concerns escalating.

OnTrak also understands the importance of contextual safeguarding, i.e. that incidents or behaviours can be associated with factors outside the charity and can occur between children outside of charity. All staff should be considering the context within which such incidents and behaviours occur. This is known as contextual safeguarding and simply means that assessments should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Legislation and guidance

This policy for OnTrak is derived from a variety of legislative provisions and statutory guidance. In particular, it is based on good practice found in:

Keeping Children Safe in Education (2024) Working Together to Safeguard Children (2018) with updates in July 2022

Health and Care Act 2022 (currently under review at the time of this policy)

Domestic Abuse Act 2021

Data Protection Act 2018 (UK GDPR) and also includes the Data Protection and Digital Information Bill 2023 updates when in force

Education Act (2002 and 2011), Education (Careers Guidance in Schools) Act 2022 and Skills and Post-16 Education Act 2022.

The following legislation is also incorporated into this policy:

The Children Act 2020 and The Childrens and Families Act 2014, which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.

Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the **Serious Crime Act 2015**, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in **Statutory guidance on FGM**.

The Rehabilitation of Offenders Act 2015 outlines provisions for when people with criminal convictions can work with children.

'Regulated activity' in relation to children is found in Schedule 4 of the **Safeguarding Vulnerable Groups Act 2006**. Charity's 'PREVENT' duties under the **Counter-Terrorism and Security Act 2015** with respect to protecting people from the risk of radicalisation and extremism can be found in: **Statutory guidance on the Prevent duty (revised 2021)**.

Other statutory provisions relevant to child and vulnerable adult protection and safeguarding include:

The Education Act 2002 (section 175/157).

The Education (pupil information) (England) Regulations 2005.

Prevent Duty Guidance for England and Wales – September 2015.

The Sexual Offences Act, 2003, Home Office.

Teaching on-line safety in schools, DfE, 2023.

A full list of the guidance this policy has referred to, and which staff can refer to for further information, can be found in Appendix 3.

Related policies

Safeguarding covers more than the contribution made to child and vulnerable adult protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the charity policies and procedures referred to below:

Student Code of Conduct

Health and Safety and Work Risk Assessment

All Risk Assessments

Equality, Diversity, Inclusion and Cohesion Policy

Behaviour Policy and Statement of Behavioral Principles

Staff related policies

Responsibilities

OnTrak recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children. All staff working (including visiting staff) in OnTrak are required to:

- Observe and comply with the staff code of conduct.
- Attend all relevant training and development provided by the charity and be aware of all their responsibilities in line with Keeping Children Safe in Education 2024.
- Know how to deal with a disclosure. If a student discloses to a member of staff that they are being abused, the staff member should follow the guidance set out in appendix 1.
- Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy, in line with the Child and vulnerable adult protection Procedures and legal duty for reporting FGM as set out in this policy.
- Understand the charity's management policy and procedure and knows what to do in the event of an allegation made against someone working with children.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff should follow the Child and vulnerable adult protection Procedures with regards to peer on peer abuse as outlined in this policy. Further information can be found in appendix 2.
- Know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.

- Be aware of the early help process. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

The Trustees will:

- Assess the impact of this policy in keeping children safe.
- Contribute any local, contextual information that may support children's safety and welfare.
- Appoint a nominated governor to liaise with the Operations Manager and Designated Safeguarding Lead (DSL) on Safeguarding issues.
- Receive and consider regular reports from the Operations Manager about the effectiveness of safeguarding and child and vulnerable adult protection at the charity.
- Keep abreast of training to ensure that staff have the skills, knowledge and understanding necessary to keep all children safe.

All Trustees must read Keeping Children Safe in Education.

The Operations Manager will:

- Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored.
- Ensure that whilst the activities of the Designated Safeguarding Lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child and vulnerable adult protection, as set out below, remains with the DSL.
- Meet regularly with the DSL.
- Attend advanced training with an accredited provider.
- Ensure that all staff are vigilant to harm and abuse, are able to identify those students for whom there are child and vulnerable adult protection concerns, and can make appropriate referrals, including to early help services.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff should follow the Child and vulnerable adult protection Procedures with regards to peer on peer abuse as outlined in this policy. Further information can be found in appendix 2.
- Appoint a designated teacher to promote the educational achievement and welfare of students who are looked after and to ensure that this person has appropriate training.
- Communicate clearly to charity trustees, visitors, parents, and students so everyone understands the charity's safeguarding policy and procedures.
- Appoint a DSL and Deputy DSL giving consideration to the range of responsibilities the DSL undertakes, e.g. the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.
- Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff online areas and the website (along with this policy).
- Report to the Trustees regularly regarding the effectiveness of safeguarding and implementation of related policy.

