

## ***Safeguarding and Prevent Policy***

### Introduction

**Star Greenwich Education** is committed to safeguarding and promoting the welfare of candidates/apprentices and expects all team members, volunteers to share this commitment.

All **Star Greenwich Education** team members, associates, volunteers, and contractors must therefore comply with the procedures set out in this document.

**Star Greenwich Education's** Safeguarding Policy and guidance applies to all candidates/apprentices who are children (under the age of 18) or vulnerable adults. The key objectives of the policy and guidance are to:

- Promote a safe environment for all our candidates/apprentices to learn and achieve.
- Actively promote the welfare of candidates/apprentices.
- Identify any candidates/apprentices who may be experiencing abuse or harm whilst in education and training, at work, at home or in relationships and take appropriate action to ensure their safety (Child and Adult Protection).

This guidance is based upon the following legislation and guidance

- Children Act 1989
- Children Act 2004
- Section 175 Education Act 2002
- Working Together to Safeguard Children 2015 (DCSF)
- Counter Terrorism & Security Act 2015
- Counter Extremism Strategy October 2015
- Serious Crime Act, Mandatory Reporting of Female Genital Mutilation, October 2015
- Every Child Matters Programme (Department of Children Schools and Families).
- Safeguarding Children and Safer Recruitment in Education 2010 (DCSF)
- No Secrets – Guidance DOH 2000
- Safeguarding Vulnerable Groups Act 2006
- Safer practice, safer learning: A whole-organisation approach to safeguarding vulnerable adults for the learning and skills sector. NIACE for the Department for Education and Skills 2007
- The Multi Agency Adult Safeguarding Policy, Practice and Procedures. (Luton, Bedford Borough and Central Bedfordshire)
- Handling Cases of Forced Marriage: Multi-agency practice guidelines. HM Government 2009.

### Duty of Care: Responsibility & Accountability

All **Star Greenwich Education** team members, associates and volunteers have a duty of care to ensure that any candidate/apprentice who may be experiencing abuse or harm in education and training, at work, at home or in relationships has been referred to our designated safeguarding team member.

The **Star Greenwich Education's** Senior Leadership Team, ensures that it adheres to all duties in relation to Safeguarding; however, the key designated safeguarding team members included the following:

The Senior Nominated Person is a senior member of **Star Greenwich Education's** Leadership Team who ensures that measures are put in place where necessary.

### Senior Nominated Person responsibilities are:

- To ensure that **Star Greenwich Education** carries out its duties in relation to Safeguarding Children, Young People and Adults in the company.
- To act as the Designated Safeguarding Lead (DSL)
- To report to the Senior Leadership Team as required.
- To convene the Safeguarding Group quarterly.

- Undertake and deliver training in relation to Safeguarding.
- Provide an annual report to the Senior Leadership Team setting out how the company has discharged its duties.
- To ensure that **Star Greenwich Education** liaises with Bedford Borough Council Safeguarding team other external agencies as appropriate and necessary.
- To ensure that all team members and volunteers receive awareness training in safeguarding issues and are aware of **Star Greenwich Education** procedures.
- To appropriately refer children who may be at risk of significant harm to Children's Initial Contact Point in the Children's Social Care section of Bedford Council's Children and Young Person's Services Department. Where the home address for a candidate/apprentice is in another local authority area the referral will need to be made to the local Children's Social Care or (Social Care) in the area where the candidate/apprentice lives.
- To refer concerns that a Vulnerable Adult is or may be suffering serious harm to the Bedford Borough Council Adult Protection team where this fits with the multi-agency Adult Protection Procedures.
- To consult Bedford Borough Council Safeguarding team regarding complex cases and to check if Early Help Assessment has been undertaken.
- To be available to provide advice and support to team members on issues relating to Child, Young Person and Vulnerable Adult Protection.
- To support the candidate/apprentice, ensuring they are central to the process and kept informed throughout.
- To respond to individual cases, including attending multi-disciplinary conferences as appropriate.
- To maintain proper records of referrals, complaint, or concern (even where that concern does not lead to a referral)
- To ensure that the recording is securely stored and archived.
- To give feedback to the member of team members who made the referral where appropriate, taking information sharing and confidentiality issues into account.
- Where there are concerns about a candidate/apprentice but not sufficient to make a referral a recommendation may be made that the candidate/apprentice be offered an EHA (Early Help Assessment Framework). The Senior Nominated Person for Safeguarding will act as the lead professional in COMPANY XXXX.
- To monitor and assess candidates/apprentices wishing to enrol who declare a criminal conviction.

