



NESSie IN EDCIC

**Safeguarding Policy**

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## 1. Introduction

This policy applies to all staff including senior managers and Board of Directors, paid staff, volunteers and sessional workers, freelance staff, students or anyone working on behalf of NESSie IN ED CIC (hereafter referred to as 'NESSie'). It shows a commitment to protecting and safeguarding children against potential harm or actual harm. It fully accepts and promotes the principle enshrined in the Children Act 1989 that the welfare of the child is paramount.

Everyone employed at NESSie has a responsibility in relation to child protection. In most cases this will be the referral of concerns to the Designated Senior Person (DSP), in the school / setting that they are working, and their NESSie supervisor or DSP. In day-to-day contact with children at risk, where appropriate, staff members have the opportunity to note concerns and to meet with parents and other associated adults.

NESSie recognises its key role in partnership with other children's services. This policy demonstrates a commitment to working with statutory bodies, voluntary agencies to promote the safety and welfare of children and acting promptly whenever a concern is raised about a child or about the behaviour of an adult. NESSie will work with the appropriate statutory bodies when an investigation into child abuse is necessary.

This policy aims to outline the role of the company; the procedures that staff should follow and guidance on issues related to child protection. It is not exhaustive and should be used as a rule of thumb. The needs and safety of the individual child must be at the center of any decision taken.

We will endeavour to safeguard children and young people by:

*Helping children and young people thrive*



- Valuing them, listening to respecting them
- Adopting Child Protection guidelines through procedures and a Code of Conduct for staff and volunteers
- Recruiting staff and volunteers safely ensuring all necessary checks are made
- Sharing information about child protection and good practice with children, parents, staff and volunteers
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately
- Providing effective management for staff and volunteers through supervision, support and training.
- Reviewing our policy and good practice annually.

NESSie will endeavour to safeguard the children we work with by following the procedure if a concern is raised about a child's welfare. The definition of a child for the purpose of this document is anyone under the age of 18 years. *(Please note: the national definition of domestic abuse is set in context of 16 years plus, taking into account how this may impact, or dictate response).*

**It is important that everyone in the organisation is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not the abuse has occurred. That is a task for the professional Child Protection agencies e.g. Children's Services following a referral to them about a child.**

## 2. Important Contacts

NESSie has an appointed individual who is responsible for dealing with any safeguarding concerns. In their absence, a deputy will always be available for workers to consult with.

The named persons for child protection within NESSie are:

NESSie Senior Lead for Safeguarding and Child Protection	Rachel Lambie
Work telephone number	
Mobile number	07930897803
Email address	rlambie@nessieined.com
Emergency number	07930897803

Name of Deputy	Sarah Blackford
Work telephone number	07949368941
Mobile number	
Email address	Sblackford@nessieined.com
Emergency number	07949368941



Further useful contacts are listed in Appendix 4

### Other Important Contacts

<b>Hertfordshire Children's Services</b>	<b>0300 123 4043 (including out of hours)</b>
<b>Police (Child Abuse Investigation Unit CAIU)</b>	<b>0845 33 00 222 (or in an emergency 999)</b>
<b>NSPCC Helpline</b>	<b>0808 800 5000</b>

Further useful contacts are listed in Appendix 4

### 3. Responsibilities of individuals in implementing this policy and procedure

All members of NESSie are to:

- Understand and apply this policy and procedure in their activities
- Identify opportunities and undertake appropriate training to support them in their role
- Act appropriately at all times and be able to challenge inappropriate behaviour in others
- Be able to recognise harm
- Know how to report any concerns in a timely and appropriate way.

In addition, senior members of the organisation are to:

- Encourage all staff and volunteers to understand this policy and procedure
- Offer opportunities to undertake appropriate safeguarding training and refresher training
- Ensure that the policy and procedure is adhered to and to undertake regular compliance audits
- Ensure that a whistle blowing policy is developed, agreed and communicated with all staff and volunteers

The role and responsibilities of the named person(s) is:

- To ensure that all staff are aware of what they should do and who they should go to if they are concerned that a child/young person maybe subject to abuse or neglect.
- Ensure that any concerns about a child/young person are acted on, clearly recorded, referred on where necessary and, followed up to ensure the issues are addressed.
- The named person(s) will record any reported incidents in relation to a child/young person or breach of Safeguarding policies and procedures. This will be kept in a secure place and its contents will be confidential.



Link to [Report concerns about a child or request support.](#)

NESSie will be responsible for recording concerns with the school/setting DSP, recommending action within the school/setting and liaising (when appropriate) with Children's Services (Social Services) and other agencies over cases of abuse and suspected abuse; acting as a source of advice for the school, the referral of individual cases of suspected abuse, liaising with agencies about individual cases, making an onward referral if circumstances warrant it. Where there is uncertainty about making a full referral, advice will be sought from Children's Services. If the concern regards the Head teacher, the Chair of Governors should be informed.

It is essential all staff and volunteers are aware of the Safeguarding Children Board's website of the local county council to the educational setting. The website is kept up to date and has detailed best practice regarding Child Protection Procedures. NESSie's offices are based in Hertfordshire, as such the local County Council NESSie, as an organisation, automatically defers to is Hertfordshire County Council, as such all staff and volunteers should read and refer to this policy: [www.hertssafeguarding.org](http://www.hertssafeguarding.org) Safer Recruitment Staff and Volunteers

In developing this policy NESSie intends that it will promote the welfare of children and young people attending and taking part in activities. Children and young people and their parents / carers can be assured that NESSie takes their welfare seriously and wants them to enjoy the activities in a safe and secure environment.

Every adult who works with or on behalf of NESSie is aware of the contents of this policy and understands what the reporting procedures are if there are any activities that may be unsafe or may present a risk of harm, or if the child or young person (or their parent(s) / carer(s)) makes a disclosure of abuse or an allegation against an adult working with them. Such disclosures or allegations will be taken very seriously to ensure that the child is protected.

These procedures are revisited with all staff annually.

All staff undergo Refresher Children Protection in Education every year and full training on a 3 year cycle.

All staff need to be alert to the signs of abuse as detailed in this policy. They should report any concerns immediately to the DSP at the school/setting, making a note of the concern and the action taken, in line with the NESSie Data Protection Policy. If the setting requires them to use any written documentation, all forms will be signed by the school / setting and kept at the school. Once the setting has been informed staff will contact the NESSie DSP or DSL to make them aware. NESSie DSP/DSL will update and monitor the risk on their Risk Register including records of who was informed and where the consent was noted. If the concern is related to private counselling, NESSie will inform the parent/carer where appropriate and make a referral or gain advice from children's services.



All staff will be given the following information: “apply the procedures detailed below for responding to a suspected case remembering that the needs and safety of the child must always come first, you cannot promise confidentiality, information should only be shared with those who need to know. It is important to stay calm and be reassuring, when in doubt, text your DSP (Sarah Blackford) or DSL (Rachel Lambie) and arrange an extra-ordinary session to gain their advice.”

#### 4. Policy Statement

##### **NESSie IN ED CIC [NESSie]**

It is imperative that groups are equipped with the knowledge and awareness that will enable them to detect any abuse or ill treatment of children. This policy document therefore aims to be a reference for all members of staff and volunteers involved.