- Ensure safe recruitment practice is followed when recruiting for posts, and ensure appropriate action is taken when an allegation is made against a member of staff.
- Ensure all appropriate checks are made in relation to all staff, volunteers, and visitors, including Section 128 checks for Charity Trustees.
- Ensure the charity offers a safe environment via a robust health and safety policy and procedure to meet the statutory responsibilities for the safety of students and staff at the charity.

The Designated Safeguarding Lead is responsible for:

- Ensuring that all cases of suspected or actual problems associated with child and vulnerable adult protection are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Operations Manager appraised.
- Ensuring the charity's safeguarding policy and practice is relevant and consistent with the most recent statutory guidance outlined in appendix 3 and 4.
- Being aware of the latest national and local guidance and requirements and keeping the Operations Manager and staff informed as appropriate.
- Attending accredited, enhanced training each year, as required to fulfil the role.
- Ensuring that appropriate training for staff is organised according to the agreed programme with the Operations Manager and renewed through ongoing professional development.
- Ensuring families are fully aware of the charity policies and procedures and kept informed and involved.
- Ensuring that effective communication and liaison takes place between the charity and the Local Authority, and any other relevant agencies, where there is a Safeguarding concern in relation to a student.
- Ensuring that all staff have an understanding of child abuse, neglect, and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities (SEND).
- Maintaining details of any looked after child's social worker and the name of the Virtual Charity Operations Manager (in the authority that looks after the child).
- Dealing with allegations of abuse in accordance with local and statutory procedures.
- Supporting the staff member in liaising with other agencies and setting up an interagency assessment as appropriate if early help is appropriate.
- Ensuring that adequate reporting and recording systems are in place.
- Liaising with the Trustees's nominated governor for Safeguarding.
- Ensuring relevant records are passed on appropriately when students transfer to other charities, or are being educated at alternative provision or off-site education.
- Being aware of children who are or who may be living in a private fostering arrangement. The Local Authority Private Fostering Officer is known to the charity and ensures liaison to support the welfare and safety of the child.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- The Designated and Deputy Safeguarding Lead will meet regularly with the Operations Manager to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work. Other key staff will be invited as appropriate. Safeguarding matters arising will be discussed routinely at each staff and/or Senior Leadership Team (SLT) meeting.

- Working with the relevant Virtual School representative to discuss how funding can be best used to support the progress of looked after children at the charity and meet the needs identified in the student's personal education plan.

Child and vulnerable adult protection Procedures

Staff at OnTrak will follow the necessary child and vulnerable adult protection procedures if an incident occurs (also refer to flow chart). They will be made aware that:

- Where a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately.
- Anyone can make a referral.
- Staff should not assume that somebody else will take action/share information that might be critical in keeping children safe.
- Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.
- The reporting of concerns relating to Female Genital Mutilation (FGM) is mandatory.
- The DSL or deputy DSL will always be available to discuss safeguarding concerns.
- When a member of staff at OnTrak suspects that any student may have been subject to abuse, or a student has suggested that abuse has taken place either to themselves or another student, the allegation must be reported immediately to the Designated Safeguarding Lead (DSL) or the Deputy DSL if the DSL is off site.

The DSL or Deputy DSL will:

- Ensure the allegation is acted on within the day.
- Ensure that the Operations Manager is informed of all allegations unless the allegation is against the Operations Manager, in which case the Chair of Trustees will be informed.
- Deal with the allegation in accordance with the agreed procedures.
- Be best placed to carry out a risk assessment of the issue and determine the escalation and timescales for dealing with the allegation.
- It is best practice to ensure that all colleagues who are involved in the allegation are informed of the outcome, so there is closure or continual vigilance as necessary.

Allegations of Abuse - appendix 1 provides guidance and detail about:

Each child abuse category.

Potential signs of abuse.

Specific procedures about how to deal with a disclosure.

Female Genital Mutilation (FGM)

The **FGM Mandatory Reporting Duty** is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires teaching staff to make a report to the police where, in the course of their professional duties, **they either:**

Are informed by a girl under 18 that an act of FGM has been carried out on her; or they

Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Allegations Against Members of Staff

All allegations of abuse made against a member of staff or volunteer in relation to a student must be brought to the attention of the Operations Manager and where appropriate the Designated Safeguarding Lead immediately. The Operations Manager will act in a coordinating role.

In the event the Operations Manager is the subject of the allegation, the DSL will report to the Chair of Trustees immediately to establish (as outlined in KCSIE 2024) 'the nature, content and context of the allegation' and agree the appropriate course of action. In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children's social care services.

If the allegation against a teacher or member of staff (including volunteers) meets any of the following criteria, the Operations Manager (or other lead person) must report it to the Local Authority Designated Officer (LADO) the same day:

- They have behaved in a way that has harmed a child, or may have harmed a child.
- They possibly committed a criminal offence against or related to a child.
- They've behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.
- For other allegations, the Operations Manager and DSL will decide if further enquiries are required prior to referral to the Local Authority Designated Officer.