#### Designated Safeguarding and Wellbeing Coordinators

**Star Greenwich Education** has one named Safeguarding and Wellbeing Coordinator, who is line -managed by the DSL and advises the team members, as appropriate.

#### Their Responsibilities are:

- To report to the named Designated Safeguarding Lead (DSL).
- To appropriately refer children who may be at risk of significant harm to Children's Initial Contact Point in the Children's Social Care section of Bedford Council's Children and Young Person's Services Department. Where the home address for a candidate/apprentice is in another local authority area the referral will need to be made to the local Children's Social Care or (Social Care) in the area where the candidate/apprentice lives.
- To refer concerns that a Vulnerable Adult is or may be suffering serious harm to the Bedford Borough Council Adult Protection team where this fits with the multi-agency Adult Protection Procedures.
- To consult Bedford Borough Council Safeguarding team regarding complex cases and to check if Early Help Assessment has been undertaken.

- To be available to provide advice and support to team members on issues relating to Child, Young Person and Vulnerable Adult Protection.
- To support the candidate/apprentice, ensuring they are central to the process and kept informed throughout.
- To respond to individual cases, including attending multidisciplinary conferences as appropriate.
- To maintain proper records of referrals, complaint, or concern (even where that concern does not lead to a referral)
- To ensure that the recording is securely stored and archived.
- To give feedback to the member of team members who made the referral where appropriate, taking information sharing and confidentiality issues into account.

### Safeguarding Emergencies

These are classed as any life-threatening situation or emergency referrals which requires an immediate response due to an individual suffering or at risk of suffering significant harm:

- Ring for an ambulance and/or contact the police on 999
- Contact the Senior Designated Person /Designated Safeguarding Lead
- Quality Manager or Designated Safeguarding Coordinator
- Senior Leadership Team (SLT)

Designated Safeguarding Lead	Contact Details	Location
<b>Shekhar Sharma</b>	Shekhar Sharma <a href="mailto:shekhar@forwardacademic.team.com">shekhar@forwardacademic.team.com</a> <b>07903708006</b>	Head Office

- 24hr 7 days a week designated safeguarding number **07903708006**

### Non-life threatening but serious incidents

Contact the DSL or DSC on the above contact details. They will be able to support your query and advise next steps. In the unlikely event of not being able to contact any of the above ring one of the following, contact appropriate external below or our 24hr 7 days a week designated safeguarding number **07903708006**

You can also email: [shekhar@forwardacademic.team.com](mailto:shekhar@forwardacademic.team.com) All team members involved in non-emergency safeguarding referrals should ensure that any further information, suggesting a threat or risk to life or significant harm, should refer to the emergency guidance immediately

### External Advice and Guidance

In the situation where the DSL or DSC requiring additional guidance or assistance they will:

- Request an ambulance and/or contact the police on 999 or 101 non-emergencies
- If anyone feels that a child, young person, or vulnerable adult is being abused or mistreated or you have concerns about a child young person or vulnerable adults well-being they should contact qualified experts and raise your concern:

Out of hours emergency number for all councils	Children & Adults	0300 300 8123
NSPCC Helpline	Children Under 19	0808 800 5000

#### At Risk Groups

The following candidate/apprenticeship groups can be particularly vulnerable in terms of safeguarding and will need appropriate support.

#### Looked After Children or Those Leaving Care

Candidates/apprentices who are in care or are leaving care are a particularly vulnerable cohort and need to be identified, monitored, and supported throughout their time with **Star Greenwich Education**.

The Designated Safeguarding lead along with the Quality Manager must be informed immediately if a candidate/apprentice is found to be in care or leaving care and has not yet been identified as such.

Any safeguarding concerns can be referred through **Star Greenwich Education's** process set out in this document and / or referred directly to the DSL.