##### **In implementing this Child Protection/Safeguarding Policy NESSie will:**

- Ensure that all workers understand their legal and moral responsibility to protect children and young people from harm, abuse and exploitation by including training on child protection in their induction and in subsequent training that is undertaken.
- Ensure that all workers understand their responsibility to work to the standards that are detailed in the organisation’s Child Protection Procedures and work at all times towards maintaining high standards of practice.
- Ensure that all workers are aware of the HSCP Procedures and are confident in how to work within these guidelines by ensuring their attendance at training and at subsequent refresher training organised by the HSCP (as required).
- Ensure that all workers understand their duty to report concerns that arise about a child or young person, or a worker’s conduct towards a child/young person, to the organisation’s named person for child protection.
- Ensure that a named person responsible for child protection is appointed and that they understand their responsibility to refer any child protection concerns to the statutory child protection agencies (i.e. police and/or Children’s Services).
- Ensure that any procedures relating to the conduct of workers are implemented in a consistent and equitable manner.
- Provide opportunities for all workers to develop their skills and knowledge, particularly in relation to the welfare and protection of children and young people.
- Ensure that children and young people are enabled to express their ideas and views on a wide range of issues and will have access to the organisation’s complaints procedure.
- Ensure that parents/carers are encouraged to be involved in the work of the organisation and, when requested, have access to all guidelines and procedures.
- Endeavour to keep up to date with national developments relating to the welfare and protection of children and young people.
- Ensure that appropriate background checks are undertaken when anyone joins the organisation and before they start working directly with children and young people.



- Ensure that all people working directly with children and young people have at least a basic understanding of child protection and as part of their training have at the very least undertaken an online, certificated child protection course.

## 5. Legal Framework

The Children Act 1989 sets out that the child's welfare is paramount and safeguarding and promoting it is the priority.

The Children Act 2004 set out a duty on local authorities to work closely with those providing services to children and young people.

Working Together to Safeguard Children 2018 sets out how organisations and individuals should work together to safeguard and promote the welfare of children and young people in accordance with the Children Act 1989 and the Children Act 2004. It is important that all practitioners working to safeguard children and young people understand fully their responsibilities and duties as set out in primary legislation and associated regulations and guidance.

The UN Convention on the Rights of the Child (UNCRC) sets out key principles which are enshrined within these acts and the statutory guidance. From 15 January 1992, when the treaty came into force, every child in the UK has been entitled to over 54 specific rights, some of which are:

- The right to life, survival, identity and development
- Freedom of thought, belief and religion
- Protection from violence, abuse and neglect
- The right to have their views respected, and to have their best interests considered at all times
- The right to a name and nationality, freedom of expression, and access to information concerning them
- The right to live in a family environment or alternative care, and to have contact with both parents wherever possible
- Health and welfare rights, including rights for disabled children, the right to health and health care, and social security
- The right to education, leisure, culture and the arts
- Special protection for refugee children, children in the juvenile justice system, children [deprived of their liberty and children suffering economic, sexual or other](#) forms of exploitation.

The rights included in the convention apply to all children and young people, with no exceptions. UNCRC [website](#)

## 6. Recognising abuse and neglect

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## 6.1 Definition of abuse

Abuse and neglect are forms of maltreatment of a child. 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, by a stranger or via the internet. They may be abused by an adult or adults, or another child or children.

An abused child is any boy or girl, under 18 years of age, who has experienced, or is believed likely to be at risk of, significant risk of neglect, and / or physical, emotional or sexual abuse.

### 6.1.1 Physical abuse (including when masqueraded as discipline and chastisement)

*The following definition is taken from Working Together (Working Together 2018)*

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

Physical abuse often arises from a wish to chastise. Smacking is illegal in England but has a legal defence of “reasonable chastisement” under Section 58 of the Children Act 2004 but only in a charge of common assault. Whether a 'smack' amounts to reasonable chastisement will depend on the circumstances of each case, taking into consideration factors e.g. age of the child and the nature of the smack.

The introduction of section 54 of the Children Act 2004 changed the law, to remove the reasonable chastisement defence for actual bodily harm. Actual bodily harm includes minor visible injuries such as a graze, a scratch, an abrasion or bruising around the eye. Common assault implies a transient trifling injury such as reddening of the skin or no injury at all. The use of an implement to hit a child though not specifically prohibited is more likely to leave a mark. Thus, the law allows a parent to smack a child where doing so leaves no mark upon the skin, so only light smacks are permitted. “Over chastisement” which implies at least actual bodily harm would be against the law and the reasonable chastisement defence would not apply. This means, for example, that a parent can no longer justify beating a child on the grounds that the child is difficult to raise.

Although the reasonable chastisement defence only applies to the criminal law the concept influences decisions taken in the family courts. The defence applies only to parents and adults acting in loco parentis (teacher or other adult responsible for the children) with the parent’s permission. Physical chastisement, i.e. corporal punishment, of any form has been prohibited in state schools since 1986, private since 1998 and by child minders since 2003.

It is important that all professionals treat injuries caused to children by their parents as an assault and do not condone or excuse this because their intention was to discipline the child.



Professionals should be cautious about referring to such assaults as “over-chastisement” as this can have the effect of minimising the impact on the child of the injuries or implying the child’s behaviour was a contributory cause.

There is evidence that even smacking allowed within the law is harmful to children. For example, minor forms of regular smacking of pre-school children is associated with an increased risk of antisocial behaviour after 2-3 years even when allowing for other parenting risk factors and the presence of such behaviour at study entry 6, 7 Maternal depression and violence between adult partners are associated with a greater risk of smacking children than either factor present alone regardless of child behaviour.<sup>8</sup> Parents who experience physical punishment in their childhood are more likely to smack their own children.

## Signs

Although these signs do not necessarily indicate that a child has been physically abused, they may help adults recognise that something is wrong. The possibility of physical abuse should be investigated if a child shows a number of these symptoms, or any of them to a marked degree:

- Unexplained recurrent injuries or burns
- Improbable excuses or refusal to explain injuries
- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Bald patches
- Multiple missing episodes
- Fear of medical help or examination
- Self-harming tendencies
- Aggression towards others
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted

### 6.1.2 Emotional Abuse

*The following definition is taken from Working Together (Working Together 2018)*

*Emotional abuse is a form of [Significant Harm](#) which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional 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*



*opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.*

*These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.*

*Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.*

## **Signs**

Although these signs do not necessarily indicate that a child has been emotionally abused, they may help adults recognise that something is wrong. The possibility of emotional abuse should be investigated if a child shows a number of these symptoms, or any of them to a marked degree:

- Physical, mental and emotional development delay
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression
- Inability to cope with praise
- An unwillingness or inability to play

### **6.1.3. Sexual Abuse**

*The following definition is taken from Working Together (Working Together 2018)*

*Sexual abuse is a form of **Significant Harm** which involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.*

## **Signs**

Although these signs do not necessarily indicate that a child has been sexually abused, they may help adults recognise that something is wrong. The possibility of sexual abuse should be investigated if a child shows a number of these symptoms, or any of them to a marked degree:

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- Starting to wet again, day or night/nightmares
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism

### *6.1.4 Financial abuse*

Abuse including theft, fraud, financial exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

### *6.1.5 Institutional abuse*

Abuse including neglect and poor care practice within an institution or specific care setting such as residential settings e.g., children's home, school or secure unit. This may range from isolated incidents to continuing ill-treatment'.

### *6.1.6 Discriminatory abuse*

Discriminatory abuse links to all other forms of abuse.

- Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals.
- It is the exploitation of a person's vulnerability, resulting in repeated or pervasive treatment



of an individual, which excludes them from opportunities in society, for example, education, health, justice, civic status and protection.

- It includes discrimination on the basis of race, gender, age, sexuality, disability or religion.