Where the Operations Manager considers that a referral may be warranted under Child and vulnerable adult protection Procedures and an allegation appears to meet the criteria, the Operations Manager will inform the Local Authority's Designated Officer.

The Local Authority's Designated Officer (LADO) must be informed of all allegations that come to the charity's attention that meet the criteria, so that he/she can consult the police and social care colleagues as appropriate. The Local Authority Designated Officer should also be informed of any allegations that are made directly to the police or to children's social care. All alleged physical injuries must be investigated by the appropriate external agencies.

Whistleblowing

Where a staff member at OnTrak feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

If the charity has a dedicated Whistleblowing policy, detail what steps staff can take here:

General guidance on whistleblowing can be found via: [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-for-employees)

The [NSPCC dedicated helplines | NSPCC](https://www.nspcc.org.uk) is available as an alternative route for staff who do not feel able to raise concerns regarding child and vulnerable adult protection failures internally or have concerns about

the way a concern is being handled by their charity. Staff can call 0800 028 0285, which is available from 8:00am to 8:00pm, Monday to Friday, and email help@nspcc.org.uk.

Training for staff

OnTrak ensures all staff complete safeguarding and child and vulnerable adult protection training as part of their induction. The charity also has a commitment to updating training for all staff each year.

To achieve this:

- Time will be given to enable this commitment to be met.
- The Designated Safeguarding Lead (DSL) and Deputy DSL will receive relevant training every year.
- All staff and volunteers new to the charity will be given appropriate safeguarding training as part of their induction programme to the charity. Updates will feature regularly in all staff and SLT meetings, as appropriate.
- All charity staff and Trustees members will undertake the training at least every two years as organised by the DSL.
- Newly recruited staff will complete the online training as part of their induction and will receive charity-specific training, including being made aware of local risk factors for extremism.
- The DSL will attend Local Authority and other training courses as necessary and other appropriate inter-agency training every year.
- The DSL will attend Prevent training (WRAP) as provided by the Home Office and Local Authority.
- The Operations Manager will attend advanced training with a designated provider.
- The Senior Leadership team, Pastoral Leaders, and the Trustees will attend training with a designated provider.

Suitability of staff and safe recruitment practices

The charity recognises that safe recruitment practices are an essential part of creating a safe environment for children, young people and vulnerable adults. Consequently, we will ensure due diligence that staff and volunteers working at the charity are suitable to do so and therefore do not pose any kind of risk to our students.

Appropriate members of SLT, Trustees, and other relevant staff are required to complete Safer Recruitment Training in order to ensure that one panel member on every selection panel is trained in 'Safer Recruitment.'

Prevent duty - Safeguarding students who are vulnerable to extremism.

The charity's prevent strategy OnTrak follows the statutory guidance on the charity's responsibility to fulfil our Prevent Duty including relevant staff training. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme

views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

For OnTrak's full statement on PREVENT duty, refer to the Prevent Duty Statement.

Safeguarding students who are vulnerable to exploitation, child sexual exploitation, honour based violence (forced marriage and female genital mutilation), and at risk from or involved with violent crime and peer-on-peer abuse


All staff at OnTrak will be provided with an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) put children in danger.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when 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:

in exchange for something the victim needs or wants, and/or

for the financial advantage or increased status of the perpetrator or facilitator.

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

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity.
- Inappropriate sexual or sexualised behaviour.
- Sexually risky behaviour, 'swapping' sex.
- Repeat sexually transmitted infections.
- In girls, repeat pregnancy, abortions, and miscarriage.
- Receiving unexplained gifts or gifts from unknown sources.
- Having multiple mobile phones and worrying about losing contact via mobile.
- Having unaffordable new things (clothes, a mobile phone, etc.) or expensive habits (alcohol, drugs, etc.).
- Changes in the way they dress.
- Going to hotels or other unusual locations to meet friends.
- Seen at known places of concern (e.g. brothels).
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.

- Having older boyfriends or girlfriends.
- Contact with known perpetrators.
- Involved in abusive relationships, intimidated, and fearful of certain people or situations.
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with charity, opting out of education altogether.
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, etc.).
- Mood swings, volatile behaviour, emotional distress.
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

Honour-based violence: Forced Marriage (FM)

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence.

Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle-East and African countries.

A signal of FM is the removal of the students from charity and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings.

Any member of staff at OnTrak with any concerns should report this immediately to the DSL, who should raise the concern with the Local Police Safeguarding Unit by email or phone. Never attempt to intervene directly as a charity or through a third party. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child and vulnerable adult protection responsibilities.

Honour-based violence: Female Genital Mutilation (FGM)

There is a specific legal duty on teachers regarding FGM. If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff at OnTrak will recognise this responsibility.

The 'One Chance' rule.

As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the charity takes action without delay.

What is FGM?

Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Why is it carried out?