#### Young Carers or Young Parents

**Star Greenwich Education** acknowledges that young carers (YC) and young parents (YP) may need additional support to ensure they have equal access to education and training.

The Quality Manager will take responsibility for collating information about the YC / YP cohort and will liaise with curriculum and the DSL regarding the supporting and monitoring of these candidate/apprentices.

The Quality Manager and DSL must be contacted if a candidate/apprentice is found to be a carer or young parent who has not yet been identified as such.

#### Areas of Safeguarding Concern

##### Physical Abuse

This may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

##### Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children.

##### Psychological abuse

Psychological abuse can include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.

##### Sexual Abuse

Sexual abuse, including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressurised into consenting.

This involves forcing or enticing a child, young person, or vulnerable adult to take part in sexual activities whether the person is aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts e.g. rape or molestation. It may also include involving the looking at, or being involved in the production of, pornographic material or watching sexual activities, or encouraging the person to behave in sexually inappropriate ways.

#### Non-contact abuse

Abusive acts which do not involve actual physical contact; pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present.

#### Neglect

Neglect is the persistent failure to meet a child, young person or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, basic emotional needs. Neglect includes acts of omission, ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.

#### Discriminatory Abuse

Includes racism or sexism, abuse based on a person's disability, and other forms of harassment, slurs, or similar treatment.

#### Institutional Abuse

Occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice which affects the whole setting and denies, restricts or curtails the dignity, privacy, choice, independence or fulfilment of persons at risk. Institutional abuse can occur in any setting providing health and social care.

#### Risk to Self and/or Others

This may include but is not exclusive to severe self-harm, suicidal tendencies, or potential risk of harming others, which may or may not include children. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

Self-harm is a term that covers a range of behaviours used as a coping mechanism where an individual harms themselves by inflicting psychically pain or excess to deal with emotional pain.

- Common methods of deliberate self-harm include:
- Cutting
- Overeating or undereating
- Burning your skin
- Inserting objects into your body
- Hitting yourself or walls
- Taking an overdose
- Swallowing hazardous substances
- Exercising excessively

- Scratching and hair pulling

Most of the people who self-harm use this method as an attempt to cope with difficulties and problems they have experienced or continued to be experiencing. Often the purpose is to feel alive, and NOT to end their life. Favazza (1998) states quite definitely that self-harm is distinct from suicide. A basic understanding is that a person who attempts suicide is seeking to end their life and the end of feelings whereas a person who self-harms seeks to feel better. However, there is a possibility that those who self-injure may commit suicide either accidentally or deliberately as the result of their actions, therefore serious self-harm falls within safeguarding.

#### Financial or Material Abuse

Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

#### Making a Referral

All team members and volunteers at **Star Greenwich Education** are expected to be aware of and respond to any concerns regarding candidates/apprentices who are known or suspected to be experiencing abuse and harm and to pass these concerns on, following the **Star Greenwich Education** safeguarding procedures.

*A child is defined as anyone under the age of 18 and an adult at risk is defined as anyone 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.*

Where the candidate/apprentice is not a child or vulnerable adult the candidate/apprentice will need to agree to information being shared. The only exception to this is where the team members consider the candidate/apprentice to be at risk of serious harm.

#### **What to do if a candidate/apprentice discloses abuse or a member of team members has safeguarding concerns regarding a candidate/apprentice.**

Please note that these guidelines are designed to protect team members as well as candidates/apprentices. Transgressing professional boundaries can result in disciplinary action, please always adhere to these guidelines.

- Acknowledge it and take it seriously.
- Stay calm.
- Believe the person.
- Listen patiently; try not to ask any questions.
- Let them take their time. Reassure them that they are doing the right thing in telling you
- Write down the details, using their own words as far as possible. If appropriate, ask the candidate/apprentice to write it down. Log all information in the Confidential Comments section of Infusionsoft.
- Explain to the candidate/apprentice that you have a legal obligation to pass this information on, to protect both them and possibly other members of the family and the public.
- Refer the issue/incident to a designated Safeguarding member of team members i.e. Designated Safeguarding Lead or the Designated Safeguarding Coordinator.
- Members of the Safeguarding Team can make referrals to external social care teams.
- Ensure that the candidate/apprentice is safe and try to ascertain how safe they will be if they leave the learning environment, work, or return home.