#### *6.1.7 Neglect*

*The following definition is taken from Working Together (Working Together 2018)*

*Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born neglect may involve a parent or carer failing to:*

- *provide adequate food, clothing and shelter (including exclusion from home or abandonment)*
- *protect a child from physical and emotional harm or danger*
- *ensure adequate supervision (including the use of inadequate caregiver)*
- *ensure access to appropriate medical care or treatment.*

*It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.*

#### **Signs**

Although these signs do not necessarily indicate that a child has experienced neglect, they may help adults recognise that something is wrong. The possibility of neglect should be investigated if a child shows a number of these symptoms, or any of them to a marked degree:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing/lacks sufficient clothing for the weather
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies
- Learning disabilities due to poor brain development

Note: A child may be subjected to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening from everyone.

#### *6.1.8 Child Sexual Exploitation*

*The following definition is taken from DfE: Child Sexual Exploitation, February 2017*

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Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows:

*Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.*

**Child sexual exploitation is never the victim's fault, even if there is some form of exchange:** all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Sexual exploitation can have links to other types of crime. These include:

- Child trafficking
- Domestic abuse
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution
- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude

The following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation:

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status



- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity

Children rarely self-report child sexual exploitation so it is important that practitioners are aware of potential indicators of risk, including:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

### **Children can be perpetrators as well as victims**

Children can be both experiencing child sexual exploitation and perpetrating it at the same time. Examples might include a child who is forced to take part in the exploitation of another child under duress, or a child who is forced to introduce other children to their abuser under threats to their family's safety.

These situations require a nuanced approach that recognises and engages with the young person's perpetration within the context of their own victimisation.

Children who perpetrate child sexual exploitation require a different response to adult perpetrators. Responses may involve criminal justice pathways at times, however every child who displays harmful sexual behaviour should also have their safeguarding and welfare needs actively considered in line with *Working Together*.

**Safeguarding children is everyone's responsibility.** All practitioners should assume that in the course of their work with children they will encounter children at risk of sexual exploitation. All practitioners working with children and families need to **know where to get help**: Local multi-agency safeguarding arrangements will set out the process for referring concerns about the welfare of children to local authority children's social care. Anyone can make a referral and





ask for advice. If a child is considered to be in immediate danger the police should be contacted

### 6.1.9 Child Criminal Exploitation

The following definition is taken from the Government website: [Guidance exploitation and vulnerable adults: county lines, February 2020](#)

#### **What is child criminal exploitation?**

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

*“Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.”*

Criminal exploitation of children is broader than just county lines and includes for instance children forced to work on cannabis farms or to commit theft.

#### ***Dangers of criminal exploitation*** (as define on NSPCC website)

It’s important to be aware of the risks of criminal exploitation or being involved with a criminal gang. They can use different tactics to recruit and exploit children and young people, including bribing them with rewards, befriending them, and threatening them, or coercing them.

Dangers of criminal exploitation include:

- being subject to threats, blackmail and violence
- being exploited and forced to commit crimes
- being arrested, including for crimes committed by the gang that they have not directly committed under [the law of joint enterprise](#)
- not being able to leave or cut off ties with the gang
- having their safety or the safety of friends and family threatened
- risk of physical harm, rape and sexual abuse
- risk of emotional abuse
- risk of severe injury or being killed
- abusing drugs, alcohol and other substances
- long term impact on education and employment options.

Exploiting a child into committing crimes is abusive. Children who are targeted can also be [groomed](#), [physically abused](#), [emotionally abused](#), [sexually exploited](#) or [trafficked](#). However, as children involved in gangs often commit crimes themselves, sometimes they are not seen as victims by adults and professionals, despite the harm they have experienced. It’s important to spot the signs and act quickly if you think a child is being groomed or is becoming involved





with a gang.

Please visit the [NSPCC website](#) for further guidance on Child Criminal Exploitation

#### *6.1.10 Effects of Domestic Abuse*

Please see the [NSPCC website](#) for guidance on advice for professionals on how to support children exposed to domestic abuse.

Effects of domestic abuse (NSPCC website)

*Living in a home where domestic abuse happens can have a serious impact on a child or young person's [mental](#) and physical wellbeing, as well as their behaviour. And this can last into adulthood. What's important is to make sure the abuse stops and that children have a safe and stable environment to grow up in. Our [services](#) can support children and young people who have experienced domestic abuse to help them move on and receive the care they need.*

#### *6.1.11 Extremism*

*The following definition is taken from Working Together (Working Together 2018)*

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

#### *6.1.12 Bullying and Cyberbullying*

Bullying affects everyone at some point in their lives. It may be at school, at college, in an activity group or club, in the workplace or even at home.

Parents, carers, teachers and others working with children have a duty to take action if they suspect or discover that child(ren) are being bullied.

Bullying includes:

- People calling you names
- Making things up to get another person into trouble
- Hitting, pinching, biting, pushing and shoving
- Taking things away from someone

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- Damaging another person's belongings
- Stealing someone's money
- Taking friends away from them
- Cyberbullying
- Spreading rumours
- Upskirting - this is a criminal offence and must be reported to the Police.
- Threats and intimidation
- Making silent or abusive phone calls
- Bullies can also frighten the victim so that they don't want to go to school or take part in other activities.
- The victim may pretend to be ill to avoid the bully

Cyberbullying is bullying that takes place online. Unlike bullying in the real world, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone. Types of cyberbullying can include:

- Sending threatening or abusive text messages
- Creating and sharing embarrassing images or videos
- Trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities or friendship groups
- Shaming someone online
- Setting up hate sites or groups about a particular child
- Encouraging young people to self-harm
- Voting for or against someone in an abusive poll
- Creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- Sending explicit messages, also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations.

Developing a 'Code of Conduct' with children and young people can assist with minimising the opportunity for bullying and encourage their participation in the activities of the group.

## 6.2 Self Harm

If it comes to the attention of any member of staff that a child is self-harming, they should alert the parent and school and NESSie DSP as soon as possible. Actions by the DSP might include contacting parents, contacting Child Adolescent Mental Health Services, or contacting Children's Services if the child meets the referral criteria. If it comes to the attention of any member of staff that a person may be at risk of suicide, they will alert the DSP as soon as possible. If possible, they will conduct a risk assessment and safety plan to accompany the report.



## 7. Steps to follow if you are worried about a child or if a child confides in you

NESSie recognises that it has a duty to act on reports or suspicions of abuse and believes that the safety of the child should override any doubts, hesitations, or other considerations (such as the potential to have a negative impact on professional relationships with a family). When worrying changes are observed in a child's or young person's behaviour, physical condition or appearance, staff will follow the steps set out below.

If a child confides in you:

- Stay calm, approachable and open to what they have to say
- Listen to them carefully without interrupting
- Make it clear that you are taking what they are telling you seriously
- Acknowledge that you understand how difficult this might be for them to say what they are saying
- Reassure them that they have done the right thing by telling someone
- Let them know that you will do everything you can to help them
- Do not show any shock or disgust
- Do not probe further
- Do not ask leading questions that might suggest the answer
- Do not make assumptions
- Do not make any comments about the alleged abuser
- Do not make promises you cannot keep, particularly about keeping the information 'secret', but explain that you may need to share it with an appropriate person
- Do not discuss with colleagues apart from the Designated Safeguarding Lead (or their deputy); and

Follow the steps set out below

### Step 1

- Initially talk to a child/young person about what you are observing. It is okay to ask questions, for example: "I've noticed that you don't appear yourself today, is everything okay? But never use leading questions
- Listen carefully to what the young person has to say and take it seriously
- Never investigate or take sole responsibility for a situation where a child/young person talks about matters that may be indicative of abuse
- Always explain to children and young people that any information they have given will have to be shared with others, if this indicates they and or other children are at risk of harm
- Notify the DSP as soon as possible
- Make brief notes at the earliest possible time in line with the Data Protection Policy. Remember to keep to factual information and not assumption or interpretation. Use the child's own language to quote rather than translating into your own terms. Be aware that these sheets may be used later



to support a referral to Children Services and pass to the DSP in the setting via CPOMS, My Concern or by following the school's procedure as outlined in their policy. The recipient will discuss the concerns and an action/response will be agreed. (See Appendix 1 further advice re: Disclosure). A record of concern will also be recorded on NESSie's digital database system following the template of NESSie Record of Concern Form (Appendix 1). If the CYP is referred privately, please report concerns directly to the NESSie DSP and complete the online Record of Concern Form.