It is often based on a belief that FGM:

- Brings status/respect to the girl – social acceptance for marriage.
- Preserves a girl's virginity.
- Is part of being a woman/rite of passage.
- Upholds family honour.
- Cleanses and purifies the girl.
- Gives a sense of belonging to the community.
- Fulfils a religious requirement.
- Perpetuates a custom/tradition.
- Helps girls be clean/hygienic.
- Is cosmetically desirable.
- Is mistakenly believed to make childbirth easier.

FGM IS A CRIMINAL OFFENCE. There is no justification for this procedure.

All staff at OnTrak will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM.

All teachers and charity staff have a mandatory responsibility to report FGM if they discover it (through disclosure not physical examination) to the police and informing the DSL immediately who will support (the Deputy DSL will take on this responsibility if the DSL is not available).

Circumstances and occurrences that may point to FGM happening include:

- The child talking about getting ready for a special ceremony.
- The child and their family taking a long trip abroad.
- The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia, and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- The child talking about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from charity and other activities.

- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infection.
- Disclosure.

Further guidance and information are available from:

NSPCC FGM Helpline

Contact days and times: **24 hours**

Tel: **0800 028 3550**

Email: **fgmhelp@nspcc.org.uk**

Serious Violent Crime

All staff at OnTrak are will be made aware of the indicators that may signal children are at risk from, or are involved with, serious violent crime. Signs may include:

- Increased absence.
- Change in friendships.
- New relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm.
- Significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions. These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Staff should make themselves aware of issues surrounding **County and Local Lines**. Some signs to look out for include:

- An increase in visitors and cars to a house or flat.
- New faces appearing at the house or flat.
- New and regularly changing residents (e.g. different accents compared to local accent).
- Change in resident's mood and/or demeanor (e.g. secretive/ withdrawn/ aggressive/ emotional).
- Substance misuse and/or drug paraphernalia.

- Changes in the way young people you might know dress.
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc).
- Residents or young people you know going missing, potentially for long periods of time.
- Young people seen in different cars/taxis driven by unknown adults.
- Young people seeming unfamiliar with your community or where they are.
- Truancy, exclusion, and disengagement from charity.
- An increase in anti-social behaviour in the community.
- Unexplained injuries.

All staff should be aware of the associated risks and understand the measures in place to manage these.

Child-on-Child abuse

All staff at OnTrak will be made aware that children can abuse other children (referred to as peer-on-peer). Staff will also call out and tackle any behaviours that may indicate child-on-child abuse. Students will be taught as part of their PSHE and daily attendance in accordance with DfE and OnTrak's strict guidelines on creating a safe environment. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes, and on-line sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.
- Posting inappropriate content on social media or other forums.

Sexting

Your responsibilities when responding to an incident:

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download, or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).

- Share information about the incident with other members of staff, the student(s) it involves, or their, or other, parents and/ or carers.
- Say or do anything to blame or shame any young people involved.
- You should explain that you need to report the incident to the appropriate authorities (depending on the severity of the content the police may need to be involved), and reassure the student(s) that they will receive support and help from the DSL.

Procedure for students identified as being 'at risk' or vulnerable to exploitation, child sexual exploitation; honour-based violence (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and peer-on-peer abuse

Where risk factors are present but there is no evidence of a particular risk, the DSL/SPOC at OnTrak will advise staff on preventative work that can be done within the charity to engage the student into mainstream activities and social groups.

The DSL may well be the person who talks to the student's family where appropriate, sharing the charity's concern about the student's vulnerability and how the family and charity can work together to reduce the risk.

In this situation, depending on the level of concern and agreement with the parent and the student (as far as possible):

- The DSL/SPOC can decide to notify the Multi-Agency Safeguarding Hub (MASH) of the decision so that a strategic overview can be maintained and any themes or common factors can be recognised;
- The charity will review the situation after taking appropriate action to address the concerns.
- The DSL/SPOC will also offer and seek advice about undertaking an early help assessment and/or making a referral to Social Services or involving the local Safeguarding Children's Board. If the concerns about the student are significant and meet the additional needs/complex need criteria, he/she will be referred to the MASH. This includes concerns about a student who is affected by the behaviour of a parent or other adult in their household.

Children Missing in Education

All students, regardless of their circumstances or background, are entitled to full-time education that is suitable to their age, ability, aptitude, and any special educational needs and disabilities.

The charity operates a strong attendance tracking system that is overseen by the leadership team. The tracking and use of effective attendance management strategies enables the charity to ensure each day that every child is accounted for.

The charity takes a range of actions to tackle Persistent Absentees and completes official reports on children who are persistently absent from charity.

The charity will only authorise leave of absence in exceptional circumstances. The Operations Manager, or Deputy in their absence, will determine the length of time that the child can be away from the charity.

The charity recognises that some children seeking leave of absence are vulnerable to risk of abuse, neglect, or travelling to conflict zones, or at risk of FGM or forced marriage.