- Respect confidentiality and do not discuss the disclosure with anyone other than the Designated Safeguarding Lead or the Designated Safeguarding Coordinator.
- The information must be treated with the strictest confidence – the ‘need to know’ principle must be employed. The safeguarding team has the responsibility to decide what further action are taken
- Where a candidate/apprentice has made a disclosure of abuse or a team member has concerns about abuse no contact is made with the candidate/apprentice’s parents or carers without consultation with the Designated Safeguarding Lead or the Designated Safeguarding Coordinator.
- You may have concerns that a candidate/apprentice is experiencing abuse because of their behaviour or changes in their presentation or that they are missing from education, training, or work. Signs and symptoms which may indicate abuse or harm are described in the online training. There are also some useful flowcharts at the end of this document. If you are still concerned contact the Designated Safeguarding Lead or the Designated Safeguarding Coordinator to discuss your concerns.
- A candidate/apprentice may disclose information that leads to concerns that another child or young person or Vulnerable Adult is experiencing abuse. You need to inform the candidate/apprentice that you will need to tell the Designated Safeguarding Lead or the Designated Safeguarding Coordinator.
- You may be contacted by the Designated Safeguarding Lead or the Designated Safeguarding Coordinator to request information from you about a candidate/apprentice. This is because **Star Greenwich Education** may be asked to contribute information to Children’s Social Care for an Assessment or Child Protection investigation. The Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will ensure that they are adhering to the government Information Sharing Guidance and will discuss with you what to inform the candidate/apprentice. Where possible we will be as open as possible with the candidate/apprentice.
- If you continue to be concerned about a candidate/apprentice after you have informed the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator contact them again to let them know.

Team members should not:

- Make promises you cannot keep.
- Promise confidentiality.
- Appear shocked, horrified, disgusted or angry.
- Make comments or judgements, other than to show sympathy and concern.
- Ask leading questions.
- Give sweeping reassurances.
- Take the matter further yourself.
- Contact any other agencies other than those stated in the process flow charts.
- Give candidate/apprentices money (refer to the XXXX).
- Give your mobile number to candidates/apprentices.
- Give lifts to candidates/apprentices. There may be the rare occasion where, due to an emergency or exceptional circumstance, a candidate/apprentice needs to be transported in a team member's vehicle but please note that a risk assessment will be required with authorisation from your line manager, a relevant member of the safeguarding or a member of SLT.
- In an emergency, where a candidate/apprentice needs to be transported to a place of safety, the police or a taxi must be used.

*On the rare occasion that a Designated Safeguarding Lead or the Designated Safeguarding Coordinator is unavailable, write down notes of what the candidate/apprentice has told you, or ask them to write it down themselves if you think this is appropriate for them. This is because they may not want to tell anyone again what they have shared with you.*

*Take down times, locations, and any other relevant facts. Do not include your own opinions or views about the disclosure although you can describe the manner or state of the candidate/apprentice when they present themselves to you.*

*It is rare but there is a possibility you may be asked to attend a multi-disciplinary meeting outside COMPANY XXXX and/or give evidence in court proceedings in relation to this disclosure. Sign and date each page of the notes.*

Specific Safeguarding Guidance

***Prevent: Radicalisation and Extremism***

*If there are concerns that a candidate/apprentice is becoming radicalised or attempting to radicalise others this needs to be reported to the DSL immediately.*

**Star Greenwich Education's** Specific Point of Contact for Prevent Referrals is the Quality Manager.

The Prevent Duty is part of the Counter Terrorism and Security Act 2015.

Section 26 of the Act places a duty on educational institutions to have 'due regard to the need to prevent people from being drawn into terrorism'.

Prevent is one strand of the Government's counter terrorism Strategy, CONTEST. Its main aim is to prevent people from becoming terrorists or supporting terrorism

**Protecting the UK against terrorism policy**

There are three main objectives:

- Terrorist ideas are identified and challenged.
- Vulnerable people are supported and protected from becoming terrorists or supporting terrorism.
- Communities, institutions, and the Government should all work together to tackle the problem of extremism.