- In the case of there being bruises or observed injuries, complete the Body Map document (available in the Child Protection folder) and pass this onto the DSP.
- Respect confidentiality and file documents securely

## Step 2

The NESSie or setting DSP will take immediate action if there is a suspicion that a child has been abused or likely to be abused. In this situation the NESSie or setting DSP will contact the Police and/or Children Services. If a referral is made direct to Children's Services, this must be followed up in writing within 24 hrs.

Recorded information from social care meetings and other CP related documents are stored in separate document wallets in a secure cupboard in the NESSie Operations Office in line with the Data Protection Policy.

NB Parents / carers will need to be informed about any referral to Children, Schools and Families unless to do so would place the child at an increased risk of harm.

The NESSie or setting DSP can also seek advice and clarity about a situation that is beginning to raise concern through **Children's Services 0300 123 4043** or from the **NSPCC 0800 800 5000**, [website](#).

Professionals, employees, managers, helpers, carers and volunteers in all agencies must make contact Children's Services:

- If it is believed or suspected that a child is suffering or is likely to suffer **Significant Harm**, or
- Where a professional has identified unmet need in relation to a **Child in Need**

A referral must be made as soon as possible when any concern of significant harm becomes known - the greater the level of perceived risk, the more urgent the action should be.

## IF YOU ARE WORRIED ABOUT A CHILD YOU HAVE A DUTY TO REFER

The belief or suspicion about significant harm may be based on information which comes from different sources. It may come from a member of the public, the child concerned, another child, a family member or other professional staff. It may relate to a single incident or an accumulation of lower-level concerns.

The information may also relate to harm caused by another child, in which case both children, i.e.



the suspected perpetrator and victim, must be referred.

The suspicion or allegation may relate to a parent or professional or volunteer caring for or working with the child – see Section 9 below Managing Allegations against an Adult who works with children or young people.

**A referral must be made even if it is known that Children’s Services Social Care are already involved with the child/family.**

Advice and consultation may be sought about the appropriateness of the referral by contacting the local Children’s Services or, if the case is open, from the allocated social worker. Alternatively, advice may be sought from the Police or the Named Person for Safeguarding.

## 8. Safer Staffing and DBS checks

All adults working for or with NESSie will have been appropriately recruited and DBSs or Enhanced DBSs will be applied for and references taken up. Their induction into the organisation will include basic child protection training, and a briefing on this policy.

All staff must undergo enhanced DBS checks before taking up a position. Staff and volunteers are inducted into NESSie’s child protection responsibilities and procedures. They are informed of the main points of this policy.

For more information, please visit the Government website [link](#)

## 9. Managing Allegations against an adult who works with children or young people

***Please visit the HSCP website for guidance: [Section 4.1](#). In Hertfordshire, allegations against a member of staff or a volunteer organisation working with children and young people must be referred to the Local Authority Designated Officer (LADO).***

Whenever it is alleged a person who works with children has in any activity connected with her/his employment or voluntary activity:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against / related to a child
- Behaved toward a child in a way which indicates s/he is unsuitable to work with children

These procedures apply to situations when:

- There are suspicions or allegations of abuse by a person who works with children in either a paid or unpaid capacity - as a permanent, temporary or agency staff member, contract worker, consultant, volunteer, approved foster carer, child minder or approved adopter
- It is discovered that an individual known to have been involved previously in child abuse, is or has been working with children

If concerns arise about the person's behaviour to her/his own children, Police and/or Children’s



Services must consider informing her/his employer in order to assess whether there may be implications for children with whom the person has contact at work. A decision as to whether the person's employer should be approached, either for further information and/or whether it is appropriate to invite the employer to a future Strategy Meeting when decisions are to be made about managing the possible risk, should be made at the initial Strategy Meeting when all agencies can contribute. The risk that someone presents needs to be properly considered and a decision made whether the risk outweighs the employee's right to confidentiality before an employer is approached.

If an allegation relating to a child is made about a person undertaking paid or unpaid care of vulnerable adults, consideration must also be given to the need to alert those who manage her/him in that role.

### 9.1 Procedure

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification, it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making a written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, what was said and anyone else present. This record should be signed and dated and immediately passed on to the **Designated Safeguarding Person** without delay.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

If there is an immediate or imminent risk of significant harm to a child or young person, you should contact Children's Services or the Police and then speak to the **Designated Safeguarding Person** to inform them of the actions you have taken and follow this up in writing on the form attached at Appendix 1.

The **Designated Safeguarding Person** must take steps to ensure that the person against whom the allegation is removed from the situation immediately. This may be done by either agreement or suspension from the organisation until the matter has been fully investigated.

The **Designated Safeguarding Person** will follow the HSCP Procedures Managing Allegations against Adults who work with Children and Young People by referring the issue to the Local Authority Designated Officer (LADO). [Link](#)

Any member of staff who believes that allegations or suspicions, which have been reported to the appropriate manager, are not being investigated properly has a responsibility to report it to a higher level in her/his agency or directly to the LADO.

The LADO must be told, within one working day, of all allegations that come to the employer's attention and appear to meet the criteria so that s/he can consult or refer to the Police and Children's Services, as appropriate.



If, for any reason, there are difficulties with following the above procedure, the Whistle Blowing Procedure should be considered, or a referral made directly to Children's Services and/or the Police.

**The need for consultation must not delay a referral**, which should be in accordance with the referral procedure.

The employer should keep the subject of allegations informed of progress in the case and arrange to provide appropriate support (via Occupational Health or equivalent). If the person is suspended, s/he should be kept informed of development in the workplace and if a member of a Trades Union or professional association, advised at the outset to contact that body.

## 10. Confidentiality

Information about a referral about a child or an allegation against a member of staff or volunteer must be restricted to those who have a need to know in order to:

- Protect children
- Facilitate enquiries
- Avoid victimisation
- Safeguard the rights of the person about whom the allegation has been made and others who might be affected
- Manage disciplinary / complaints aspects

The DSP may ask you for further information in order to make any referrals. You should not discuss or share this information with anyone else within the organisation. Any paperwork you have generated should be stored in a locked filing cabinet or stored on a computer securely.

All staff members have a professional responsibility to share relevant information about the protection of children with the investigative agencies. Members of staff should not promise confidentiality but can let the child know that only those who need to know will be informed and that that will be for the child's own sake. Time should be taken to reassure the child and confirm that information given will be treated sensitively. Reassurance should be given and the adult involved should listen sympathetically and not make any judgement. Staff should be careful and ensure that information is only given to the appropriate person (DSP). All staff should be kept aware of issues relating to confidentiality and the status of information they may hold. Members of staff, other than the DSP and those involved closely, should only have enough details in order to help them to act sensitively and appropriately to a pupil. Discretion should be used when talking about the personal, and changing, circumstances of children, for example becoming a looked after child. Care is particularly necessary after attending CP meetings. Information received should be treated sensitively and discretion is needed.

### 10.1. Supporting children at risk

For children at risk, school may be the one stable place from which they can expect security and reassurance. Schools and NESSie staff should not only be alert to potential abuse but provide support to help children through difficult times. Schools and NESSie staff should offer





coping skills that help avoid situations arising or the emotional difficulties that could result.