All staff are trained to look out for these triggers and the charity works in partnership with the Local Authority to ensure localised risks are particularly taken note of and shared with all staff. Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis.

Where this is identified, staff should alert the DSL and Operations Manager. The DSL will, as soon as a concern is established, alert the school and/or referring organization and the Local Authority.

As a matter of course: student absence must be followed up on a daily basis – this must be a priority. Unless circumstances indicate that a student is at risk and immediate action is necessary, the Local Authority will be informed of every student who has a continuous period of unexplained absence of three days or more.

The admissions register at the charity is kept up to date in all circumstances.

No student will be removed from a charity roll until all safeguarding checks have been completed or the whereabouts of a student have been established.

Online Safety

All staff will be made aware of the contents of this policy with regards to online safety.

OnTrak's online safety protocols and use of technology, including that of confiscation of devices, blocking controls for all inappropriate online content, no access to the wi-fi password and protocols for reporting to appropriate authorities if the content and/or use thereof is considered at risk, is in conjunction with the DfE guidance:

Teaching on-line safety in schools, 2023.

See OnTrak's Online Safety Statement for full details.

Opportunities to teach safeguarding: Statutory PSHE

OnTrak will ensure that children are taught about safeguarding. This may include covering relevant topics through learning in general but is covered particularly in Relationships Education and Relationships and Sex Education.

This will be delivered through PSHE lessons. The subject of Relationships and Sex education is mandatory and is provided by a vetted external training provider.

Looked after children

All staff in OnTrak will have an awareness of issues around safeguarding looked after children. The leadership team will ensure due diligence that staff have the skills, knowledge, and understanding necessary to keep looked after children safe.

Staff will be aware of the legal status of a looked after child's care arrangements. In particular, they will ensure that appropriate staff have the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead will have details of the student's social worker and the name of the virtual charity Operations Manager in the authority that looks after the student.

The Operations Manager will appoint a Designated Teacher to promote the educational achievement of students who are looked after and to ensure that this person has appropriate training.

For further information, see OnTrak's Designated Teacher policy.

Liaison with the Virtual School

Students may attend OnTrak through the referral organization the Virtual School. The Virtual School Head or representative will continue to receive pupil premium plus additional funding based on the latest published numbers of children looked after in the authority.

The charity's Designated Teacher for looked after children will work with the virtual school representative to monitor the child's welfare and discuss how funding can be best used to support the progress of the child and meet the needs identified in the student's personal education plan.

Children with special educational needs and disabilities

OnTrak understands the importance of everyone being aware about the additional vulnerabilities of children with special educational needs and disabilities (SEND) in respect of safeguarding and child and vulnerable adult protection. The registration forms and the EHCP's should inform staff of these vulnerabilities so that staff are better informed and placed to support that child / vulnerable adult with any safeguarding issues.

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges.

Furthermore, students with special educational needs and disabilities can be more susceptible to peer on peer group isolation than other children and can be disproportionately impacted by bullying – without outwardly showing any signs.

OnTrak therefore supports staff (and other students through promoting respect – see our full statements in the

Equality, Diversity, Inclusion and Cohesion Policy) through training and development to recognise and understand that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. For example, staff assuming that indicators of possible abuse such as behaviour, mood, and injury relate to the child's disability without further exploration.

Children who harm other children (Child on Child abuse)

OnTrak recognises that children are capable of abusing their peers. Examples of this may include when children are violent or cause danger towards other children.

It can also be when children sexually abuse or sexually harass other children – please refer to APPENDIX 2.

Where a student's behaviour causes significant harm to other students, staff should follow the child and vulnerable adult protection procedures for the charity. The DSL will refer the child in line with the local area safeguarding protocol for these children.

OnTrak's Behaviour Policy and Statement of Principles states how OnTrak stands on sanctioning such behaviours.

Confidentiality and Record Keeping

Staff at OnTrak have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL.

If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that he/she has a responsibility to refer the matter to the DSL.

Accurate, signed, and dated written notes must be kept of all incidents or Child and vulnerable adult protection concerns relating to individual students. If a teacher or any other staff have a child and vulnerable adult protection concern, they should inform the DSL or Deputy DSL as soon as possible. These will be kept on the student's Child and vulnerable adult protection file.

Child and vulnerable adult protection records must be retained securely. Arrangement for Child and vulnerable adult protection documentations must comply with the charity's Data Protection Policy together with data protection law and regulation applicable at the time. The DSL will ensure that all Child

and vulnerable adult protection records are held separately from other student records. Child and vulnerable adult protection files and documents will be stored securely, by encryption and/or password protecting electronic files or ensuring that paper records are in a locked cabinet with restricted access. Information from child and vulnerable adult protection files will only be shared with relevant staff when it is necessary to do so and in a manner that is consistent with data protection law.