Radicalisation is the process of causing someone to become a supporter of terrorism, or forms of extremism that lead to terrorism.

Any evidence of any aspect of extremism must be reported immediately. Please be vigilant for comments made on social media which may indicate vulnerability to radicalisation.

**What Causes Radicalisation?**

Yet, there has been no clear link or exact cause identified for someone becoming radicalised. This creates the sense that 'it could happen to anyone' which, in turn, increases the fear of radicalisation. The lack of an exact cause does not mean we know nothing, and it is important to focus on what we do know and stay informed of current guidance. Radicalisation is constantly shifting and changing.

What we know as of now is that the main risk factor identified in victims is vulnerability.

Those who are most vulnerable are (but not limited to):

- Younger people from age 13 upwards.
- Those experiencing an identity or personal crisis.
- Individuals with feelings of un-met aspirations or a sense of injustice.
- People with a need for adventure or excitement.
- Pre-existing conviction that their religion or culture is under threat.
- Individuals who feel socially isolated, and possibly, suffering from depression;
- Those who have a history of criminal behaviour.
- Some potential indicators:
  - Change in appearance
  - Search for answers - identity, faith and belonging



- Desire for adventure/excitement
- Desire to enhance self esteem
- Sense of grievance triggered by personal experience of racism/discrimination/aspects of government policy, etc
- Isolated from peers, associates with only 1 group of people
- Withdrawal from family members
- Additional vulnerability risk factors: Special Educational Needs, Mental Health Issues, Alcohol and Drug abuse
- Some potential warning signs:
  - Graffiti, symbols, or artwork promoting extremist messages
  - Accessing extremist material online
  - Changes in behaviour, friendship, and actions
  - Young people voicing opinions drawn from extremist ideologies or narratives
  - Use of extremist or hate terms to exclude others or incite violence

People who are at risk of being drawn into terrorist activity can be supported through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

**Star Greenwich Education** regulations regarding use of IT are included in the IT policy. Internet usage in **Star Greenwich Education** is monitored and any concerns raised through safeguarding.

All **Star Greenwich Education** employees have a duty to report any concerns about extremist behaviour or potential radicalisation.

Candidate/apprentices taking time off during agreed from agreed delivery time

It is a **Star Greenwich Education** requirement to report any candidate/apprentice asking for authorised absence during term time of 5 days or more. Such candidates/apprentices must be referred to the Designated Safeguarding Lead or the Designated Safeguarding Coordinator.

Relevant checks will be carried out in line with safeguarding policy. Leave during term time for holiday purposes should not be authorised.

In the event of a candidate/apprentice taking unauthorised leave during term time of 5 days or more, the curriculum team members should alert the Designated Safeguarding Lead or the Designated Safeguarding Coordinator if they do not return when expected.

## Forced Marriage

*A Forced Marriage is a relationship conducted without the valid consent of both parties, where duress is a factor.*

Forced Marriage is different from, and should not be confused with, arranged marriage. A Candidate/apprentice who feels they are likely to be forced to marry someone they do not wish to marry is invariably experiencing some form of abuse such as physical, psychological, financial, sexual, and emotional pressure.

If there are concerns that a candidate/apprentice is in danger of a forced marriage the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will follow government guidelines and contact will be made with the Government Forced Marriage Unit. ([fmu@fco.gov.uk](mailto:fmu@fco.gov.uk) Telephone: 020 7008 015)

*Forced marriage is illegal in the UK.*

Confidentiality is extremely important in these circumstances. Try to ascertain how immediate the risk may be. If the candidate/apprentice is under 18 years or vulnerable, team members must consult with a Designated Safeguarding Lead or the Designated Safeguarding Coordinator immediately. If the candidate/apprentice is not

under 18 or vulnerable, team members may wish to consult with the Designated Safeguarding Lead or the Designated Safeguarding Coordinator for support and advice.

If the candidate/apprentice is going overseas imminently it is important to contact the Designated Safeguarding Lead or the Designated Safeguarding Coordinator immediately and to gather as much information as possible from the candidate/apprentice.