### **10.2. Support in school**

For children at risk, school may be the one stable place from which they can expect security and reassurance. Schools and NESSie staff should not only be alert to potential abuse but provide support to help children through difficult times. Schools and NESSie staff should offer coping skills that help avoid situations arising or the emotional difficulties that could result.

## **11. Managing activities involving children and young people**

When managing an activity involving children and young people, it is important to consider a risk assessment, both in terms of the health and safety of the participants, but also of the potential child protection issues.

Each activity should have a risk assessment undertaken to consider what level and impact of risk there may be to the children and to the staff or volunteers.

### **11.1. Record keeping**

Whilst record keeping may seem overly bureaucratic from time to time, it is important to keep good and clear records of the work of your organisation. It is particularly important to keep a register of attendance and a fire register and emergency contact details for all children and adults working with you.

Any details must be kept securely in accordance with the Data Protection Act 2018. You should also store copies of your risk assessments for activities (see the next section).

Good record keeping promotes confidence in the organisation and in the safety of children who are participating in the activities.

### **11.2. Off Site Visits**

Visit staff should ensure that they are informed of any children and young people who may be particularly vulnerable or have specific safeguarding needs, and ensure that other staff/adults are made aware as necessary

A full risk assessment must be completed for any Off Site Visit.

### **11.3. Taking photographs or videos of children**

NESSie will always ask for written consent from a child and their parents or carers before taking and using a child's image or using any device that can record. NESSie will always explain what images will be used for, how they will be stored and what potential risks are associated with sharing images of children. NESSie will always make it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published. NESSie will always change the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them). NESSie will never publishing personal information about individual children and will disguise any identifying information (for example the name of their school or a school





uniform with a logo). NESSie will make sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information). To reduce the risk of images being copied and used inappropriately only using images of children in appropriate clothing (including safety wear if necessary) will be taken and using images that positively reflect young people's involvement in the activity.

## **12. Inter-agency liaison**

At times NESSie staff will be called to participate in meetings organised and chaired by Children Services. These might be strategy discussions, the child protection review conference, child protection conferences, FFA (Families First Assessment) where families and professionals from different agencies are asked to meet to discuss children and their families with a view to providing support or to make recommendations in terms of next stages of involvement, family group conferences (for Children In Need), in a range of circumstances where a plan is required for the child's future welfare core group meetings in which a 'core' group of professionals associated with the family are asked to meet to review the progress of actions decided at case conferences and register reviews.

At these meetings, representatives from NESSie should be ready to report providing information about attendance and punctuality, engagement with sessions, the child's behaviour and attitude, relationships with peer group and social skills, generally the child's appearance and share any appropriate assessment data or therapeutic content. If a therapist decides that it is necessary and, in the person's best interest to share information from the therapeutic sessions, they will attempt to gain consent to do so. They may also share contact with parents / carers and any specific incidents that need reporting.

Prior to the meeting, class teachers and other adults working closely with the child should be asked for their comments. Following the meeting, feedback should be given, and staff brought up to date with any actions that are needed.

## **13. The Child Protection Register**

Children placed on the register will require additional support and monitoring. Children's Services will inform the school / setting and if applicable NESSie. When receiving a child on the CP register any accompanying records should follow from the child's previous school.

## **14. Physical contact with pupils**

Some form of physical contact with pupils by staff is inevitable. In some cases, it is necessary for reassurance. However, all staff should be aware of issues related to touching and the way in which this might be misconstrued. This relates particularly to any sensitive areas of the body. In the event of physical restraint being used it is important that only minimum pressure is used, in order to prevent the pupil from causing injury to themselves, others or property. Following such an intervention, a Record of Concern form must be completed.



## 15. Working with parents

It is important that NESSie has an established approach to working with parents. Parents' and children's need for privacy should be respected. Attitudes to, and contact with, parents should be non-judgmental in order to obtain the most effective working relationship. The priority is the needs of the child and effective liaison. It should be recognised that families from different backgrounds and cultures will have different approaches to child-rearing. These differences should be acknowledged and respected, provided they do not place the child at risk as defined earlier in the document.

## 16. Review and monitoring of this policy

This policy will be reviewed on an annual basis or earlier if legislation should change.

Remember, if you have a serious concern that a child is at risk of significant harm, and, for whatever reason, you are unable to follow the process described in this guide, then make the referral yourself.

We are committed to reviewing our policy and good practice annually. This policy was last reviewed by the Safeguarding Non-Executive Director and CEO on: 1<sup>st</sup> March 2022

Signed:

A handwritten signature in blue ink that reads "R. Lambie". The signature is written in a cursive style and is positioned to the right of the word "Signed:".



Appendix 1: Record of Concern

**RECORD OF CONCERN**

**Not to be taken off school premises or emailed without encryption with the password texted not emailed. If working in a setting please adopt their process of reporting concern. This document is useful in exception circumstances i.e. remote access or for reporting incidents of concern to NESSie or when a concern is regarding a private client or realised in hindsight. NESSie staff are to report concerns to a setting before they leave the site where possible.**

Child's name:			
School (if applicable):			
Male/Female :	DOB:	Disability Y/N :	Year Group:
Date and time of concern :			
Your account of the concern : (what was said, observed, reported and by whom)			
Additional information : (your opinion, context of concern/disclosure)			
Your response : (what did you do/say following the concern)			
Your name :		Your signature :	
Your job title :		Date and time of this recording :	
If you referred this directly to Children School and Families or the Police please state why, include the name of the worker / officer you spoke to and the date / time			



Name of school DSP if applicable: Initials of NESSie DSP informed:	
Action and response of DSP:	
DSP Signature:	Date:



## Appendix 2: Checklist for making a record of concern

- ✓ Child clearly identified?
- ✓ Name, designation and signature of the person completing the record populated?
- ✓ Date and time of any incidents or when a concern was observed?
- ✓ Date and time of written record?
- ✓ Distinguish between fact, opinion and hearsay
- ✓ Concern described in sufficient detail, i.e. no further clarification necessary?
- ✓ Child's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
- ✓ Record free of jargon?
- ✓ Written in a professional manner without stereotyping or discrimination?
- ✓ The record includes an attached completed body map (if relevant) to show any visible injuries (body map available at [www.thegrid.org.uk/info/welfare/child\\_protection/proformas/index.shtml](http://www.thegrid.org.uk/info/welfare/child_protection/proformas/index.shtml) )



## Appendix 2: Modern Slavery and Human Trafficking

Victims of modern slavery and human trafficking should be given protection, provided with the help they need to recover from their experiences and gain access to the justice they deserve. This model child protection policy sets out guidance on national and international definitions of child slavery and trafficking, national legislation, how to identify potential victims, safeguarding and reporting possible cases in Hertfordshire, and additional resources/contacts.

### Context

Modern slavery and human trafficking are forms of serious organised crime in which individuals including children and young people are treated as commodities and exploited for criminal gain. Year on year, the UK is seeing an increase in the number of children of both UK and other nationalities that are being enslaved and/or trafficked internally within the UK. In fact, in the UK 43% of victims of modern slavery/trafficking are children.<sup>1</sup> These crime types are identified as child abuse which require a child protection response. It is also an abuse of human rights, and all children, irrespective of their immigration status, are entitled to protection under the law. The organised crime of child trafficking into and/or around the UK is an issue of considerable concern to all professionals with responsibility for the care and protection of children.