If the charity receives a request for direct access to, or copies of, charity documentation held on a Child and vulnerable adult protection file, the Operations Manager and DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy under UK GDPR. It may be that further legal advice is sought.

In the event of a student who is being dealt with under the charity's child and vulnerable adult protection procedures transferring to another charity, the charity will:

- Find out the name of the receiving charity (and, where appropriate, the Local Authority).
- Contact the relevant member of staff at that charity to discuss the transfer.
- Securely send all information relating to the student to the receiving charity (and, where relevant, the Local Authority).
- Check with the receiving charity that the student has actually arrived there on the expected day (and inform all relevant agencies of the transfer).

Any external individual or organisation contracted by the charity to work with charity students must report any child and vulnerable adult protection incidents or disclosures from students to the Operations Manager or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the charity, be required to work in accordance with the charity's child and vulnerable adult protection and safeguarding policy. The charity has in place data sharing agreements and complies with all relevant data sharing protocols.

Working with parents / individuals with parental responsibility

OnTrak recognises the importance of working, where appropriate, in partnership with parents and carers to ensure the welfare and safety of our students.

The charity will therefore:

- Make parents aware of the charity's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on, where necessary, by making all policies available on the website and on request.
- Work with parents to support the needs of their child.
- Consider the safety of the student and, should a concern arise, the Designated Safeguarding Lead (DSL) has the responsibility to seek advice prior to contacting parents.
- Aim to help parents understand that the charity has a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the interests of the student as appropriate.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.

- Provide advice and signpost parents and carers to other services where students need extra support.

Health and Safety

The Operations Manager of OnTrak will ensure that there is a robust, up to date Health and Safety Policy and Procedure to meet the statutory responsibility for the safety of students and staff at the charity. The Operations Manager will identify and manage health and safety through the use of risk assessments, which are carried out:

- On an annual basis for the charity learning spaces and environment in and outdoors.
- For all charity trips and educational visits.
- For students travelling between locations during the charity day.
- For all work-based learning on work experience placements.
- When a student returns following an exclusion due to risky or violent behaviour.
- When there are any changes to the premises or practices.
- Following a serious accident in relation to staff and/or students.
- When there is a high-level risk associated with contact with parents.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

Visitors and contractors will be expected to:

- Report to the charity reception on arrival.
- Provide proof of identity.
- Wear a name badge at all times.
- Receive suitable supervision by charity staff when on site.
- Be made aware of the arrangements for safeguarding and health and safety.
- Comply with the relevant vetting checks specified through the charity's recruitment process.

Equal Opportunities

OnTrak and Trustees must take into account the Equality, Diversity, Inclusion and Cohesion Policy when discharging their duties under this policy.

OFSTED Inspections

OnTrak is not currently registered with Ofsted but as a training provider. However, OFSTED's inspections of OnTrak will be carried out under OFSTED's Education Framework through partner Ofsted inspections and the results published. OnTrak has received regular inspections and have received Good and Outstandings.

Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective. In addition, Ofsted publishes specific guidance to inspectors.

You can find guidance documents at the following link:

[https://www.gov.uk/government/publications/inspecting- safeguarding-in-early-years-education-and-skills](https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills)

Monitoring and Review of this Policy

The Designated Safeguarding Lead (DSL) at OnTrak will monitor the working of this policy and will report as required to the Operations Manager and the nominated governor. It will be reviewed annually.

Appendix 1 - Staff Guidance

Procedures in respect of Child Abuse

Child abuse exists where children have been physically or emotionally abused or severely neglected. Abuse of children is likely to be noticed by the charity staff and Health Workers or Education Welfare Officers. It is essential, therefore, that all those whose work brings them into contact with children and their families

know the signs of child abuse and are aware of the procedures that they must follow to safeguard the child.

Part one of Keeping Children Safe in Education 2023 should be referred to for a list of those children who may be in need of safeguarding support.

OnTrak has the role of recognising and responding to potential indicators of abuse, neglect and exploitation. All other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential by the charity.

In the event of an actual or suspected case of child abuse by adults, parents, teachers, or any other adult, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as soon as possible. The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified and the appropriate agency involved.

The Designated Safeguarding Lead (DSL) or Designated Safeguarding Officer (DSO) will attend any reviews called by the Local Authority, and may call on appropriate members of staff for reports. It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation. Staff should not assume that somebody else will take action and must share information which might be critical in keeping children safe.

Staff leading charity off-site visits, particularly residential ones, should provide a list of the students taking part to the Designated Safeguarding Lead (DSL), to ensure that they are made aware of all essential information relating to the students in their care. A confidential register will be maintained of all those students known to be at risk. Names will be entered on the register if it is confirmed by the Local Authority that the child is actually at risk.

Guidance for all staff on dealing with disclosure / suspected abuse / neglect / sexual harassment, sexual assault, violence, honour based violence (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and peer-on-peer abuse.