The candidate/apprentice's family should not under any circumstances be contacted without consultation with the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator and Candidate/apprentice. Confidentiality within **Star Greenwich Education** is also essential.

### Child Sexual Exploitation

Child sexual exploitation is illegal activity by people who have power over children and young people and use it to sexually abuse them. This can involve a broad range of exploitative activity, from seemingly 'consensual' relationships and informal exchanges of sex for attention, accommodation, gifts, or cigarettes, through to serious organised crime. Children and young people at risk of sexual exploitation are some of the most vulnerable in our society. Many have experienced abandonment or have suffered from physical and mental abuse previously. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited may not exhibit any external signs of this abuse. If you become aware of or suspect that a candidate/apprentice is being sexually exploited this needs to be reported to the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator using the safeguarding procedures outlined.

*Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something'*

*(e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing sexual activities on them.*

*Child sexual exploitation can occur using technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.*

*Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.*

### Female Genital Mutilation (FGM)

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK and team members working within education or health have a duty to report any evidence of FGM. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. The procedure is traditionally carried out by a woman with no medical training. Anesthetic and antiseptic treatments are not generally used, and the practice is usually carried out using knives, scissors, and scalpels, pieces of glass or razor blades

FGM is illegal in the UK. It is also illegal to arrange for a child to be taken abroad for FGM. If caught, offenders face a large fine and a prison sentence of up to 14 years

All professionals have a duty to act to safeguard girls at risk of FGM with four key issues to consider:

- An illegal act being performed on a female, regardless of age

- The need to safeguard girls and young women at risk of FGM
- The risk to girls and young women where a relative has undergone FGM
- Situations where a girl may be removed from the country to undergo FGM.

There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a significant risk. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/216669/dh\\_124588.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216669/dh_124588.pdf)

### Bullying: Person to Person

Bullying is one of the most common forms of abuse. For some young person's/vulnerable adults, bullying can be taken to the extreme and can make their lives intolerable. Bullying is something that needs to be taken very seriously. There is sufficient evidence to show that the consequences of bullying can be devastating both to the victim and their family.

There are three main types of bullying:

- Physical, e.g. hitting, kicking or theft
- Verbal, e.g. racist or homophobic remarks
- Emotional, e.g. persistent negative feedback

All these will include:

- Deliberate hostility and aggression towards the victim
- A victim who is weaker and less powerful than the bully or bullies
- An outcome which is always painful and distressing for the victims

Bullying behaviour may include:

- Other forms of violence
- Sarcasm, spreading rumours, persistent teasing
- Torment, ridicule, humiliation
- Racial taunts, graffiti, gestures
- Unwanted physical contact or abusive, offensive comments of a sexual nature

### Cyber Bullying

Mobile phone/computer bullying involves several behaviours including:

- Sending anonymous texts, making threats of violence
- Communicating through e mails/ chat rooms/messaging services
- Giving out personal information that young people feel embarrassed about
- Sending frightening or obscene images with or without a threat

### Honour Based Violence

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly

believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a culture

The term 'honour-based crime' covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. It may or may not involve violence.

It can include:

- personal attacks of any kind, including physical and sexual violence
- forced marriage
- forced repatriation (sending someone back to a country from which they originate without their consent)
- written or verbal threats or insults
- threatening or abusive phone calls, emails, and instant messages

The Police record and investigates all instances of honour-based violence, even in cases where there is only a small amount of information or when a victim has not reported it themselves. They do this so that we can provide more protection that could prevent further abuse or violence or in some cases, forced marriage.

### Domestic Violence

Domestic violence also known as domestic abuse is defined as: *"An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality".*

*Home Office: 24<sup>th</sup> March 2015-Domestic Violence.*

Domestic violence can include, but is not limited to, the following types of abuse: psychological, emotional, physical, sexual, and financial. It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage.

Domestic violence affects people of every class, gender, wealth, geography, age, race, disability, and sexuality. The violence can begin at any stage of the relationship and may continue after the relationship has ended. Domestic violence is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

If a candidate/apprentice discloses they are in an abusive relationship, we have a duty to offer them support, and /or find the relevant organisation that may be able to help them. If the candidate/apprentice is a child, the information must be shared with the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator without delay.