All children, including UK born children, are vulnerable to slavery and/or trafficking. Through use of deception, coercion and/or force, children are recruited, moved or transported and then exploited, forced to work and/or sold. Victims often face more than one type of abuse and slavery, for example they may be sold to another trafficker and then forced into another form of exploitation. Grooming methods are used to gain the trust of a child and their parents e.g. the promise of a better life or education. Children and young people may also be exploited by parents, carers or family members. Often the child or young person will not realise that family members are involved in the exploitation. Trafficked and enslaved children are victims of serious crime and this will impact on their health and welfare. In order to coerce and control, they are commonly subject to physical abuse including use of drugs and alcohol, emotional and psychological abuse, sexual abuse and neglect as a result of a lack of care about their welfare and the need for secrecy surrounding their circumstances.

### Definition

Boys and girls of all ages are affected and can be enslaved and/or trafficked into, within ('internal trafficking'), and out of the UK for many reasons and for the purpose of many types of exploitation. These include:

- **Labour Exploitation:** *Forced to work very long hours in often hazardous conditions and hand over the majority or all of their wages to their traffickers or exploiters. Violence and threats may be used against victims or against their families if they fail to comply.*

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<sup>1</sup> Home Office, *National Referral Mechanism Statistics UK, End of Year Summary, 2019*  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/876646/national-referral-mechanism-statistics-uk-end-of-year-summary-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876646/national-referral-mechanism-statistics-uk-end-of-year-summary-2019.pdf)



- **Sexual Exploitation:** *Actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. (See also [Children Abused through Sexual Exploitation Procedure](#))*
- **Criminal Exploitation:** *Victims are often deceived or coerced into helping their exploiters acquire financial gains. They may be involved in fraud e.g. benefit or credit card, cannabis cultivation, drug trafficking, petty theft, begging.*
- **Domestic Servitude:** *Victims live and work in households where they are forced [or expected] to work beyond reasonable expectations. Domestic servitude is often reinforced through threats of destitution, serious harm or other retribution, and victims may be subjected to physical and sexual assaults. There is often restriction of liberty and movement and victims may not be able to leave their accommodation.*
- **Organ Harvesting:** *Illegal removal of internal organs for transplant with or without the donor's consent.*
- **Illegal Adoption:** *Adoption of a child for the purpose of exploitation.*
- **Baby Farming:** *Birth of a child for the purpose of exploitation.*
- **Sham Marriage:** *One or both people don't consent to a marriage and pressure and/or abuse from family is used, linked to changing immigration status, for example.*
- **Forced Marriage:** *One or both people don't consent to a marriage and pressure and/or abuse from family is used. It is important to note the distinction between forced marriage and legitimately 'arranged marriage', although the two can be difficult to distinguish and may require further investigation.*

## Legislation

### Modern Slavery Act 2015

The Modern Slavery Act consolidated and simplified existing human trafficking and modern slavery offences into a single act in 2015. Under the Modern Slavery Act 2015, modern slavery occurs in a situation where a child being held in slavery<sup>2</sup> or servitude<sup>3</sup> or required to perform forced or compulsory labour. In most situations, slavery is very unlikely to have occurred in isolation of trafficking taking place, but it is possible. For any case, where slavery and/or trafficking is identified, an NRM referral must be submitted to the Home Office, informing them of the identification of a potential child victim of trafficking and/or slavery.

### United Nations Palermo Protocol 2006

<sup>2</sup> Slavery refers to the condition in which a child is owned as property by another and is under the owner's control, especially in involuntary servitude.

<sup>3</sup> Servitude refers to a condition in which a child lacks liberty, especially to determine one's course of action or way of life.

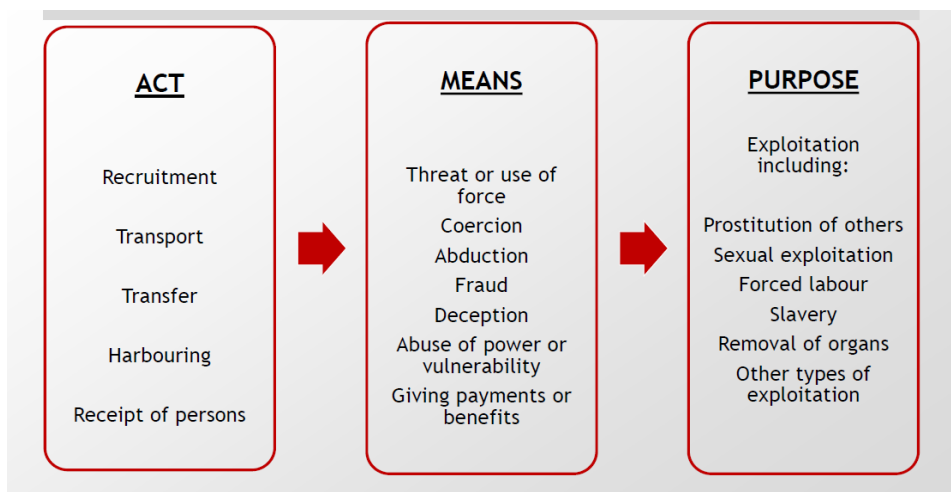
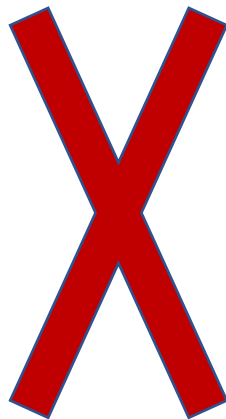


Under the [United Nations 'Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children'](#) (ratified by the UK in 2006), a child that has been exploited is also deemed to have been trafficked if the following considerations are met:

1. **ACT:** *Recruitment, transportation, transfer, harbouring or receipt of the child(ren)*
2. **MEANS:** *By means of 1) the threat or use of force or 2) other forms of coercion, 3) of abduction, 4) of fraud, 5) of deception, 6) of the abuse of power or 7) of a position of vulnerability or 8) of the giving or receiving of payments or benefits to achieve the consent of control over the child(ren) in question.*
3. **PURPOSE:** *For the purpose of exploitation (i.e. sexual/labour/criminal exploitation etc)*

Children cannot consent to their own exploitation. Where a victim of exploitation is under 18, the 'means' used by exploiters – whether coercion, force, deception or other – is irrelevant. As a result, the perceived consent of a child to such activities is irrelevant where any of the means provided above have been used by the perpetrator(s), which is emphasised in the below diagram. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected also.

Diagram:







In addition, the 'travel' aspect does not need to be over large distances to constitute an offence. For example, a child forced to carry drugs from one house to another on the same street should be considered equally to a young person transported across international borders to work in a cannabis factory. Equally, it is also not necessary for an actual act of sexual abuse or criminality to take place; just evidencing the intent of the exploiter is sufficient.

## Grooming

Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed, or that what has happened is abuse. As with sexual exploitation and abuse, the grooming process often includes a number of stages, relating to the conditions outlined in the Palermo definition – including deception, manipulation, coercion and control. See below for further information on the grooming cycle:

## Indicators

### Grooming Process: Exploitation of Young and Vulnerable People

The grooming process is essential to the success of the county lines business model. Young or vulnerable people are lured in with false promises and then become trapped into a dire, exploitative situation. There are four main recruitment stages that a gang will use when trying to exploit someone:

Modern slavery is often hidden in nature, and goes unnoticed in our



#### 1. Targeting Stage:

This is when an exploiter targets a young person who is vulnerable, reducing their chances of getting caught. Exploiters pick their targets based on things like age, strength or situation.



**2. Experience Stage:** This stage is where an exploiter might try to get a young person used to their lifestyle, or train them up in what they're doing.



#### 3. Hooked Stage:

This is the stage where an exploiter will make a young person feel like they're a member of their gang, even though they're just exploiting them.