Dealing with disclosures of abuse:

- Always listen carefully and quietly. Do not press for any evidence at all.
- Remain calm and reassuring. Do not dismiss the disclosure and do not show distress or concern.
- Do not refute the allegation.
- Show that you care through open and reassuring facial expressions and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- Ensure you take a written verbatim account of the child's disclosure.
- Staff should be aware that written accounts could become part of a statutory assessment or criminal investigation.
- Where there is an online element, the key consideration is for staff not to view or forward illegal images of a child. Where viewing images is unavoidable, the link below provides advice on how to respond:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

At this point, staff should take the following steps:

- Explain to the student that the disclosure must be reported – emphasise your trust in them.
- Do not promise to keep the allegation secret or that ‘everything will be alright.’
- Reassure the student by telling them that they have done the right thing in telling you. Do not offer physical reassurance.
- Do not admonish in any way e.g. ‘I wish you had told me sooner.’
- Inform the DSL initially verbally.

Under no circumstances discuss the matter with any other person. If the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a ‘need to know’ basis at the discretion of the DSL. If the child agrees, and it is appropriate, take them with you to the DSL.

With the DSL, prepare a detailed report itemising:

- The information revealed by the student. It should not contain any opinion whatsoever.
- Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the charity.
- Date and sign any written record of events and action taken and keep confidential and secure.

You must keep, in absolute confidence, a copy of the report, as will the DSL.

The DSL keeps Child and vulnerable adult protection records centrally and securely and are not kept in the child’s file. **All staff are under a duty to report all suspicions of abuse to the DSL. The DSL is responsible for passing on these concerns to Children’s Services. Accurate records are essential in the event of further investigations.**

If you see or hear something that is concerning:

- Don’t ignore it or assume that it is someone else’s responsibility to report it.
- Upload all information to the charity’s safeguarding systems and seek advice immediately from your DSL.
[insert your charity’s safeguarding systems e.g. CPOMS or other relevant systems your charity uses].
- Don’t feel silly – if it worries you, someone else needs to know.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk, inform the appropriate Pastoral Leader or safeguarding officer in person and follow up with a one-line email notifying the DSL that there is a safeguarding concern.
- If it is related to a child being at risk, see the DSL or Deputy DSL immediately and definitely before the child goes home that day where possible.
- All staff may raise concerns directly with Children’s Services if they feel an incident is not being dealt with appropriately or they are unable to locate relevant staff.
- Concerns about adults in the charity should be made directly to the Operations Manager.

Child and vulnerable adult protection Procedures – Points of action

If anyone discovers or suspects child abuse/peer on peer sexual violence or sexual harassment, they must inform the DSL. The DSL will, in the appropriate manner and according to procedures, assess the situation.

The DSL will, if appropriate, take the following steps:

- Where there is a report of peer on peer sexual violence, the DSL will make an immediate risk and needs assessment in accordance with part five of Keeping Children Safe in Education 2023. Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case by case basis
- Where it is clear that a Child and vulnerable adult protection Referral (significant harm) is needed, they will contact Social Services without delay.
- Where the DSL is not sure whether it is a Child and vulnerable adult protection issue, or where the DSL needs to check the Child and vulnerable adult protection register, they may seek advice from the MASH (Multi Agency Safeguarding Board).
- They will follow locally agreed protocols which can be found on the Local Authority Safeguarding Children's Board website.

The DSL or a delegated child and vulnerable adult protection officer **recognise the importance of multi-agency working and will ensure that staff are able to attend all relevant meetings, case conferences, core groups, and strategy meetings.** We will provide relevant training and support for staff required to attend any meetings.

Appendix 2 - Information on child abuse and categories of abuse

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

Abuse is defined as a form of maltreatment of a child and/or vulnerable adult where they may see, hear or experience abuse. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children (peer on peer abuse).

In a situation where abuse is alleged to have been carried out by another peer, the child and vulnerable adult protection procedures outlined in this policy should be adhered to for both the victim and the alleged abuser. That is, it should be considered a child care and protection issue for both children.

All abusers must be held accountable for their behaviour and work must be done to ensure that abusers take responsibility for their behaviour and acknowledge that the behaviour is unacceptable. If there is any conflict of interest between the welfare of the alleged abuser and the victim, the victim's welfare is of paramount importance.

Abusive behaviour that is perpetrated by peers must be taken seriously. It is known that some adult abusers begin abusing during childhood and adolescence, that significant numbers will have suffered abuse themselves, and that the abuse is likely to become progressively more serious. Early referral and intervention are therefore essential in line with paragraph 2 of this policy.

Peer on peer abuse can manifest itself in many ways.

All staff should be aware that children can abuse other children (referred to as peer on peer). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying and other online and communication platforms).
- Physical abuse such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.

- Sexual harassment, such as sexual comments, remarks, jokes, and on-line sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.