If the candidate/apprentice is an adult, it is important to establish if they have children under 18. If the victim does have young children a referral may need to be made to Children's Social Care, with consent from the parent.

### Sexting

Sexting generally refers to the sending of sexually explicit images via text, email, internet or through social networking sites. For example, this could be a picture of a boy or young man exposing himself or a young woman in a state of undress. 'Sexting' is more common than you may think and has been found to be commonplace amongst children and young people.

There was a 28% increase in calls to ChildLine in 2012/13 (compared to the previous year) that mentioned 'sexting' – nearly one every day.

Most young people do not see 'sexting' as a problem and are reluctant to talk to adults about it because they are afraid of being judged or having their phones taken away. It may be common, but 'sexting' is illegal. By sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission.

Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (distribution of child pornography) and can face police action, even if their actions are entirely voluntary.

### Online Safety

With the launch in 2005 of the Government's e-strategy, 'Harnessing technology: Transforming learning and children's services', the prospects for children and candidates/apprentices of all ages to embrace the new opportunities offered by ICT has grown.

What we must ensure, however, is that the e-safety aspects are not left to chance. Children and indeed candidates/apprentices of all ages need to develop digital literacy skills that help them to become safe and responsible users of new technologies and allow them to be discriminating users of both the content they discover and the contacts they make when online.

Online safety risks can be summarised under the following three headings.

#### *Content*

- Exposure to age-inappropriate material
- Exposure to inaccurate or misleading information
- Exposure to socially unacceptable material, such as that inciting violence, hate or Intolerance including extremism and radicalisation
- Exposure to illegal material, such as images of child abuse
- Illegal Downloading of copyrighted materials e.g. music and films

#### *Contact*

- Grooming using communication technologies, potentially leading to sexual assault and/or child prostitution
- Bullying via websites, mobile phones, or other forms of communication device

#### *Commerce*

- Exposure of minors to inappropriate commercial advertising
- Exposure to online gambling services
- Commercial and financial scams

The creation, downloading, distribution and copying of pornographic images of children are child abuse and are criminal offences. They are classed as gross misconduct and will lead to instant dismissal for team members and Behaviour Support process with possible exclusion for candidates/apprentices.

If you become aware of the creation, downloading, distribution or copying of pornographic images of children: contact the Designated Safeguarding Lead or the Designated Safeguarding Coordinator immediately. If they are not available contact a member of the Senior Leadership Team immediately.

Candidates/apprentices who may present a risk to other candidate/apprentices, including sex offenders and violent offenders.

If any member of team members becomes aware or is concerned that a candidate/apprentice who is enrolling or already attending **Star Greenwich Education** may have been involved in sexual or violent offences this

information needs passing immediately to the Designated Safeguarding Lead or the Designated Safeguarding Coordinator who will contact outside agencies to obtain any risk information on a 'need to know' basis. COMPANY XXXX does have a role in rehabilitation of offenders but will assess the risks to other candidate/apprentices.

#### **Allegations of a candidate/apprentice abusing another candidate/apprentice**

If a candidate/apprentice has reported being abused by another candidate/apprentice, the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator are contacted immediately. The candidate/apprentice who it is alleged has been abused will be advised regarding reporting to the police. In some circumstances the Designated Safeguarding Lead will contact the Police especially if the alleged victim is vulnerable. If the candidate/apprentice is under 18 years their parents may be contacted (candidate/apprentices wishes will be considered when deciding this). Serious consideration of immediate suspension of the candidate/apprentice who is alleged to have abused the other candidate/apprentice will be given whilst an investigation is undertaken. If the decision is taken not to suspend the candidate/apprentice a risk assessment will be undertaken, and a risk management plan put in place (coordinated by the Designated Safeguarding Lead). If the Police or Children's Services or the Adult Protection Unit are undertaking an investigation it is likely that **Star Greenwich Education** will need to wait for the outcome of this to undertake its own investigation (in some cases this takes several months). The safety of other candidate/apprentices must be considered in any disciplinary process. Support needs to be offered to the candidate/apprentice alleging abuse and where appropriate the alleged abuser.