#### 4. Trapped Stage:

Now a young person feels dependent on the group, their relationship with their exploiter may start to become unpleasant, as their exploiter's true intents or character is revealed. (Taken from [Children's Society \(2018\) Criminal Exploitation: Stages of Recruitment report](#))

communities, with under-reporting a major concern. Identification of trafficked and/or enslaved children may be difficult as they might not show obvious signs of distress or abuse, or children may show signs of multiple forms of abuse and neglect. Some children are even unaware that they have been trafficked and/or enslaved, even appearing to consent to activities linked to their exploitation, while others may actively participate in hiding that they have been trafficked. The following indicators are not a definitive list and are intended as a guide to be included in a wider assessment of the child's circumstances:



### 1) Physical Appearance:

- e.g. Signs of physical or psychological abuse, looking malnourished or unkempt, few personal possessions or expensive clothing; and/or appearing withdrawn and/or tired.

### 2) Behaviour (including psychological indicators)

- e.g. Hyper alert or nervous; depression, self-harm or low self-esteem; withdrawal from school, family, friends and/or activities; and/or unusual behaviour for their age e.g. use of oversexualised language

### 3) Dependency on Traffickers/Exploiter:

- e.g. Reluctant to seek help; unwilling to disclose details or experience; information gaps and discrepancies; and/or seemingly willing participant in their exploitation.

### 4) Familial Relationship Concerns

- e.g. Poor and/or unusually close relationship with guardian and/or parents; child with no relation to accompanying adults; living with multiple unrelated children; and/or without family.

### 5) Missing Concerns

- e.g. Missing from care, home or school; pattern of registration and de-registration from different schools; missing episodes are frequent, historical and/or long; found in location far from home address and/or refusing to disclose where they have been.

### 6) Other Indicators:

- Rarely leaving their home, with no freedom of movement and no time for playing, only household chores.
- Poor living and working conditions i.e. dirty, cramped or overcrowded accommodation.
- Does not appear to have money but does have a mobile phone.
- Unexplained/unidentified phone calls or letters being received by the child from adults outside the usual range of contacts and/or whilst in placement/temporary accommodation.
- Moving and/or selling drugs within and across county
- Unaccompanied on trains/in cities far from home
- Working at cannabis farms/factories or in cuckooed properties
- Working in construction sites, factories, barber shops etc.
- Fake documents and/or fake name
- Sexually transmitted infections, pregnancy and/or UTIs
- Associating with known or suspected gang members or be close to siblings or adults in the family who are gang members.
- Possessing large amounts of money (including being seen with large sums of cash and/or large numbers of bank cards; acquiring expensive clothes/mobile phones without plausible explanation.

## **Safeguarding: Action to be Taken and Reporting**

Any agency or individual practitioner or volunteer who has a concern regarding the possible enslavement and/or [trafficking](#) of a child should immediately follow 3 steps in line with the [HMSP Child Victim Referral Pathway](#):

- **Step 1: Assess for Immediate Risk**

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- **Step 2: Initial Contact**
- **Step 3: Recording and Reporting**

**IF YOU SUSPECT THAT EXPLOITATION IS BEING CARRIED OUT BY THE FAMILY MEMBERS/CARE GIVERS, DO NOT RAISE YOUR TRAFFICKING/ SLAVERY CONCERNS WITH, OR TRANSLATE THROUGH THEM OR ANYONE ACCOMPANYING THE CHILD UNDER ANY CIRCUMSTANCES.**

#### **Specific Protocols:**

- If the child is 1) in imminent danger or 2) at significant risk of harm or 3) in danger of going missing, call 999 and request for police to attend.
- Ensure that the safety of the child is the first priority. If the child is at immediate risk of harm, then keep them in the setting where they have been identified, whilst in conversation with children's services and the police, who will provide further direction.
- Follow your organisation's child protection and safeguarding procedures.
- Consider the safety and comfort of the child before asking any questions.
- Be aware that it may be more appropriate for someone else/a different agency to speak to the child.
- Notify Hertfordshire County Council Children's Services within 24 hours: <https://eservices.hertfordshire.gov.uk/services/child-protection-referral>.

For 24/7 advice and translation support, call the national Modern Slavery Helpline – 08000 121700 or the Independent Child Trafficking Guardian Service advice line: 0800 043 4303

#### **National Referral Mechanism**

The [National Referral Mechanism](#) is the UK's framework for identifying and reporting victims of modern slavery, including specific support provision for adults and children.

All suspected and identified child victims of modern slavery and human trafficking in line with the definitions provided in the Modern Slavery Act and the United Nations Palermo Protocol must be referred to the National Referral Mechanism (NRM). Only First Responder designated organisations can report and refer potential victims to the National Referral Mechanism (NRM). Locally, only Local Authority and Police are classified as First Responder designated organisations.

Following referral to Children's Services, a multi-agency meeting will be organised by HCC (STRAT or MARM) to discuss possible NRM submission, the lead First Responder organisation will then submit the NRM form online with input from the other relevant organisations involved in the child's case. If there is disagreement between practitioners as to whether an NRM should be submitted for a child, the case will be escalated in line with the agreed escalation process.

Please Note: The NRM does not supersede child protection procedures, so existing safeguarding processes will still be followed in tandem with the notifications to the NRM. Support to children is provided through local authority children's services rather than NRM subcontractors.

If a child receives a negative NRM decision, any organisation may submit a reconsideration request. Practitioners should follow these steps:

- 1) Contact the Single Competent Authority (SCA) directly either via email to



inbox [NRMEngland@homeoffice.gov.uk](mailto:NRMEngland@homeoffice.gov.uk) or via the Duty Line on 0207 035 5689.

- 2) If further information comes to light, which is relevant to an original submission, the practitioner should email the information directly to the SCA on the following email address: [nationalreferralmechanism@homeoffice.gov.uk](mailto:nationalreferralmechanism@homeoffice.gov.uk).

For further information, see SCA Home Office Guidance (p.65) and the reconsideration policy amendment statement.

## Contacts and Resources

### 1. Hertfordshire County Council Children's Services

- Website: <https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/report-child-protection-concern.aspx>.
- Email: [protectedreferrals.cs@hertfordshire.gov.uk](mailto:protectedreferrals.cs@hertfordshire.gov.uk)
- Phone: 0300 123 4043
- Referral Form: <https://eservices.hertfordshire.gov.uk/services/child-protection-referral>.

### 2. Modern Slavery Helpline

The 24/7 national Modern Slavery Helpline is run by the charity, Unseen, and is independent, specialist and confidential, providing access to free and immediate help, support, and advice in over 200 languages. Victims can also self-refer.

- Website: [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)
- Email: [www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)
- Phone: 08000 121 700

### 3. Independent Child Trafficking Guardian (ICTG) Service

Run by Barnardo's, the ICTG Service provides direct, specialist practical and emotional support to trafficked children, facilitating their interactions with social care services, police and immigration in Wales/Cymru, East Midlands, West Midlands Combined Authorities, Croydon, Hampshire and the Isle of Wight and Greater Manchester. They also operate a 24/7 helpline, which is open for advice to all practitioners across the UK.

- Website: [www.barnardos.org.uk/what-we-do/protecting-children/trafficked-children](http://www.barnardos.org.uk/what-we-do/protecting-children/trafficked-children)
- Phone: 0800 043 4303

### 4. Beacon

Independent from the National Referral Mechanism, UK Government and the police, Beacon is a free and impartial service that can provide emotional and practical support around the impact and effects of exploitation to clients in Hertfordshire. Run by the charity, Catch 22, Beacon supports their clients through allocation of a specially trained case manager. Victims can also self-refer.