Please refer to the Department for Education advice in [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/651162/Keeping_children_safe_in_education_2023.pdf) It could be through 'sexting' using online communications, text, or image messaging. Please refer to the online safety policy for further information. The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at [CEOP Safety Centre](https://www.ceop.gov.uk/)

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and persistent adverse effects on the child's development. It may involve conveying to children 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 opportunity 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 the child's developmental capability, as well as overprotection and limitation of exploring or learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing children to frequently feel frightened or in danger, exploitation, or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may include 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 (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children.

Neglect

Neglect is the persistent failure to meet a child's basic or physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff and volunteers should be concerned about a child if he/she presents indicators of possible significant harm. Training will be provided to all staff on the 'signs of abuse.'

Signs of Abuse in Children

The following non-specific, broad signs may indicate something is wrong:

- Significant change in behaviour.
- Extreme anger or sadness.
- Aggressive and attention-seeking behaviour.
- Suspicious bruises with unsatisfactory explanations.
- Lack of self-esteem.
- Self-injury.
- Depression.
- Inappropriate sexual behaviour.
- Child Sexual Exploitation.

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but they:

- Must be regarded as indicators of the possibility of significant harm.
- Justify the need for careful assessment and discussion with the Designated Safeguarding Lead.
- May require consultation with and / or referral to Children's Services.
- The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/carers.
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child, frequently complain about/to the child, and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.

- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.
- Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments.
- Reluctance to give information or mention previous injuries.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Two simultaneous bruised eyes (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the Operations Manager or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used e.g. belt marks, handprints, or a hairbrush.
- Bruising or tears around, or behind, the earlobe(s) indicating injury by pulling or twisting.
- Bruising around the face.
- Bruising on the arms, buttocks, and thighs may be an indicator of sexual abuse.

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation.

Fractures

Fractures may cause pain, swelling, and discolouration over a bone or joint. There are grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain, or loss of movement.

Scars

A large number of scars, scars of different sizes or ages, and scars on different parts of the body may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also suggest the presence of other kinds of abuse.

The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate, or not appropriate attachment.
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Scapegoating within the family, such as a parent blaming the child for something bad that happened to them (e.g. losing a job).
- Frozen watchfulness.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a “loner” – difficulty relating to others.
- The indicators of emotional abuse are often also associated with other forms of abuse.

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/ family. Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play, or conversation, inappropriate to the child's age.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorder), self-mutilation, and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area.
- Blood on underclothes.
- Pregnancy in a younger girl where the identity of the father is not disclosed.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen, and thighs, and sexually transmitted disease.

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance, and exploitation.

This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality, and sexual abuse against adults, peers, or children. This may also include online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- Non-consensual sharing of sexual images and videos.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation • Coercion and threats.
- Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate sexual behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, or aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of an incident and the presence of exploitation, the following factors should be given consideration:

Equality – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies.

Consent – consider whether an incident appeared consensual or non-consensual, keeping in mind that consent means willing agreement. This requires consideration of all the following:

Understanding that is based on age, maturity, development level, functioning, and experience.

Knowledge of society’s standards for what is being proposed – awareness of potential consequences and alternatives. Assumption that agreements or disagreements will be respected equally.

Voluntary decision.

Mental competence.

Coercion – a young perpetrator who abuses may use techniques like bribing, manipulation, and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting.

Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene, and medical care.

- A child seen to be listless, apathetic, and unresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from home environment.
- Child frequently absent from charity.
- Child left with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

Appendix 3 - The Charity's Statutory Duty and Guidance Documents

This policy sets out how OnTrak will meet its statutory duty to safeguard and promote the welfare of our students. It has been developed in accordance with the law and guidance found at [Keeping children safe in education 2024](#) that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:

Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges
Working Together to Safeguard Children
Multi-agency Statutory Guidance on Female Genital Mutilation
Teaching On-line Safety in Schools
Information about mandatory reporting of female genital mutilation
Protecting Children from Radicalisation: the prevent duty
Prevent Duty Guidance: England and Wales
Inspecting safeguarding in maintained schools and academies
Inspecting safeguarding in safeguarding in early years, education and skills settings
Competence Still Matters: Safeguarding training for all employees and volunteers
Preventing Youth Violence and Gang Involvement
Safeguarding in Schools: Best Practice
Criminal exploitation of children and vulnerable adults: county lines
Sexual Offences Act
The Children Act 1989 and 2004 and The Education Act 2002 and 2011
Mental Health and Behaviour in Schools: Departmental Advice
Multi-agency statutory guidance on female genital mutilation
Sexting in Schools, Aug 2021, UK Council for Internet Safety
Learning together to be safe - a toolkit to help schools contribute to the prevention of violent extremism 'The Prevent Strategy: A Guide for Local Partners in England'

If anyone wishes to seek further information or guidance, they can refer to the above documents.

Appendix 4 – Staff Signatures of training

Keeping Children Safe In Education (KCSIE) 2024-2025.