#### **Removing a candidate/apprentice to a place of safety**

- If a candidate/apprentice discloses domestic violence / abuse, or threat of forced marriage, or 'lock down' (not permitted to leave home or movements severely restricted, not permitted to use internet / mobile, passport and other ID confiscated at home) and declares that they would like to be taken to a place of safety you need to:
- Report immediately to the Designated Safeguarding Lead or the Designated Safeguarding Coordinator
- They will contact the appropriate external agencies.
- Arrangements will be made to remove the candidate/apprentice to a safe place (this might be local or out of area depending on the wishes of the candidate/apprentice and availability of rooms)
- The police or a taxi service are used to transport a candidate/apprentice in this situation.
- Under no circumstances should team members put themselves at risk of harm by using their own vehicles to transport a candidate/apprentice to a place of safety, without consultation with the Designated Safeguarding Lead or the Designated Safeguarding Coordinator.
- The candidate/apprentice may be removed on the same day or within a noticeably short period of time after disclosure depending on the urgency of the case.
- The candidate/apprentice should not return to the domestic residence to collect belongings in cases of high risk. This can be done later under police escort.
- Under no circumstances should the candidate/apprentice's family/carers be contacted.
- The Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will inform the police of the situation.
- If a child is involved, the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will contact the relevant team to discuss arrangements. If an allegation of abuse is made against a child, then the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will contact the local Children's Safeguarding Team.
- The Police will then respond accordingly to any reports of the candidate/apprentice as a missing person.
- If the family members / carers contact **Star Greenwich Education** they are referred to the Designated Safeguarding Lead or the Designated Safeguarding Coordinator.
- No information is shared with the caller about whether the candidate/apprentice is or is not attending a **Star Greenwich Education** programme.
- In some cases, the candidate/apprentice will be withdrawn from a **Star Greenwich Education** programme. In some cases, the candidate/apprentice will remain on course. In these situations, the Designated

Safeguarding Lead or the Designated Safeguarding Co-ordinator will ensure appropriate measures are in place to maximise the safety of the candidate/apprentice entering and leaving a COMPANY XXXX programme.

- Financial support is sought for candidate/apprentices remaining on course having been removed to a place of safety.

#### Allegations against team members

The statutory guidance in Keeping Children Safe in Education 2015 will be followed in relation to allegations against team members.

If allegations are made against a member of team members, which involve a candidate/apprentice on a **Star Greenwich Education** programme the same procedures as outlined above must be followed. The Designated Safeguarding Lead will inform the Chief Executive Officer (Shekhar Sharma). The matter will be investigated in accordance with the Team members Disciplinary procedure and depending on the severity of the allegations, outside agencies may be informed. Following the investigation, the formal disciplinary procedure may be invoked. The team members may be suspended pending a full investigation.

If allegations are made which do not involve a candidate/apprentice at **Star Greenwich Education**, the team members must inform the Designated Safeguarding Lead, who will collate information to report to the Operation Manager. The matter will be investigated in accordance with the Team members Disciplinary procedure and depending on the severity of the allegations, outside agencies may be informed. Following the investigation, the formal disciplinary procedure may be invoked. The team members may be suspended pending a full investigation.

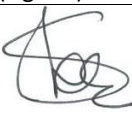
The following definitions will be used following any investigation:

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation, the term, therefore, does not imply guilt or innocence.

Depending on the outcome of an investigation and any appropriate disciplinary action, an appropriate referral to the Disclosure and Barring Service will be made. Referrals to the Disclosure and Barring.

Service will also be made should a resignation take place during the investigatory phase or prior to a formal disciplinary hearing. 'Settle Agreements' will not be appropriate in these circumstances.

Members of team members involved in allegations will have a designated contact at **Star Greenwich Education** who either a senior manager or a member of the HR team will be. If the employee has a grievance this is pursued in accordance with the **Star Greenwich Education** Grievance Procedure.

Written By	Revision Date	Revision Number	Approved By (signed)	Review Date
Shekhar Sharma	1 February 2022	V1		1 February 2023

**This policy has been approved & authorised by:**

A handwritten signature in black ink, appearing to read "Shekhar Sharma".

Shekhar Sharma  
Director  
StarGreenwich Education Limited