- Website: [www.hertfordshirebeacon.org](http://www.hertfordshirebeacon.org)
- Email: [info@hertfordshirebeacon.org](mailto:info@hertfordshirebeacon.org)
- Phone: 03000 11 55 55 (option 3)

### 5. ATLEU

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ATLEU is a charity, which provides legal representation to victims of trafficking and labour exploitation, helping victims to obtain safety, recovery and redress. They offer numerous services to help practitioners support victims:

- Advice Line: Any practitioner can request for free support via phone (0207 700 7311) or email: [advice@atleu.org.uk](mailto:advice@atleu.org.uk). (See <https://atleu.org.uk/adviceline> for further information on what to include in the email).
- Refer victims for legal support: <https://atleu.org.uk/referrals>.
- Subscribe to gain free access to the ATHUB:12F<sup>4</sup> <https://athub.org.uk/>.

## Resources

- 1) Hertfordshire Modern Slavery Partnership: [www.stopexploitationherts.org.uk](http://www.stopexploitationherts.org.uk) ([Free resources and training package available](#))
- 2) The Children's Society : Victim Support and NPCC: Capturing and Reporting Intelligence on CSE and CCE - [Guidance for Families, Professionals and the Community](#)
- 3) The Children's Society, Victim Support and NPCC (2 Mar 2018): **Children and Young People Trafficked for the Purpose of Criminal Exploitation in Relation to County Lines – A Toolkit for Professionals.**
- 4) The Children's Society : **Criminal exploitation and County Lines: A toolkit for working with children and young people.**
- 5) London Safeguarding Children Partnership: [Trafficked Children Toolkit \(2011\)](#)
- 6) **[ECPAT: UK Briefing Paper on Child Trafficking - Begging and Organised Crime \(2010\)](#)**

## E-Learning

The Salvation Army: free online e-learning module on human trafficking awareness. [Access training here.](#)

Home Office (MSOIC): free online e-learning module. [Access training here.](#)

ECPAT UK/West Yorkshire Police: 2 to 3 hours in depth e-learning package. The package can be accessed for a fee at [Virtual College](#).

## Appendix 4: Private Fostering

A Private Fostering arrangement is essentially one that is made, without the involvement of a Local Authority, for a child under the age of 16 (under 18 if disabled) to be cared for by someone other than a parent or close relative for 28 days or more. Privately fostered children are a diverse and sometimes vulnerable group and reasons for such arrangements may include:

- Family or relationship breakdown
- Young people who move to live with boyfriend/girlfriend or “sofa surfers”
- Parental illness or the death of parent
- Parents living, working or studying overseas
- Children sent to UK for education or health purposes whilst parents remain overseas
- Children whose parents are in hospital or prison

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<sup>4</sup> ATHUB is an online information resource for professionals working with victims of trafficking. It contains information for support providers and legal practitioners on advising and representing victims of trafficking across different areas of law.



- Migrant children/unaccompanied asylum-seeking children
- Children brought to the UK with a view to adoption
- Children who may have been trafficked
- Foreign language students or exchange students staying with host families
- Children attending sports academies and living away from parents with host families

Under the Children Act 1989, private foster carers and/or parents are required to notify the Local Authority of any private fostering arrangement and ideally this should be done in writing six weeks before the arrangement commences or as soon as the arrangement starts if it is an emergency.

For further information and details see the Hertfordshire County Council leaflet “A Guide to Private Fostering” available on the website [\[link\]](#).

Teachers, health and other professionals must notify Children’s Services (Social Care) of a private fostering arrangement that comes to their attention, particularly if concerned that the arrangement has not been or will not be notified.

Following notification of a private fostering arrangement, it is the duty of the Local Authority to satisfy itself that the welfare of the children, who are privately fostered within their area, is being satisfactorily safeguarded and promoted. This includes an initial visit to the child and private foster carers within seven days of receipt of notification of the arrangement and an assessment under the [Framework for the Assessment of Children in Need and their Families will be completed](#). The private foster carers will be separately assessed and this will include an enhanced [Disclosure and Barring Service \(DBS\)](#) check.

The Local Authority has a statutory duty to visit privately fostered children at regular intervals - at a minimum:

- every six weeks in the first year of the arrangement;
- every twelve weeks in the second or subsequent years, and
- additionally, if reasonably requested to do so by the child, private foster carer or parent.

Children should be given the contact details of the social worker who will be visiting them while they are being privately fostered.

All arrangements and regulations in relation to private fostering are set out in the [Children \(Private Arrangements for Fostering\) Regulations 2005](#).

Childrens Services (Social Care) have their own detailed procedures for carrying out their responsibilities on this issue.

When there are concerns about **significant harm** to a child who is privately fostered the Local Authority and all the other agencies have the same duties to make enquiries as they do with any other child. The concerns must be reported to the Local Authority where the private foster placement is located in accordance with the [Referrals Procedure](#) and the Safeguarding Children Procedures will be applied.





## Appendix 4: Useful Contacts/Support Organisations

If you have concern that a child is being harmed as a result of abuse or neglect, you must not keep these concerns to yourself. Keeping children safe is everyone's responsibility. You need to ensure that you speak to the appropriate organisations who can listen to and record your concern, and then take appropriate action. In Hertfordshire, these are the numbers that you can ring for advice and to make a referral:

**Children's Services** (including out of hours): 0300 123 4043

**The Joint Child Protection Team (JCPIT):** 0845 33 00 222. This is a specialist team that is a department within the police with countywide responsibility for undertaking child protection investigations.

**The Police:** 999 (in an emergency)

### **Families First**

Families First is a whole system, countywide multi-agency response to supporting family outcomes at a local level. It brings together organisations that provide early help services under one umbrella of consistent practice and clear processes.

Where a case is already open to Children Services, contact should be made with the allocated social worker. If you have information that suggests an urgent child protection matter, please speak to the allocated social worker or their Team Manager without delay.

[Website](#)

### **Hertfordshire Domestic Abuse Help Line**

A confidential, free, support and signposting service for anyone affected by Domestic Abuse. Our aim is to improve the lives of those affected by domestic abuse including those seeking help to change their behaviour. [Website](#)

### **Herts Sunflower**

Free and confidential support for anyone affected by domestic abuse. [Website](#)

### **Other useful contact information**

To contact the **Forced Marriage Unit** and be directed to agencies in your area that can help you NOW call Forced Marriage Unit on 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

The Forced Marriage Unit was set up in 2005 and provides support to victims as well as expert training and guidance to professionals. It is jointly run by the Home Office and Foreign and Commonwealth Office. In 2011 they dealt with over 1400 calls in relation to forced marriages. [Link](#)

***If the situation is urgent always call 999***

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## **NSPCC Child Protection Helpline**

The NSPCC Child Protection Helpline is a free 24-hour service that provides counselling, information and advice to anyone concerned about a child at risk of abuse. Telephone: 0808 800 5000 - [website](#)

## **Online Safety**

NSPCC [Online Safety](#)

*It can be hard to know how to talk to your child about online safety. From setting up parental controls to advice on sexting, online games and video apps, we can help you to understand the risks and keep your child safe.*

[UK Safer Internet Centre](#) provides online safety tips, advice and resource to help children and young people stay safe online.

## **Bullying and Cyberbullying**

[NSPCC website](#) gives guidance and advice on the signs of bullying and cyberbullying, the effects and prevention.

## **Additional resources**

[NSPCC Learning Voluntary and Community Groups](#)

We all have a responsibility to help keep children safe. Organisations working with children and young people must have safeguarding policies and procedures in place and be able to respond to child protection concerns. But we understand that it's not always easy to know exactly what you need to do. That's why we've produced a range of resources for voluntary and community groups.

**WHEN IN DOUBT, CONCERNS MUST BE SHARED APPROPRIATELY**

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